

Schedule of representations on the Core Strategy Preferred Options Document

October 2008

General Comments

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommended change
ABP	1	General	Difficult to understand the possible implications due to the lack of specific wording of Core Strategy policies – request draft wording when available. We are concerned that the document and its policies say very little on other critical matters affecting the Port i.e. treatment of employment land, scale of housing and employment growth.	The Core Strategy is a broad strategic document and therefore does not deal with specific land allocations or development control policies. The Proposed Submission document will be available for comment and will include general policies on employment land, scale of housing and employment growth.	No change required.
City of Southampton Society	1	General	A few key targets should be identified to be given priority. By detailing specific targets, with deadlines, more focus would be given to the tasks with a better chance of achievement in the time frame. In our view, the key elements to be given priority are the economy and city identity.	The strategy should cover all of the major issues arising. Economy and city identity are important, as are issues such as sustainable development. Some targets have been given and others will be made in future LDF documents.	No change required.
West End Parish Council	1	General	The plan takes no account of the villages which butt into the City and their impact on the City plan, e.g. houses planned for the short and long term in Hedge End	The Core Strategy follows the general policies in the South East Plan and the specific policies for the South Hampshire sub-region as developed by the Partnership for South Hampshire (PUSH).	No change required.
Drivers Jonas on behalf of SEEDA	2	General	Alternative options - Little or no justification is provided for the alternative options considered and rejected.	A separate document 'Alternative options considered and rejected' was produced to provide this information.	No change required.
Environment Agency	1	General	Two areas of concern: biodiversity protection/enhancement in particular of estuarine habitats and lack of attention given to groundwater and land contamination issues	These areas will be covered in the sections on natural environment and climate change.	No change required.
GOSE	1	General	Suggest considering distinguishing between the policies in the submission document as follows: a) Core policies to support the strategy, b) Those needed to deliver windfalls, c) Development control policies (specific to the borough). At present the document is approximately 100 pages long. PPS12 (paragraph 2.2) states the format of LDDs should be clear, succinct and easily understood by all. The Regulation 26 document contains general background information as well as Core Strategy content. The Town and Country Planning (Local Development)(England) Regulations 2004 state that Local Planning authorities may prepare supporting documents that are relevant to the preparation of the DPD. Have you considered this point in terms of the final structure of the document?	Note comments on structure of document. The Proposed Submission document will be re-structured. It has been revised to set out initially the key issues facing the city, the spatial vision and strategic objectives, the spatial strategy and policies. This is followed by the Key Diagram, a section on implementation and monitoring and the appendices. The Proposed Submission document will be accompanied by background documents	Revise document to amend the structure.
Mrs Moyra Clearkin	1	General	Comments on the consultation	Comments noted	No change required.
Peter Clay	1	General	Comments on the process – the difficulty finding the correct pages on the website or any plans, programmes or projects and then for residents to understand what it is actually saying. The plan could apply to any City in Europe and wasn't specific at all.	Comments noted. Since the Preferred Options document was printed the website has been revised. Consider that the Proposed Submission document will be Southampton specific.	No change required.
R C Blandford	1	General	Comment on the consultation	Comments noted	No change required.
SEEDA	1	General	The paper is well thought through and responds to all the questions and issues I have come across in the short time I have been working in Southampton area.	Welcome comments	No change required.

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The Environment Centre	1	General	Insufficient detail about how targets will be met, which land will be developed, what constitutes as 'sustainable' and where priorities will lie. Without clarifying these it is difficult to comment on the Strategy. There should be on-going consultation and communication as plans become reality.	The Core Strategy is a strategic document that does not concentrate on land allocations or development control policies; these will be in future LDF documents. Consultation takes place at each stage of the process.	No change required.
Chamber of Commerce	1	General	Query about the extent of joined up thinking between Core Strategies in the sub-region	The South Hampshire authorities have worked together as PUSH to develop specific policies for the sub-region to include in the South East Plan. All Core Strategies in the sub-region must follow the general policies for the area.	No change required.

Chapter 1 - Introduction

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	3	1.1.3	Query how the Core Strategy can be a sub document of the Sustainable Community Strategy document if it will be completed prior to that documents completion? The Community Strategy should have been completed before the Core Strategy was developed so that comments on the CoSS could be fully incorporated and reflected in the Core Strategy	We have worked closely with the Southampton Partnership on the Community Strategy and undertook a joint consultation on the strategies. The City of Southampton Strategy has now been approved by the City Council	No change required.
GOSE	5	1.2.1	Has consideration been given to the advice in PPS12 (paragraph 1.9) which states that other relevant strategies should be taken into consideration in drawing up LDDs, such as the community strategy.	We have worked closely with the Southampton Partnership and other council departments in developing the Preferred Options paper.	No change required.
Hampshire and Isle of Wight Wildlife Trust	1	1.2.1	It is premature to write the Core Strategy preferred options as changes to the Community Strategy, South East Plan and the Minerals and Waste plans could occur as a result of consultation and the examination in public. Query how the Community Strategy, minerals and waste allocations and any forthcoming key changes will be taken into account.	Although ideally the Core Strategy would have followed the adoption of all of these documents, it is important to update a number of planning policies and therefore not possible to delay the Core Strategy. Any changes made to these documents will be reflected in the Proposed Submission Core Strategy. Further changes may be agreed with the Inspector during the examination.	No change required.
Drivers Jonas on behalf of SEEDA	1	1.4.8	SEEDA considers that there should be a greater certainty of wording of policies at this stage in order for respondents to make meaningful representations and in accordance with paragraph 4.12 in PPS12. SEEDA seeks clarity to establish what exactly will be included as policy, the justification for the policies and how they will be applied.	Note comments. In the preferred options paper we sought to provide sufficient detail on the policies proposed to enable meaningful community involvement, whilst recognising that this stage is not a draft Core Strategy. There will be the opportunity to comment on the Proposed Submission Core Strategy and this will set out policies and justification for them.	No change required.
Natural England	1	1.4.11	Support for the process that Southampton City Council has gone through in drawing up their options and creating their assessment criteria.	Welcome support	No change required.
The Environment Centre	4	1.4.11	We are pleased that the Core Strategy has undergone a Sustainability Appraisal and that some aspects have been deferred until sustainability concerns have been clarified. We would have liked there to have been a greater explanation of the role of the consultants and the process that they followed as part of an introduction to the Core Strategy.	Further information was available on the Sustainability Appraisal in accompanying material, in particular at the Issues and Options stage.	No change required.
GOSE	9	1.4.12	Reference is made to undertaking Appropriate Assessment which will inform the submission stage. Have you considered your approach in the context of "Planning for the Protection of European Sites: Appropriate Assessment".	Appropriate Assessment work has been carried out as part of the background work on the Core Strategy.	No change required.
RSPB	1	1.4.12	Supports – commitment to preparing an Appropriate Assessment under the Habitats Regulations to demonstrate that the policies and proposals of the plan will not have an adverse effect on interests of nature conservation importance.	Welcome support	No change required.

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Friends, Families and Travellers	2	1.5.1	Local authorities should take practical steps to engage with local groups and the local Gypsy and Traveller community.	We have taken steps to consult with local groups through various consultation methods. We will ensure that Friends, Families and Travellers is on our consultation database.	No change required.

Major / additional changes in Proposed Submission Core Strategy:

- Chapter rewritten to provide an overview on the LDF and Core Strategy

Chapter 2 – Southampton in Context

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Trustees of the Barker Mill Estate	1	2.1.1	There is a need for the strategy to look at the wider picture and address the full extent of the wider Southampton City urban area, including its suburbs such as Rownhams and Nursling beyond its administrative boundaries. The administrative boundary should not become a barrier to the sensible and holistic planning of an urban area.	Agree with the need for joint working in the Southampton area and in South Hampshire which is currently taking place through PUSH. This is referred to in the Core Strategy. Further reference should be made in the document to the overall strategy for development in South Hampshire that is set out in the South East Plan.	Amend key issues section on Future Growth to set out the wider planning context and emphasise cross boundary working.
Natural England	2	2.2.1	As the housing allocations from the South East Plan have not yet been confirmed it is likely that any decision on the conclusion of the Appropriate Assessment of the Core Strategy would not be able to be made until the outcome of the EIP is known.	Any changes made to the South East Plan will be reflected in the Proposed Submission Core Strategy where possible. Further changes may be agreed with the Inspector during the examination.	No change required.
Dave Tavendale	1	2.2.1	Concern about the future of Southampton and its increasing lack of direction and initiative compared with other local cities in particular Portsmouth.	Note comments. The City of Southampton Strategy (Community Strategy) aims to set the direction for the city over the next 20 years. The Core Strategy is the spatial expression of the community strategy.	No change required.
Natural England	3	2.3.1	We fully support SCC in striving for a high quality urban environment, we will be happy to give SCC advice on how the natural environment can play a pivotal role in achieving this.	Welcome support	No change required.
City of Southampton Society	2	2.3.1	An imaginative development of the Central Waterfront would be a major contribution to providing a distinctive image and 'sense of place' for the city (see previous representations Oct 03 and Feb 04). Completion of the North-South Spine concept to Town Quay and planned improvements to the Old Town go some way towards creating the image and hold the key to maximising the city's historical/heritage story; an important part of which is to move ahead with a museums strategy.	Note comments. The Core Strategy refers to the need for an accessible and positive waterfront. The policy in the Proposed Submission document will encourage new waterfront development opportunities. Detail on sites will be included in the City Centre Action Plan.	No change required.
Tony Luckhurst	1	2.3.1	Need for an instantly recognisable Logo / icon for the city (and shipping port) of Southampton which says a story about the city and that it is a must to visit. This should be developed to represent the future not the past; not the Titanic image, nor the Spitfire image.	Note comments. The issue of a need for a logo is a corporate one for the council and is not a specific matter for the Core Strategy.	No change required.
Alex Templeton	7	2.3.1	Suggest adding in the word 'sustainable' before 'development outside its boundaries' in the third sentence. Concern that the city cannot promote a strong identity if it does not have one and cannot credibly present only partial truths. It might be wise to remove the phrase 'through image and branding' and re-title this section as it is not about branding but about the vision for the city.	Agree that this section is largely about the vision for the city. The structure of the Proposed Submission paper will be amended to more clearly set out the context, vision for the future and the policies to achieve this.	Incorporate within new spatial strategy section and delete phrase as requested
Alex Templeton	3	2.4.2	The ongoing migration from Eastern Europe also brings significant dis-benefits for some groups, such as low-paid unskilled and semi-skilled construction workers. The LDF should give the full story and be rigorous and coldly factual in its statements.	The paragraph does recognise that there could be adverse impacts from immigrants as well as benefits.	No change required.

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Natural England	4	2.5.1	The changing climate presents many challenges to those planning for the future of Hampshire. With rising sea level, there is a need for coastal re-alignment and new development sites should not affect the opportunity for coastal re-alignment. There will also be an increased risk of flooding and this will have implications for allocation of land close to the coast for development. Increased storminess could result in increased flooding in river valleys. This needs to be carefully considered when assessing the suitability of development sites in the flood plains.	Recognise the importance of mitigation and adaptation strategies to address climate change issues. The Strategic Flood Risk Assessment, prepared for the South Hampshire authorities, will help guide planning policies.	Update and expand the Core Strategy following the receipt of the Strategic Flood Risk Assessment.
Environment Agency	3	2.5.2	Reference drawn to supplementary note to the Flood and Coastal Defence Appraisal Guidance (FCDPAG3) on 'Climate Change Impacts' (Defra, October 2006). This updates allowances for sea level rise and includes sensitivity analysis for increased river flows, extreme rainfall, increased wave heights and high and extreme wind speeds. Consideration needs to be given to the appropriateness of residential developments on brownfield sites in areas at risk from flooding in line with PPG20 and their protection for specific industries.	Note comments The Strategic Flood Risk Assessment, prepared for the South Hampshire authorities, will help guide planning policies. An additional policy on flooding will be added	Update and expand the Core Strategy following the receipt of the Strategic Flood Risk Assessment. Add in flooding policy
Natural England	6	2.5.3	We support the decision of SCC to incorporate existing local decision and management structures in place into the LDF.	Welcome support	No change required.
Environment Agency	2	2.5.4	Suggests that this section be expanded to identify how the Strategic Flood Risk Assessment (SFRA) will inform the submission version. Suggest the following addition – <i>‘the preparation and review of LDDs should be used to review existing and proposed development patterns and allocations and identify opportunities to allocate land in lower flood risk zones. It is suggested that a SFRA may be the best mechanism to facilitate this decision making process in accordance with the PPS25 sequential test’.</i> <i>We would ask that a risk-based approach be applied at all stages of the planning process. This should have the aim of steering new development to areas at the lowest probability of flooding (zone 1)</i>	The Core Strategy adopts a 'reduce and mitigate' approach to flooding. It aims to steer development away from areas at the highest risk of flooding whilst recognising the importance of new development in regenerating areas and creating a vibrant city centre. The Strategic Flood Risk Assessment will help guide planning policies.	Update section and text within the spatial policies section on the waterfront to give more details of the Strategic Flood Risk Assessment.
GOSE	11	2.5.4	Reference is made to a strategic flood risk assessment which will inform the submission version. Query how, in the absence of it, SCC can be sure that it does not impact on the options selected.	Agree that it would have been better to have this information earlier in the process but SFRA was only brought in in draft PPS25 and the Core Strategy had started by then. The SFRA has now been completed and can be taken into account in the Proposed Submission version of the Core Strategy.	Update and expand the Core Strategy following the receipt of the Strategic Flood Risk Assessment. Add in flooding policy
Natural England	5	2.6.1	The changing climate presents many challenges to those planning for the future of Hampshire. With rising sea level, there is a need for coastal re-alignment and new development sites should not affect the opportunity for coastal re-alignment. There will also be an increased risk of flooding and this will have implications for allocation of land close to the coast for development. Increased storminess could result in increased flooding in river valleys. This needs to be carefully considered when assessing the suitability of development sites in the flood plains.	Recognise the importance of mitigation and adaptation strategies to address climate change issues. The Strategic Flood Risk Assessment will help guide planning policies.	Update and expand the Core Strategy following the receipt of the Strategic Flood Risk Assessment.

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Natural England	7	2.6.1	Strongly support the need for clear and strong measures to ensure sustainable development into the future and would be happy to work with SCC to produce guidelines for how new development could reach sustainability targets. We would like to suggest that some aspects of ecological design are incorporated, enhancing the employment development sites where possible, and minimising its impact on the surround area e.g. the retention of wildlife corridors, installation of green roofs, and the use of a Sustainable Urban Drainage System (SUDS). There are also many other biodiversity enhancements that could be incorporated including native planting, wildlife ponds, nest boxes, bat boxes and access points.	Welcome support and suggestions. This approach is proposed in the Core Strategy, in particular in the Fundamentals of Design policy and the policy on Promoting biodiversity and protecting habitats.	No change required.
Alex Templeton	8	2.6.1	Suggest removing the word 'Environmentally' from the sentence "Responding to climate change and making Southampton" - it is not necessary in this context.	Disagree. In this context the document refers to sustainability that relates to the environment rather than economic and social sustainability.	No change required.
Alex Templeton	9	2.6.2	Suggest rewriting the 2 nd sentence - "We must construct energy efficient buildings, refurbish existing housing stock and install renewable generation where feasible". The case for this is incontrovertible. 'Can' should be removed from the last sentence of this paragraph as investment in building does lead to reduced operating costs etc.	This section in the Core Strategy will be rewritten to reflect recent changes in government guidance.	Amend the section on climate change to reflect recent changes.
Ingrid Pettengell-Roese	3	2.6.2	Heating from rocks [geothermal] could be made available for all households in the City so it would be a shining example for the rest of Europe. There should also be larger grants for solar panels.	New developments in the city centre can be attached to the existing CHP system. It is also intended to provide CHP system in the Millbrook area of the city. However, it is not cost effective for individual householders to attach to the existing system.	No change required.
City of Southampton Society	3	2.6.3	We are not familiar with SEERA's Implementation Plan but feel it is necessary for the right degree of professional guidance to be available to, for instance, builders and developers for the successful implementation of the various sustainability measures.	Agree that builders and developers should have appropriate guidance. An SPD will be prepared to give more guidance to developers on this matter.	Amend text relating to climate change policy to refer to the production of an SPD.
Alex Templeton	10	2.6.3	Strongly object. Change final sentence to "New developments will be required to generate a proportion of their own energy, capture rainfall and accommodate waste reduction measures." We have the technology and knowledge to build housing with extremely low emissions and therefore should require that now, instead of building housing that will be completely obsolete and need extensive retrofits and therefore will cost significantly more in the long run.	Note comments. The policy in the document will reflect the recent government guidance on this matter.	Include policy on climate change which refers to low carbon development, energy efficiency, renewable energy, water efficiency and surface water run-off.
Natural England	8	2.7.1	Natural England is pleased that South Hampshire has taken a strategic view to managed growth and we will continue to work with the partnership.	Welcome support.	No change required.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Southern Water Services	1	2.7.1	Support (and look for supporting policies in the Core Strategy that facilitate its delivery) Major investment in additional water, sewerage and wastewater treatment infrastructure will be required to meet the additional demand from the 16,300 new dwellings proposed. These will require detailed engineering investigations and approval by Ofwat and may have long lead times. Delivery of infrastructure improvements needs to be supported by policies to facilitate their construction. Development must not proceed until the additional water, sewerage and wastewater treatment capacity is available.	Welcome support Agree major investment in infrastructure is required. A policy will be included in the Proposed Submission document which deals with Infrastructure and developer contributions.	Include a policy which deals with infrastructure proposals and developer contributions.

Major / additional changes in Proposed Submission Core Strategy:

- **Specific section providing an overview of Southampton added, based on sections 2.1, 2.7 and information previously within the individual Core Strategy: Themes and Core Strategy: Spatial Framework sections**
- **Chapter reorganised into 4 key issues each beginning with a question to be addressed followed by further details of why this is a key issue for Southampton**

Chapter 3 - Spatial Objectives

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Eastleigh Borough Council	1	3.1.1 Spatial Vision	Support the City's vision for 2026, as the region's economic, social and cultural driver.	Welcome support	No change required
Turley Associates on behalf of the Pressmile Ltd	1	3.1.1 Spatial Vision	The spatial vision set out on page 14 is supported. However, it is considered that the vision should refer to the potential of Southampton for accommodating growth and its role as a key location for meeting development needs.	Welcome support The Core Strategy and The City of Southampton Strategy share a vision. The wording of the vision has been agreed by the Local Strategic Partnership and cannot be changed. Section 3 of the document will be amended to refer to the need to accommodate growth.	No change required
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	1	3.1.1 Spatial Vision	Support the Spatial Vision, in particular Southampton's identification as central southern England region's economic, social and cultural driver, building upon its role as an international seaport and leading retail centre (ranked 15 th in Management Horizon's UK Shopping Index 2003/04).	Welcome support	No change required
Environment Agency	4	3.1.1 Spatial Vision	More recognition is required of Southampton's two rivers. These should be a main draw of the city for visitors, businesses and residents with a focus on an enhanced environment and public space to provide access to the waterfront for all. This could also alleviate issues like sea level rise, flooding and manage disturbance to the sensitive habitats and species in the vicinity.	The Core Strategy and The City of Southampton Strategy share a vision. Following consultation on The City of Southampton Strategy the vision statement has been amended to refer to 'adapting into a sustainable waterfront city..'. The vision in the Core Strategy will be amended to reflect this.	Amend the 3 rd sentence of the vision to read 'Adapting into a sustainable waterfront city....'.
ABP	2	3.1.1 Spatial Vision	If this vision is to be achieved, some important issues need to be addressed and resolved, particularly in respect of the Port, without whose expansion the Core Strategy's vision will be difficult to deliver. The dependence of the vision on the success of the Port needs to come out much more strongly in Section 3 to meet the tests of soundness. It should, we suggest, explain that if the Port is unable to expand, the economic growth on which the vision is predicated, will falter.	Agree that the success of the Port is very important to the economy of Southampton. Consider that this point is made clearly in the Vision. Two of the Spatial Objectives refer to the Port. In addition a policy will be added which relates to the Port.	No change required.
RSPB	2	3.1.1 Spatial Vision	Objection – this does not wholly reflect the spatial objectives set out in paragraph 3.2.4 and include any reference to the protection of the natural environment or to achieving sustainable development. Suggest - that the Spatial Vision include a specific reference to the challenges that the city faces as part of its development, these include; protecting the natural environment; achieving sustainable development; addressing the causes and effects of climate change and preventing flooding	The Core Strategy and The City of Southampton Strategy share a vision. Following consultation on The City of Southampton Strategy the vision statement has been amended to refer to 'adapting into a sustainable waterfront city.' The vision in the Core Strategy will be amended to reflect this. Accept that the vision statement does not refer to protection of the natural environment and climate change. Consideration will be given to expanding upon the vision statement in the Proposed Submission Core Strategy setting out the additional spatial matters that need to be taken into account.	Include text in the Proposed Submission Core Strategy that refers to the additional spatial matters that need to be taken into account in the spatial vision in the document.
Alex Templeton	1	3.1.1 Spatial Vision	I would like to see some more radical aspirations in the vision for example carbon neutrality by 2020; freeing up family homes by bringing 2,000 students back on campus; introducing participatory budgeting / decision making for some planning applications;	The climate change target is in line with the goals set in the Energy White Paper. The Core Strategy policy will include detailed requirements for reductions in carbon.	Update climate change policy and SO5, now S16.

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			allocating space in the city for a new business incubator; a year on year increase in the number of eco-homes; buildings designed by architectural competition and world class architects or supporting in principle every planning decision (sic) that increases local production and consumption (e.g. food and fuel networks etc.)	Matters relating to the process of dealing with planning applications are outside the ambit of the Core Strategy. In addition it would not be appropriate to support in principle every planning decision (sic) that increases local production and consumption as in other respects the proposed development may be contrary to established planning policies. Specific allocations of land will be made in the Allocations Development Plan Document and City Centre Action Plan.	
Central Neighbourhoods Partnership and Health & Well Being Partnership	3	3.1.1 Spatial Vision	Suggested adding in text about being a Crime Free City Economic driver - needs to be local business with local business not large multi-national businesses, it should not be at the expense of the cultural heritage. What does Southampton want to be best known for – seaport, cruise port or airport? Need for better Gateways into Southampton Need for a greater emphasis on residents and their well being/their contribution to the city.	The Core Strategy and The City of Southampton Strategy share a vision. Following consultation on The City of Southampton Strategy the vision statement has been amended to include a final sentence which reads: 'Southampton will be known as a city that is good to grow up in and good to grow old in where people are proud to live and economic success is harnessed to social justice'. The vision in the Core Strategy will be amended to reflect this. The City Design team has employed consultants to do some work on the city's gateways. The Core Strategy will encourage a range of businesses and types of jobs in the city.	Amend the Vision to include a last sentence to read 'Southampton will be known as a city that is good to grow up in and good to grow old in where people are proud to live and economic success is harnessed to social justice'.
Communities and Renewal Partnership	1	3.1.1 Spatial Vision	The vision is all about the place (the physical and economic elements), with no direct reference about the lives of the citizens who are the heart of the city. The link between the obvious drive for economic prosperity and the fundamental aim of improving quality of life for <u>all</u> our residents needs to be more explicit. The vision also needs to set out the SCS aspirations for the citizens - these elements are excellently described under "Southampton and its people". Suggest add to Vision – 'Southampton will be an inclusive, environmental sensitive and safe city, with healthy, informed and involved citizens who respect each other and feel good about living here. It will harness its economic success to ensure that citizens have the opportunity to achieve their potential, and no-one is seriously disadvantaged by where they live, their personal circumstances or the community that they belong to.'	The Core Strategy and The City of Southampton Strategy share a vision. Following consultation on The City of Southampton Strategy the vision statement has been amended to include a final sentence which reads: 'Southampton will be known as a city that is good to grow up in and good to grow old in where people are proud to live and economic success is harnessed to social justice'. The vision in the Core Strategy will be amended to reflect this. Consideration will be given to expanding upon the vision statement in a section of the Proposed Submission Core Strategy to include reference to housing requirements.	Amend the Vision to include a last sentence to read 'Southampton will be known as a city that is good to grow up in and good to grow old in where people are proud to live and economic success is harnessed to social justice'. Include a section in the Proposed Submission Core Strategy that refers to the additional matters that need to be taken into account in the vision in the document such as housing.
Public Health, Southampton City Primary Care Trust	1	3.2.4	Support these objectives as consider they will deliver a high quality, urban environment which will directly improve the health of the people of Southampton.	Welcome support	No change required.
ABP	3	3.2.4	Several of these are mutually conflicting in intent and could	Not sure how policies supporting housing and	Include a policy that

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		Spatial Objectives	potentially place serious constraints upon expansion of the Port including policies to support housing, strategic gaps, biodiversity and historic heritage. The document should explain how these will be interpreted in relation to a policy to support the expansion of the Port and place them in a hierarchy of weighting so that future decision-makers know how they should be interpreted.	strategic gaps have an adverse impact on the Port. The PUSH Strategy supports both the Port and the development of housing in the city. A policy will be included that relates to the Port The Spatial Objectives are not intended to be weighted.	relates to the Port.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	2	3.2.4 Spatial Objectives	As a major land holder in the city centre, CGNU can assist the Council in meeting some of these objectives, in particular SO10 with the redevelopment of the Pirelli site and SO13 through the Central Station.	Note comments.	No change required
The Environment Centre	2	3.2.4 Spatial Objectives	There are a lot of admirable targets and aspirations within the Strategy. However, there is concern that the demand for building and economic development may overshadow the good intentions set out in this strategy and that environmental and social gains may be lost. We would like to see these aspects safeguarded by targets, policies and penalties.	Note concerns and agree that it is important that development does not override environmental and social gains. The Proposed Submission version of the document will include policies which safeguard these aspects	No change required.
Turley Associates on behalf of the Pressmile Ltd	2	3.2.4 Spatial Objectives	Support in particular the role of Southampton as a focus for growth which is acknowledged as the first objective (SO1).	Welcome support	No change required.
Savills on behalf of MDL Developments Ltd	9	SO 01	Support	Welcome support However S1 should be amended to clarify that the sub-regional study is that for South Hampshire.	Amend SO1, now S1, to clarify that the sub-regional study is that for South Hampshire.
Alex Templeton	11	SO 01	Unsustainable, ill thought out growth is a driving force behind many of our problems. Suggest changing part – ‘a focus for sustainable growth and investment’	Consider it is not necessary to add sustainable in here as this strategic objective should be read with the others. See also comments for 40/9 above	Amend S1 to clarify that the sub-regional study is that for South Hampshire.
The Environment Centre	12	SO 04	Objection - Raising awareness of future environment issues is more the point at the moment.	SO4 refers to issues relating to the historic built environment and not to past environmental issues. In order to avoid confusion this objective should be reworded.	Amend the last part of SO4 (now S8) to read ‘...raise awareness of issues relating to the historic environment.’
Southern Water Services	2	SO 05	Support water efficiency for residential and commercial development. Water conservation measures such as low flow taps, showers, low flush toilets, and collection of rainwater can help to minimise the amount of water abstracted from the environment.	Welcome support	No change required (now S16)
Mrs Jean Velecky	1	SO 05	Proposed amendments - Discourage further expansion of Southampton Airport.	The city council supports the sustainable growth of the airport.	No change required.
Alex Templeton	12	SO 05	The stated targets do not go far enough. Already the Tyndall centre for Climate Change has amended its targets to 85% carbon reduction by 2030. Significant reductions in CO2 emissions are achievable using current technologies Suggest - “Southampton to reduce citywide CO2 emissions by 85% by 2030, with real progress by 2012.”	This target is in line with the goals set in the Energy White Paper. The policy will be amended to reflect the Council's latest position on climate change.	Update policy on climate change to reflect latest position
West End Parish	4	SO 05	Residents and industries are consuming more and more water and	The intention is to seek less water abstraction in the	Include reference to

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Council			have higher and higher expectations, e.g. showers. Where will the water come from and what will be the cost to the environment of water extraction? Portsmouth currently extracts water from the River Itchen near to West End	future. This will be achieved by water efficiency measures and sustainable drainage systems. The Climate Change policy will deal with this issue.	water efficiency measures and sustainable drainage systems in the Climate Change policy.
The Environment Centre	13	SO 05	Objection - This objective is too large and should be separated into two; Climate Change and the Use of Resources. The climate change dates of 2020 and 2050 are too distant and targets should be set and real progress made, in a shorter timescale. Objection - There is no reference for specific targets for reducing energy, water and material use or even for recycling and waste minimisation. Ambitious targets should be set. Objection - There is also no mention of the constraints to waste minimisation through the use of the incinerator. Incineration leads to inappropriate materials being burnt through a requirement to meet contracts. This needs to be acknowledged and targets set in relation to the amount and type of waste sent for incineration.	CO2 emissions and resource use are interrelated and need to be mentioned together. The climate change target is in line with the goals set in the Energy White Paper. The policy will include short term deliverable targets. The Hampshire Minerals and Waste 'core' Planning Strategy deals with waste management. Targets for recycling and waste management are set in that document.	Update policy on climate change to reflect latest position
Savills on behalf of MDL Developments Ltd	10	SO 06	Support the changes to this Spatial Objective as it will make viability issues less onerous on smaller-scale development	Welcome support	No change required.
Drivers Jonas on behalf of SEEDA	7	SO 06	Supports. However an assessment of the viability of this requirement should be undertaken prior to its adoption to clearly demonstrate that this policy is achievable and ensure that this will not generate other unnecessary indirect impacts.	Welcome support. The Proposed Submission Core Strategy will be in line with a PUSH wide approach on this issue in line with Government guidance. Although the outcome of the South East Plan EIP will not be known until after the Proposed Submission of the Core Strategy we expect that the RSS policy will be significantly reworded. SPD on this issue will be prepared by the City Council and one may be prepared by the PUSH authorities	No change required.
Turley Associates on behalf of Hammerson, Mark Harris	1	SO 06	Object - the wording of SO6 and PPO4 do not conform to Policy EN1 of the Submission Draft South East Plan which seeks to 'encourage' the incorporation of high standards of energy efficiency in all development, subject to economic viability considerations. Suggested changes: SO6 – to support new development which incorporates on-site or nearby renewable energy equipment and/or good quality Combined Heat and Power to reduce predicted CO2 emissions by at least 10% (with increasing percentages required in future years).	The South East Plan is (in part) being led by PUSH on this issue. The Proposed Submission Core Strategy will be in line with a PUSH wide approach on this issue in line with Government guidance. This strategic objective does need to be amended to reflect the City Council's latest position on climate change.	Update policy on climate change to reflect latest position
The Environment Centre	14	SO 06	Objection - Whilst supporting the general objective there seems to be too much emphasis on CHP as the renewable option. CHP should be developed if it is the best renewable option and we should look to develop local sources to feed the station. A short timescale should be set and stated for the reduction of CO2 emissions by 20%.	Acknowledge that there are a range of renewable energy measures. CHP has been highlighted as there is an established network in the city. This strategic objective does need to be amended to reflect the City Council's latest position on climate change.	Update policy on climate change to reflect latest position
Public Health, Southampton City Primary Care Trust	2	SO 08	Welcome the commitment to tackle deprivation and enhance health by reducing inequalities. Could this be changed to 'improve health' rather than 'enhance health'? This would more strongly and clearly	Welcome support. Accept comment with regard to changing 'enhance health' to 'improve health'.	Amend first line of SO8 to read '...and improve health ...'.

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			make the link between reducing deprivation and improving health.		
Communities and Renewal Partnership	2	SO 08	Welcome specific mention of the need to tackle disadvantage (SO8).	Welcome support	No change required (now S11)
Theatres Trust, Rose Freeman	6	SO 10	Strongly support	Welcome support	No change required
Environment Agency	5	SO 10	This does not link with the city's spatial vision and the vision should be altered to reflect this.	Consider that the spatial vision and SO10 (now S3) are not in conflict and the vision does not need to be amended. The vision refers to the regional role of Southampton which is supported by the PUSH strategy. However, some of the city's businesses have an international profile and the vision is right to highlight this.	No change required.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	11	SO 12	Support 16,300 homes in the period 2002-2026 and the intention that all new residential development will be concentrated on brownfield sites within urban areas.	Welcome support	No change required Please note that the dwelling number is no longer within the objective (now S10)
Bovis Homes	2	SO 12	Southampton's housing requirements will be determined by the RSS rather than PUSH. The figure of 16,300 should not be treated as a ceiling as it might increase and a more flexible approach should be adopted and/or reserve sites identified that could be brought into use should the need occur. The housing market is determined by buyers, sellers and economic circumstances rather than local authorities and is dominated by existing stock which the City Council cannot influence. The range, mix and price of dwellings are best left to housebuilders and purchasers. Suggest amending SO12	The 16,300 housing provision figure is in the South Hampshire section of the Regional South-East Plan as part of the 80,000 housing delivery for South Hampshire. It is backed up by DTZ research, and the Housing Needs and Housing Market Survey by David Coultie Associates. Reserve sites, generally Greenfield, are not a part of urban Southampton's Capacity Study which advocates 100% brownfield site usage. The objective should be amended to refer to delivering a mix of housing rather than creating a balanced housing market as this better describes the intention behind the policies.	Delete 'create a balanced housing market' and replace by 'deliver a mix of housing'. Please note that the dwelling number is no longer within the objective (now S10)
Mrs Jean Velecky	2	SO 13	Proposed amendments - Improve cycling facilities so that cycling in the city centre is safe and pleasant and there are cycle lanes beside most roads	The Core Strategy, together with the LTP2, aims to improve cycle accessibility within the city.	No change required. (Now S18)
John Kinghorn	1	SO 13	Agree with the objective to 'ensure that all development is supported by a superior alternative transport system', although there is little in section 4.7 about the role that rail can play in this objective. There is a great opportunity to improve connectivity in the city centre by relocating the Central Station eastwards; this would shorten walking distances to key locations, permit covered access to all main bus routes, and (by rerouting the ring road) reduce pollution in a key location.	Section 4.7 of the Preferred Options document did include reference to the role that rail can play. This will be referred to in the Transport Reduce-Manage-Invest policy CS 19. Any detailed proposal for the redevelopment of Central Station will be included in the City Centre Action Plan.	No change required.
Natural England	10	SO 14	Support - this is key to a high quality urban environment. Natural England is also keen to promote availability of green space, both as a resource for people's health and well being and as a way of alleviating recreation pressures from nearby sites of high ecological	Welcome support	No change required. (Now S12)

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
			sensitivity.		
Mrs Jean Velecky	3	SO 14	Support strongly - we need more open spaces and must protect those we already have (e.g. Civil Service Sports Ground)	Welcome support	No change required.
Bovis Homes	10	SO 14	Some difficult decisions must be taken in order to ensure the provision of publicly-accessible open space and recreational facilities that may well require negotiating with landowners and paying the requisite price to achieve this. The Council's stance to date in respect of the Former Civil Service Sports Field suggests that it is not willing to do this. The Company therefore objects to this inflexibility.	Note concerns over the implementation of policies. The policies in the Core Strategy will form the key principles for development in the city and their successful implementation will require commitments from both the public and private sector.	Amend Proposed Submission Core Strategy to include appropriate reference to City Council funding.
Natural England	9	SO 15	SO15 should be correctly worded to achieve the following; - Safeguard internationally, nationally, regionally and locally designated sites whilst making clear the relative weight to be attached to different designations; - Protection of irreplaceable semi-natural habitat, e.g. ancient woodlands and old orchards and trees of nature conservation value; - Encourage the conservation and management of features of the landscape of major importance for wild flora and fauna; - Protect species and their habitats, especially those with legal protection and those of principle importance for biodiversity conservation; - Identify areas for opportunity for re-linking or recreating wildlife areas	The information Natural England wants included is too detailed for a strategic objective and will be covered by policies in the Core Strategy and the Development Control DPD. However suggest that the wording of SO 15 is amended to better reflect the hierarchy of actions taken with regard to biodiversity.	Amend SO 15 (now S19) to read: 'Conserve and enhance the city's biodiversity, ensuring that designated sites and protected species are safeguarded. Nature conservation opportunities in existing open spaces and new developments will be maximised and local awareness of biodiversity issues is raised.'
Southern Water Services	3	SO 18	Support a 'reduce and mitigate' approach to flooding. In periods of flooding, surface water can inundate the public sewerage system and compromise its functioning and can lead to properties becoming flooded by foul sewage, even relatively remote from the flooded site. To reduce this risk Southern Water fully supports the Council's intention to promote mitigation measures if development is proposed in such areas.	Welcome support	No change required. (now S20)
RSPB	3	SO 18	Objection - the wording of SO18 does not adequately reflect the latest Government advice in Draft PPS25 which requires local authorities to frame " <i>policies for the location of development, which avoid flood risk to people and property where possible and manage any residual risk, taking account of the impacts of climate change</i> ". The RSPB therefore recommends that the objective is re-worded to reflect this advice. " <i>To reduce flood risk to and from new development through location, layout and design, including the application of a sustainable approach to drainage</i> ".	The Core Strategy adopts a 'reduce and mitigate' approach to flooding. It aims to steer development away from areas at the highest risk of flooding whilst recognising the importance of new development in regenerating areas and creating a vibrant city centre. The Strategic Flood Risk Assessment will help guide planning policies	No change required.
Southern Water Services	4	SO 19	Support - to ensure that all development is supported by appropriate infrastructure provision. Development that takes place before the provision of adequate water and sewerage infrastructure can lead to reduced levels of service to both new and existing customers. This includes supply interruptions, poor water pressure, flooding of property and environmental pollution.	Welcome support	No change required (now S5)
Eastleigh Borough	2	SO 20	Support the references to joint working with partners and	Welcome support.	Amend the wording of

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Council			neighbouring authorities.	Need to clarify that the spatial strategy referred to in SO20 (now S20) is the city's spatial strategy	SO20 (now S6) to read "Ensure that the city's spatial strategy...."
Turley Associates on behalf of the Trustees of the Barker Mill Estate	2	SO 20	The Core Strategy should contain a policy that refers to the need to recognise development that lies outside of the City boundaries, but which has implications for City. This should be seen in terms of the potential for such development stimulating the regeneration of an area and in the context of infrastructure delivery. The policy should provide for a positive approach to be taken to such development.	The Core Strategy cannot include a policy that relates to development outside its boundaries as it is not responsible for the implementation of that policy. See also response to Eastleigh borough council's rep above.	Amend the wording of SO20 (now S6) to read "Ensure that the city's spatial strategy...."
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	1	SO - Omission	The spatial objectives should include an objective that, in line with paragraph 1.5 of PPS6, seeks to ensure a good distribution of facilities and services throughout the entire urban area in order to promote social inclusion, encourage investment to regenerate deprived areas, promote economic growth and importantly to deliver more sustainable patterns of development.	Consider that these matters are adequately covered by SO7 and SO8.	No change required.
Turley Associates on behalf of the Pressmile Ltd	3	SO - Omission	An additional objective should be included which refers to the role of the waterfront as an opportunity for accommodating significant growth, promoting tourism and stimulating growth across a key area within Southampton. The redevelopment of run down employment areas and the availability of existing derelict / underused sites should be addressed in the strategy, with a focus on creating a cohesive regeneration area. This will enable the identification and delivery of key infrastructure in a coordinated manner.	Consider that the role of the waterfront is covered by SO1 and SO10. The role of the waterfront is recognised throughout the document. There will be specific policies in the Proposed Submission version of the Core Strategy that relate to the waterfront.	No change required.
Further change needed		SO 16		Rewrite the objective to make clear that the city should be a high quality destination for visitors.	Amend S13 to read 'Ensure that the city reflects the varied culture and heritage of all sections of the community. The city should be a high quality destination for visitors'.

Major / additional changes in Proposed Submission Core Strategy:

- Further details added on the City of Southampton Strategy and its objectives
- Proposed Submission document clearly sets out additional issues not identified in the City of Southampton Strategy to be addressed in the Core Strategy
- Strategic Objectives now referred to as S1, S2 etc to distinguish them from the objectives in the Community Strategy.

Chapter 4.1 – Overarching Themes

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Alex Templeton	5	4.1.1	Problem of delivering high quality design - buildings are being constructed which are pretty much the same as the ones that are currently being built despite design statements that give a glowing description of the proposed development.	Note response. The aims of achieving higher quality design and architecture are an embedded feature of national planning policy (PPS 1) and the emerging regional policy. The requirement for access and design statements for planning applications is given by the Planning Regulations. Guidance / requirements for Southampton, including a locally distinctive design steer will form part of the Proposed Submission Core Strategy.	Ensure that the need for high quality design and the need for quality Access & Design Statements goes into the Proposed Submission Core Strategy
Alex Templeton	13	4.1.1	2 nd bullet point 'Creating a sustainable environment' does not actually make sense. Suggest - 'create a sustainable city to help address the challenge of climate change'.	This theme links with one of the six objectives of the community strategy.	This section has been deleted as the focus on high quality design and a sustainable environment runs throughout the strategy.
Communities and Renewal Partnership	3	4.1.1	The two major overarching themes are also welcomed as they contribute to tackling disadvantage by improving the physical environment.	Welcome support	No change required This section has been deleted as the focus on high quality design and a sustainable environment runs throughout the strategy.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	3	4.1.1	Support the two overarching themes	Welcome support	No change required This section has been deleted as the focus on high quality design and a sustainable environment runs throughout the strategy.
Test Valley Borough Council	5	4.1.1	Welcome the identification of creating a higher quality environment and a sustainable environment as key issues.	Welcome support	No change required This section has been deleted as the focus on high quality design and a sustainable environment runs throughout the strategy.

Major / additional changes in Proposed Submission Core Strategy:

- Chapter deleted

Chapter 4.2 – Built Environment

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	6	4.2.1	Support. Linking green infrastructure into the built environment is key to creating a sense of place; having houses looking onto open space, green corridors or river corridors instead of facing away from them.	Welcome support	No change required
Public Health, Southampton City Primary Care Trust	3	4.2.1	We welcome the acknowledgement that 'design has a crucial role to play in helping to improve people's wellbeing....benefiting public health'. People's safety and perception of safety affect their well-being. 'Designing out crime' is, we believe, more than an aspiration and something that has proven to be successful. We believe this should be clearly stated as an objective/requirement.	Welcome support. Agree with the importance of 'designing out crime' and that there are measures that can be implemented to reduce crime and the fear of crime. Mention should be made in the Fundamentals of Design policy.	Include reference to 'designing out crime' in the Fundamentals of Design policy.
The Environment Centre	15	4.2.6	Objection – The target of 20% (at least) energy production from renewable sources should remain paramount and should remain in the final document. However there should be 5 mile radius (or other set target) for power generation as on-site renewables may not always be appropriate and wind and wave technologies may be better sited elsewhere. However, there should still be commitment to providing on-site renewable generation where practical.	This paragraph referred to the results of consultation on the previous document. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. The Proposed Submission policy will also adopt a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards. A SPD will be produced to provide further details on the implementation of the policy and consider issues such as the appropriate location of renewable energy sources.	No change required
Drivers Jonas on behalf of SEEDA	6	4.2.8	v. – Greater certainty required for the policy wording for a tall buildings policy. SEEDA considers a tall buildings policy may be appropriate in some instances to detail particular design objectives and considerations and show where tall buildings are considered appropriate.	The specifics of tall buildings are matters for SPD (or relevant AAP). The Proposed Submission Core Strategy will include references to CABI guidance as material considerations. Reference to tall buildings will be made in the Fundamentals of Design policy.	Amend the Fundamentals of Design policy to refer to tall buildings.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	4	4.2.8	Support	Welcome support	No change required
Natural England	11	4.2.8	We think there may not be enough scope in 4.2.8 vi <i>Greening the City</i> to adequately address the policies in PPS9.	Noted. The fundamentals of Nature Conservation will be covered by the policies in the Core Strategy	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
RSPB	4	4.2.8	Objection – the key design principles set out in paragraph 4.2.8, particularly the “greening the city” principle and the proposal that the built environment should “enhance” biodiversity, have not been translated into a “Preferred Policy Option”. There is scope within both Preferred Policy Options 1 and 3 to address biodiversity. Recommend that Preferred Policy Options be amended to encourage the promotion of opportunities for the incorporation of beneficial biodiversity features into the design of development and the public realm.	This matter was covered by PPOs 7 & 8 in the Preferred Options document. The will be carried forward in a policy in the Proposed Submission version of the Core Strategy. A section will be added into the design policy referring to biodiversity.	Add in reference to biodiversity in the Fundamentals of Design policy.
Central Neighbourhoods Partnership and Health & Well Being Partnership	4	PPO 01	Developments should fit in with local context	Agree in most cases and this will be incorporated in the written up policy. This will form part of the overall design approach within the Proposed Submission Core Strategy. In some cases a new vernacular of design that actively enhances a poorer character will be appropriate.	No change required
Chamber of Commerce	2	PPO 01	Welcome call for higher density standards and greater respect for the public realm. We must recognise that much of the quality of the public realm lies with the public purse, however, the plan seems to see the private sector paying for it. There are examples of urban management in other European countries with high levels of public spending in town centres. Further concern whether the local authority has the skills to deliver high quality design.	The public sector has budgets to enhance the public realm linked to LTP money and also direct capital spends. However, the burden of place making cannot solely be on the tax payer. Private business actively benefits from a higher value of public realm that contributes to a better city. It is, therefore, right and appropriate that via planning gain new developments fund planned public realm enhancements.	Amend Proposed Submission Core Strategy to include appropriate reference to City Council funding.
Communities and Renewal Partnership	4	PPO 01	Need to ensure that new developments deliver exciting architecture. Designing out crime is very important.	Agree the need for good or very good architecture that respects Southampton’s character and heritage is important. Crime will be recognised in an overall strategic sense, although the detailing of such proposals is more appropriate for SPD.	Revise Fundamentals of Design policy to refer to ‘designing out crime’.
Environment Agency	7	PPO 01	Water efficiency is an integral part of achieving sustainable development for all developments and the Core Strategy should be altered to ensure conformity with any amendments to the South East Plan policy after the South East Plan EiP process. It should set targets against the draft Code for Sustainable homes, December 2006. Suggested rewording for bullet point 1 – <i>‘ensure that resource efficiency and renewables are incorporated in all development proposals integrated with the design to achieve Eco Homes and to an equivalent standard in commercial and industrial developments.’</i> Suggested rewording for bullet point 7 – <i>‘support principles of a quality public realm, a connected and legible city linking deprived areas and opening up an accessible waterfront. Links to and from new and existing development, through sustainable transport links with wildlife corridors, to enhance biodiversity’.</i>	Wording noted. Since the Preferred Options were published the PPS on Climate Change and the Code for Sustainable Homes have been released. The Proposed Submission document will include references to this guidance and seek to enforce some requirements for greater resource efficiency in new developments. The outcome of the South East Plan EiP will not be known until after the Proposed Submission of the Core Strategy. We therefore must view any perceived changes to the RSS with caution. The climate change policy will refer to resource efficiency and renewables.	Update Core Strategy to reflect changes in government guidance

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
GOSE	7	PPO 01	Have you considered the advice in PPS12 (paragraph B17) regarding hazardous installations.	Reference to hazardous installations will be included in the Spatial Strategy section. The existing Local Plan Review policy on the issue will be saved and subsequently reviewed via the DC Policies DPD.	Include reference to hazardous installations in the key principles directing development section.
GVA Grimley on behalf of Development Securities Plc	1	PPO 01	Welcome the overall approaches to the built environment and the aim of building at increased densities to make better use of land and to create sustainable urban environments in line with PPS1. Some flexibility is required with regard to Eco Homes with standards required where feasible and appropriate.	Welcome support for the emphasis of the design policies. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable.	No change required
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	2	PPO 01	The spatial objectives should include an objective that, in line with paragraph 1.5 of PPS6, seeks to ensure a good distribution of facilities and services throughout the entire urban area in order to promote social inclusion, encourage investment to regenerate deprived areas, promote economic growth and importantly to deliver more sustainable patterns of development. This same objective should be carried forward through Policy Option 1 and Policy Option 4.	This issue is considered relevant for the overall spatial strategy and key strategy objectives. The aims of PPO 01 (now CS 13) are to deliver a design led approach to the built environment that will, in part, deliver some of the aims quoted via enhancing the overall urban quality of the city.	No change required
Mrs Moyra Clearkin	4	PPO 01	Concern that Southampton is going to outgrow its infrastructure and will become a less congenial place to live with the natural, historic and built environment all coming under pressure with the increasing population. The very facilities that contribute to quality of life, such as libraries and museums, are threatened with closure.	The overall spatial strategy should ensure that the planned growth is beneficial to Southampton and deliver more sustainable patterns of development. The importance of infrastructure is recognised and therefore a facilitating infrastructure policy will be included in the Proposed Submission Core Strategy.	Add into developer contributions policy reference to Infrastructure Proposals.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	5	PPO 01	Support and welcome recognition of the importance of ensuring an appropriate quantum of development to allow proposals to be economically viable in line with planning policy. Economic viability underpins all development proposals and is vital to ensure inward investment continues in the city centre.	Welcome support	No change required
RSPB	5	PPO 01	Support - the RSPB commends the City Council for including a requirement for development to use sustainable design and construction methods, including resource efficiency and renewables.	Welcome support	No change required
Southern Water Services	5	PPO 01	Support - Southern Water promotes efficient use of water to meet future demand through demand management and development of additional resources to help minimise the volume of water abstracted from the environment. When implemented, specific standards should be promoted relating to water use and we propose that at least four out of six credits available under the Ecohomes assessment for water use should be achieved in new homes. A similar standard would be appropriate for commercial development. Reference could be made to a requirement to meet the standards set out in a more detailed development plan document.	Welcome support Note comments on Ecohomes assessment for water use. A separate policy on climate change and resource use will be worked up from Preferred Policy Option 4. Include further details in forthcoming SPD on how this policy will be implemented.	Incorporate water use in the policy climate change and resource use.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Pressmile Ltd	4	PPO 01	This policy is overly complex and is unclear in its intent, its wording (such as 'responsive design-led spatial approach') and its wider application to the actual spatial strategy that is set out in the remainder of the plan. Much of the text of the policy, whilst relevant, would be better served by being included within the supporting text and all of the bullet points should be removed. Revised wording is suggested: <i>'The spatial framework of the city will be shaped through the integration and application of urban design, heritage conservation and sustainability. The framework will seek to create a high quality urban form'.</i>	Note comments. The preferred policy option is comprehensive and therefore it is agreed that it could be structured differently in the Proposed Submission document.	Add in specific subject headings into policy
New Forest National Park Authority	1	PPO 02	Supporting – higher density development where appropriate; taking into account public transport accessibility, open space provision and the character of the locality.	Welcome support	No change required
Environment Agency	8	PPO 02	In areas where high density is appropriate, consideration must be given for access for residents to the 'outside environment' and to people's quality of life. The best use of brownfield land may involve options reducing flood risk, clearing contamination, protecting and improving biodiversity and enhancing public access to waterside recreation. The need to consider biodiversity on brownfield sites should be an opportunity to optimise potential quality of life gains not a constraint.	Higher density areas will be more clearly set out in the policy and broad spatial strategy. Where appropriate, good quality higher density developments can make the best use of Brownfield land whilst improving biodiversity and delivering high quality of life for both existing and future residents. The aim of the Proposed Submission strategy will be to deliver urban quality and higher levels of amenity. This policy should be amended to delete reference to non-residential development as this matter is effectively covered by other policies which deal with the location of such development (e.g. the sequential approach to retail, offices etc).	Amend the Development Density policy (now CS 5) to delete reference to non-residential development.
GVA Grimley on behalf of Development Securities Plc	2	PPO 02	Should specifically state that densities should be maximised in the City Centre, reflecting accessibility and the proximity of amenities in this area.	Agree that density should be maximised in the City Centre. Higher density areas will be set out in this policy and the broad spatial strategy. The specifics of design in Central areas will be a matter for the City Centre Action Plan or SPD.	Amend policy to set out appropriate areas for higher density development.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	6	PPO 02	Support - delivering higher density of development and ensuring higher densities work through the incorporation of a mix of uses, building styles and integrating sufficient amenity space. Higher densities should be particularly encouraged on sites at the heart of the city centre, such as land between West Quay Shopping Centre and the waterfront.	Welcome support. Agree that density should be maximised in the City Centre. The specifics of sites and design in Central areas will be a matter for the City Centre Action Plan or SPD.	Amend policy to clearly set out appropriate areas for higher density
SEERA	1	PPO 02	We welcome the reference to a density requirement for Southampton in this policy. Add in reference to the overall regional target of a housing density of 40 dwellings per hectare, from Policy H5 of the draft South East Plan: Housing Density and Design.	Higher density areas will be set out in the policy and broad spatial strategy. The design section will (in part) outline the specifics to achieve the spatial vision. The specifics of design will be a matter for SPDs. Although a minimum of 35dph will be specified in the supporting text, this will deliver an overall density in line with the RSS.	Amend the Development Density policy to delete reference to non-residential development.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Pressmile Ltd	5	PPO 02	It is inappropriate to generalise areas of high and low density in such a manner. Each site and proposal for development must be assessed on its own merits and should not be 'pigeon holed' into areas that are defined on a Core Strategy Key Diagram. In this context, it is considered that the policy should be deleted.	Higher density areas will be set out in this policy and broad spatial strategy. In order to be sound, the Core Strategy should give indicative broad locations for development. In a city this should also relate to broad density ranges for different areas. The design fundamentals relating to the approach to density will still be included in a design section.	Amend the Development Density policy to delete reference to non-residential development.
GVA Grimley on behalf of Development Securities Plc	3	PPO 03	Support aim of enhancing the public realm and the street scene, however the policy should allow for improvements to be made by a pool of funds that is contributed to by applicants to ensure no one applicant meets all the cost of local work.	Welcome support. Strategic transport and infrastructure contributions are presently sought via the Local Plan Review and SPG on the issue. This will continue via the Core Strategy. The Proposed Submission strategy will recognise the importance of the public realm and developer contributions, in line with government guidance, will be used to improve it.	Policy deleted – now split between Design and Transport policies
Turley Associates on behalf of the Pressmile Ltd	6	PPO 03	Whilst the objectives set out in this policy are supported, it is unnecessary to include them as a specific policy. The policy is overly complex and its objectives are implicit in other policies contained in the plan and should be deleted.	Welcome support. The public realm, issues of legibility and the streetscene are vital elements of delivering urban quality. It is accepted that, because it links to other policies, this policy should be deleted and the requirements incorporated elsewhere.	Policy deleted – now split between Design and Transport policies
Hampshire and Isle of Wight Wildlife Trust	5	PPO 04	The Trust supports the policies within the Core Strategy that are designed to address the issues of climate change.	Welcome support	No change required
RSPB	6	PPO 04	Supporting - The RSPB commends the City Council for including a very pro-active policy that exceeds current requirements. This policy reflects the Government's aspiration, set out in the Energy White Paper (2003), that energy supplied from renewable sources be increased to 20% by 2020.	Welcome support	No change required
Alex Templeton	2	PPO 04	With regard to housing and new built development, our targets are way too low. Suggest the targets used in Woking should be our minimum target (i.e. that developments go 40% beyond current building regulations on CO2 emissions, extensions to existing dwellings meet best practice standards for energy efficiency and a sustainable water management system is integrated into the design). Fully support generation of as much renewable energy onsite as possible, but not just for the sake of it as, for example, most current model micro-wind turbines will not function effectively in a built environment.	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. This section has been reviewed as since the Preferred Options were published the PPS on Climate Change and the Code for Sustainable Homes have been released.	Revise policy on climate change to reflect government guidance on sustainable development and climate change.
Chamber of Commerce	3	PPO 04	Welcome call for everything to be more sustainable. Concern whether there are enough professionals in the private and public sectors to put this into practice. A flexible interpretation and some public finance will be required.	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. A SPD on climate change will be developed to outline how this policy could be delivered for the use of the public, developers etc.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
West End Parish Council	3	PPO 04	The plan is weak on waste disposal. Residents and industries are generating more and more waste but facilities to cope with this are running out of space, e.g. landfill sites	Although a part of the spatial strategy, issues of Waste are the primary concern of the Hampshire Minerals & Waste LDF that forms part of our own LDF. The importance of infrastructure is recognised and therefore a facilitating infrastructure policy will be included in the Proposed Submission Core Strategy.	Add in to developer contributions policy reference to infrastructure proposals.
Greenpeace	1	PPO 04	Support the council's intentions on renewables and CHP into new developments and its rejection of a less interventionist approach. I would very much like to see existing buildings considered as the council seems to have omitted them from the strategy.	Welcome support. Existing buildings are difficult to tackle via the planning process that deals with new buildings or conversions. Further details of the implementation of this policy will be contained in a SPD. A carbon offset fund is likely to be used to address sustainability in existing buildings.	No change required
GVA Grimley on behalf of Development Securities Plc	4	PPO 04	Support principles of renewable energy and a reduction in carbon emissions but seek recognition that carbon neutrality and a reduction by at least 20% should be sought where they are realistically achievable and appropriate. The objectives of energy efficiency will become easier to meet over time as technology improves and policy should recognise that implementing overly prescriptive policies at the outset may not be economically viable and prevent otherwise positive developments from coming forward in the City.	Welcome support. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. The Proposed Submission policy will adopt a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards.	Amend policy to include a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	3	PPO 04	The spatial objectives should include an objective that, in line with paragraph 1.5 of PPS6, seeks to ensure a good distribution of facilities and services throughout the entire urban area in order to promote social inclusion, encourage investment to regenerate deprived areas, promote economic growth and importantly to deliver more sustainable patterns of development. This same objective should be carried forward through Policy Option 1 and Policy Option 4.	The importance of infrastructure and supporting local neighbourhoods is recognised throughout the Core Strategy. This policy will deal specifically with achieving carbon neutrality and conserving water resources.	No change required
Mrs Jean Velecky	4	PPO 04	Preference should be given to developments which include solar panels as it is easier and cheaper to include these at the planning stage, rather than add them on later.	Welcome support. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. Further details of the implementation of this policy will be contained in a SPD. This will address solar panels and other renewable energy sources.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	5	PPO 04	Strongly objects to the Council's proposed requirements for energy efficiency in new development. It is unduly onerous that all development over 500 sqm must provide a high level of its energy requirement through onsite renewable energy generation and that development should seek to achieve carbon neutrality. PPS22 includes the caveat that policies requiring a percentage of energy use to be from onsite renewable energy generation should apply the requirement only to development where this is viable given the type of development proposed, its location and design and should not place undue burden on developers. Suggest that there should be greater flexibility within any policy to enable appropriate sustainable development projects to come forward, without unnecessarily restrictive requirements unduly affecting the scheme's viability.	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. The Proposed Submission policy will adopt a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards. In addition a SPD will be produced on the implementation of this policy. However the objective of planning is to deliver sustainable development. There is overwhelming evidence of the need to address climate change and therefore without such a policy, it is felt that the plan would be unsound.	Amend policy to include a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards Amend text to state that development should be carbon neutral where appropriate
RPS on behalf of Fairview,	1	PPO 04	Object to the renewable energy proportion unless the viability issue is made clear in the policy. Whilst it is right and proper that energy and sustainability issues are considered, they should not stifle regeneration and development. The cost of such initiatives often is on the developer and, as is not yet reflected in land purchase prices, this could make some schemes unviable and therefore important housing sites may not come forward to be developed.	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. The Proposed Submission policy will adopt a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards. In addition a SPD will be produced on the implementation of this policy. However the objective of planning is to deliver sustainable development. There is overwhelming evidence of the need to address climate change and therefore without such a policy, it is felt that the plan would be unsound.	Amend policy to include a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards Amend text to state that development should be carbon neutral where appropriate
Savills on behalf of MDL Developments Ltd	5	PPO 04	Objection – query how feasible it is for all new development to achieve complete carbon neutrality Suggest removing references to this requirement	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. The Proposed Submission policy will be amended to include an aspiration for carbon neutrality where appropriate and to adopt a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards. In addition a SPD will be produced on the implementation of this policy. However the objective of planning is to deliver sustainable development. There is overwhelming evidence of the need to address climate change and therefore without such a policy, it is felt that the plan would be unsound. Government requirements are for all new homes to be carbon neutral by 2016.	Amend policy to include a sequential and sliding scale approach with requirements linked to the Code for Sustainable Homes / BREEAM Standards Amend text to state that development should be carbon neutral where appropriate

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
SEERA	2	PPO 04	Welcome reference to the issues in Preferred Policy options 4 and 5. The City Council should consider including reference to the regional and sub-regional energy targets in line with policies EN1, EN3 and EN4 of the draft South East Plan.	The South East Plan is (in part) being led by PUSH on this issue. The South East Plan has not yet been adopted. We therefore must view any perceived changes to the RSS with caution. However, we need to ensure that as far as practicable the Core Strategy reflects the need to reduce energy consumption levels.	No change required
Southampton Friends of the Earth	1	PPO 04	Support the emphasis on sustainability, as shown in the promotion of renewable energy, combined heat and power, and energy efficiency in new buildings. We believe that the council needs to develop strategies to improve energy efficiency in existing buildings as emphasis on new development could lead to many more people moving into the area and so increasing the demand for new housing developments. We particularly feel that the council should not be supporting the expansion of the port, as this would lead to increased pollution and congestion in that part of the city centre.	Welcome support. Existing buildings are difficult to tackle via the planning process that deals with new buildings or conversions. Further details of the implementation of this policy will be contained in a SPD. A carbon offset fund could be used to address sustainability in existing buildings. The Port is important within the city and therefore an additional policy will be included in the Proposed Submission document. This will address some of the environmental and transport issues raised. However Port expansion will be a wider issue for regional plans and national government.	No change required
Southampton Greenpeace	1	PPO 04	Support the commitment in these policy options for the incorporation of renewables and CHP into new developments, and supporting the rejection of a less interventionist approach. PPO4 - Omission There is one key omission which needs to be addressed – the Strategy only considers improving energy efficiency, Decentralised Energy (DE) provision etc. in new buildings, not existing ones. Although it is acknowledged that DE is harder to retrofit than include in new build, all buildings should be included for Southampton to truly embrace a DE future.	Welcome support. Existing buildings are difficult to tackle via the planning process that deals with new buildings or conversions. Further details of the implementation of this policy will be contained in a SPD. A carbon offset fund could be used to address sustainability in existing buildings.	No change required
The Environment Centre	5	PPO 04	Support - This is to be broadly commended. In the next stage we would like to see some way of monitoring whether homes achieve carbon neutrality such as a requirement that all new buildings should meet recognised standards of Eco-homes or BREEAM to the highest order. Integration of sustainable energy systems may include CHP but not exclusively. There should be flexibility for solar panels, wind turbines and other micro renewables along with less high-tec solutions. There should be targets for new developments to meet regarding water and resource use.	Welcome support. Monitoring is a matter for planning enforcement (in terms of planning conditions) and the building regulations. The planning process must set a broad framework, in line with the PPS in order for the issue to be integrated with the overall approach to new and existing development.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Southern Water Services	6	PPO 04	<p>Support - Southern Water promotes efficient use of water to meet future demand through demand management and development of additional resources to help minimise the volume of water abstracted from the environment.</p> <p>Support the first bullet point in the policy that aims to ensure that resource efficiency measures, key components of sustainable development, are incorporated in all development proposals to achieve Ecohomes standards. When implemented, specific standards should be promoted relating to water use and we propose that at least four out of six credits available under the Ecohomes assessment for water use should be achieved in new homes. A similar standard would be appropriate for commercial development. Reference could be made to a requirement to meet the standards set out in a more detailed development plan document.</p> <p>Suggest adding in an additional bullet point under the section headed <i>All development must consider its own:</i> -</p> <ul style="list-style-type: none"> • <i>Efficient use of and sustainable infrastructure</i> <p>PPO 4 - Omission Object - a policy promoting efficient use of and sustainable infrastructure is required to allow more detailed policies to come forward in subsequent development plan documents</p>	<p>Welcome support. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable.</p> <p>The Proposed Submission policy will be written more clearly to set out the issues to be addressed, including water use and the standards to be reached.</p> <p>The importance of infrastructure is recognised and therefore a facilitating infrastructure policy will be included within the developer contributions policy in the Proposed Submission Core Strategy.</p>	Add in to developer contributions policy reference to infrastructure proposals.
Turley Associates on behalf of Hammerson	2	PPO 04	<p>Object - the wording of SO6 and PPO4 do not conform with Policy EN1 of the Submission Draft South East Plan which seeks to 'encourage' the incorporation of high standards of energy efficiency in all development, subject to economic viability considerations.</p> <p>Suggested changes: PPO4 - All new development should achieve carbon neutrality (meaning that buildings do not increase the carbon emissions of the city). Buildings and landscapes should be designed to minimise resource use during construction, operation and maintenance and use renewable and sustainably sourced resources efficiently. The City Council will require encourage all developments, either new build or conversion, with a floorspace of 1,000 500-m², or 10 one or more residential units, to incorporate on-site or nearby renewable energy equipment and/or good quality Combined Heat and Power to reduce predicted CO₂ emissions by at least 10 20% (with increasing percentages required in future years). All development should maximise water and resource use efficiency and promote recycling of waste materials.</p>	<p>The South East Plan is (in part) being led by PUSH on this issue. The South East Plan has not yet been adopted. We therefore must view any perceived changes to the RSS with caution. However, we need to ensure that as far as practicable the Core Strategy reflects the need to reduce energy consumption levels.</p> <p>The objective of planning is to deliver sustainable development, a fundamental theme of the Proposed Submission Core Strategy will be to adapt to, and tackle Climate Change. There is overwhelming evidence that backs this up along with new government guidance published since the Preferred Options paper. Without such a policy, it is felt that the plan would be unsound.</p>	No change required
Southampton Greenpeace	2	PPO 05	<p>Support - I would like to support the commitment in these policy options for the incorporation of renewables and CHP into new developments, and supporting the rejection of a less interventionist approach.</p>	<p>Welcome support In the Proposed Submission version of the Core Strategy PPO4 and PPO5 will be combined as one policy.</p>	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	6	PPO 05	Supporting - Glad to see that other forms of renewables are considered important here.	Welcome support	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
Drivers Jonas on behalf of SEEDA	8	PPO 05	Supports. However an assessment of the viability of this requirement should be undertaken prior to its adoption to clearly demonstrate that this policy is achievable and ensure that this will not generate other unnecessary impacts.	Welcome support. Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. A SPD will be produced to provide further details on how the policy will be implemented.	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
Forestry Commission	4	PPO 05	Highlight the contribution of woodfuel and sustainable construction using timber to sustainability through generation of renewable energy, mitigation of climate change and reinvigorated woodland management.	Points noted. These matters, whilst relevant, are too detailed and specific for a Core Strategy, and will be included within a SPD on the issue.	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
GOSE	12	PPO 05	You will be aware of a recent statement by Yvette Cooper in June 2006 indicating that the Government expects "all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable". The statement goes on to say that "Local authorities who are now updating their plans through new local development frameworks should take the opportunity to update their policies in this area". Have you considered the advice in this statement?	Environmental sustainability and measures needed to tackle climate change will be an embedded feature of the Proposed Submission Core Strategy. A degree of flexibility will be needed to make policies on resource efficiency / renewables implementable. Since the Preferred Options were published the PPS on Climate Change and the Code for Sustainable Homes have been released so the policy has been reviewed. The Proposed Submission document will include references to this guidance and seek to enforce some requirements for greater resource efficiency in new developments in line with the emphasis of Government policy to reduce CO2 emissions and achieve Carbon Neutral Homes.	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
Greenpeace	2	PPO 05	Support the council's intentions on renewables and CHP into new developments and its rejection of a less interventionist approach. I would very much like to see existing buildings considered as the council seems to have omitted them from the strategy.	Welcome support. Existing buildings are difficult to tackle via the planning process that deals with new buildings or conversions. Further details of the implementation of this policy will be contained in a SPD. A carbon offset fund could be used to address sustainability in existing buildings.	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
RSPB	7	PPO 05	<p>Objection – Whilst the RSPB supports the principle of Preferred Policy Option 5 which encourages the development of renewable energy installations, the compatibility of these uses with the Solent and Southampton Water SPA and other important habitats, must be considered in accordance with PPS9.</p> <p>Suggested text: The preferred option is to seek strategies and criteria based policies that encourage the development of renewable energy installations, including on-site and larger power generating schemes. It may be possible to utilise Southampton’s waterside location for wind / tidal; the city’s Port location for the import of Biomass fuels and the geological resource of Combined Heat and Power (CHP), <u>subject to any proposed development not having an adverse effect on the integrity of the nationally and internationally designated nature conservation sites in and close to Southampton Water</u></p>	<p>This policy is one aspect of a general approach of the Core Strategy to ensure that development is supported by adequate infrastructure. The policy option has been assessed via the SA/SEA and AA process. Detailed guidance will be included in a SPD which will address issues such as this.</p> <p>In addition there will be a policy in the Proposed Submission document that relates to the natural environment so it is not necessary to include the details in the policy relating to renewable energy.</p>	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
SEERA	3	PPO 05	The Assembly welcomes the reference to these issues in Preferred Policy options 4 and 5. The City Council should consider including reference to the regional and sub-regional energy targets in line with policies EN1, EN3 and EN4 of the draft South East Plan.	The South East Plan is (in part) being led by PUSH on this issue. The South East Plan has not yet been adopted. We therefore must view any perceived changes to the RSS with caution. However, we need to ensure that as far as practicable the Core Strategy reflects the need to reduce energy consumption levels	Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.
Southampton Friends of the Earth	2	PPO 05	Southampton Friends of the Earth supports the emphasis on sustainability, as shown in the promotion of renewable energy, combined heat and power, and energy efficiency in new buildings. We believe that the council needs to develop strategies to improve energy efficiency in existing buildings. We are concerned that there is a lot of emphasis on new development, which could lead to many more people moving into the area and so increasing the demand for new housing developments. We particularly feel that the council should not be supporting the expansion of the port, as this would lead to increased pollution and congestion in that part of the city centre.	<p>Welcome support. Existing buildings are difficult to tackle via the planning process that deals with new buildings or conversions. Further details of the implementation of this policy will be contained in a SPD. A carbon offset fund could be used to address sustainability in existing buildings.</p> <p>The Port is an important employer within the city and therefore an additional policy will be included in the Proposed Submission document. This will address some of the environmental and transport issues raised. However Port expansion will be a wider issue for regional plans and national government.</p>	<p>Combine PPO4 and PPO5 into one policy and update to take account of recent government guidance.</p> <p>Add in policy and text on the Port including reference to transport issues</p>

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 1 Overall Approaches to the Built Environment – now CS 13 Fundamentals of design (also incorporates PPO3)**
 - **PPO 2 Development Density – now CS 5 Housing density**
 - **PPO 3 Legibility, Understanding Streets & the Public Realm – deleted and split between design and transport policies**
 - **PPO 4 Design of the Built Environment meeting Environmental Sustainability Objectives – now CS 20 Tackling and adapting to climate change (resource use)**

- **PPO 5 Proposals for Renewable Energy Developments – incorporated into CS 20 above**
- **Policies and reasoned justification now split between chapter 4 ‘Spatial strategy and policies’ and chapter 5 ‘Key requirements for successful development’**

Chapter 4.3 – Historic Environment

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Central Neighbourhoods Partnership and Health & Well Being Partnership	5	4.3.2	Need to keep our heritage, encourage and promote to all neighbourhoods, particularly Priority Neighbourhoods.	Comment noted.	No change required.
Public Health, Southampton City Primary Care Trust	4	4.3.4	We welcome this new section and the acknowledgement of the importance of roots and identity for Southampton to flourish.	Welcome support.	No change required.
Communities and Renewal Partnership	5	PPO 06	Particular attention needs to be paid to new developments next to the city walls. Recent developments have hidden them.	Town walls need to be protected visually from new development, particularly in the West Quay III area. Policy HE1 in the adopted Local Plan Review states that any new development affecting a Conservation Area should preserve or enhance its character and appearance. This statement needs to be re-emphasised in the Core Strategy.	Add in sentence to text emphasising the importance of protecting views of the Town Walls.

Major / additional changes in Proposed Submission Core Strategy:

- Policy change;
 - PPO 6 Historic Environment – now renumbered CS 14
- Policy and reasoned justification moved to chapter 5 ‘Key requirements for successful development’

Chapter 4.4 – Natural Environment

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	7	4.4.1	Support the protection of the natural environment and that the main objective should be to protect and enhance Southampton's existing habitats in accordance with Southampton's Biodiversity Action Plan.	Welcome support	No change required
Forestry Commission	1	4.4.2	Planners should note the importance of trees and woodland, in particular ancient woodland, in the landscape, character and biodiversity of the South East and to ensure high quality of life around new developments. The Forestry Commission is keen to work with Southampton City Council to make the most of its neighbouring woodland holding in this respect.	The importance of trees and woodland is acknowledged. Welcome the offer to work with the Forestry Commission.	No change required
Public Health, Southampton City Primary Care Trust	5	4.4.2	We welcome the statement that a benefit of a high quality natural environment will be improved physical and mental health.	Welcome support	No change required
Natural England	12	4.4.3	We commend Southampton for identifying the issues in 4.4.3 and would recommend that the areas needed for nature conservation, the functioning of the natural processes and opportunities for biodiversity are marked clearly on a map and taken into consideration at the very earliest of planning stages. The Biodiversity Action Plan will provide suggestions for projects to reduce habitat fragmentation and opportunities to re-link where fragmentation has already happened. New development can provide excellent opportunity for biodiversity enhancement outside designated sites. We would be happy to support the further documents (SPD or otherwise) as suggested in option 8 to conserve and enhance the natural environment. In addition these policies if implemented correctly should also add value to SO14.	Welcome support Specific sites will be identified in the Allocations DPD and further documents. The Local Plan Review Proposals Map, which shows the designated sites, will continue to be in use. This map will be updated as the city's proposed DPDs are adopted.	No change required
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	7	4.4.6	Our client welcomes the acknowledgement of Circular 5/05 in respect of the potential for developer contributions for habitat creation schemes. The Policy appears to be sufficiently flexible, and such consideration and reference to the Circular should also be made when formulating and producing related LDF documents.	Welcome support Developer contributions requirements in the Core Strategy will be developed in line with Circular 05/05	No change required
Hampshire and Isle of Wight Wildlife Trust	4	4.4.8	The Trust would like to see this section as a policy within the Core Strategy.	Note comments. National planning policy will ensure that no development will be permitted that will have an adverse impact on European environmental designated areas. Policy CS22 of the Proposed Submission draft will set out the general approach to the natural environment.	No change required
Hampshire and Isle of Wight Wildlife Trust	2	PPO 07	Support - The Trust wholeheartedly supports and welcomes this policy. It is also welcoming to see the importance of inter-tidal mudflat habitats outside of designated areas recognised.	Welcome support Please note PPO 7 (now CS 22) incorporates PPO 8	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	10	PPO 07	There is little reference to the implications of the Port activity and expansion on the environment. In maintaining and improving port facilities, any encroachment into tidal rivers and estuaries must take into account the effects on protected habitat, water quality and public access to the water.	The Proposed Submission Core Strategy will include a specific section and policy on the Port. The policy will refer to the impacts of the port on the environment. We will continue to work with the Port in order to reduce the negative impacts of port activity and growth. However, planning has only limited scope to restrict or affect port activities. Please note PPO 7 (now CS 22) incorporates PPO 8	Include a policy which refers to the Port.
GOSE	13	PPO 07	Does the intended policy distinguish between the hierarchy of various designations, as indicated by PPS9 (paragraphs 5, 6 to 9)? In view of this, has the SA given proper weight to the hierarchies of international, national, regional and local designations? Were you intending to indicate the location of these designations on the key diagram?	The policy seeks to protect and enhance designated sites. The Proposals Map will show designated sites and will be updated regularly to reflect the changes in policy as the LDF progresses. In addition, more detailed policies will be contained in later documents. Please note PPO 7 (now CS 22) incorporates PPO 8	No change required
Hampshire & Isle of Wight Wildlife Trust	3	PPO 08	The Trust supports this policy	Welcome support The policies on open space and the natural environment have been rewritten with PPO 8 incorporated within former PPO 7 (now CS 22)	No change required
GOSE	14	PPO 08	Have you considered indicating those broad areas for the restoration or creation of new priority habitats which contribute to regional targets?	These will be considered in the Allocations DPD and further documents The policies on open space and the natural environment have been rewritten with PPO 8 incorporated within former PPO 7 (now CS 22)	No change required
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	8	PPO 08	Acknowledge that development outside designated sites can enhance biodiversity through the creation of new habitats, however, it is important that decisions are made on a site by site basis and that all developments are not required to create such schemes or provide developer contributions. This could lead to investment being redirected to other centres and could conflict with other key objectives. Suggest that the Core Strategy set overall biodiversity objectives but recognises that specific contributions from new development should be assessed against the wider benefits it secures.	This policy establishes the principle of requiring new developments to consider the natural environment. It will be redrafted to ensure that development retains, protects and enhances features of biological interest and provides for the appropriate management of these features. The policies on open space and the natural environment have been rewritten with PPO 8 incorporated within former PPO 7 (now CS 22)	Policy to be redrafted with a more strategic approach

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	7	PPO 08	Objection - The Core Strategy will provide a framework for future LDF documents to consider natural environment requirements for new developments. This should include the provision of information in order to consider the impact on wildlife when making planning decisions. Suggested change: The Core Strategy will provide a framework for future LDF documents to consider natural environment requirements for new developments. This will include the provision of information in order to consider the impact on wildlife when making planning decisions.	Requirements will vary between sites, depending for example on their location, original use and size. The policy will be redrafted to ensure that development retains, protects and enhances features of biological interest and provides for the appropriate management of these features. The policies on open space and the natural environment have been rewritten with PPO 8 incorporated within former PPO 7 (now CS 22) This policy is worded to reflect this.	No change required
Environment Agency	13	PPO 08	If Southampton City Council does not consider that there is a need for detailed policies with regard to green infrastructure, this type of policy issue is appropriate for a DPD or SPD and we would like to work closely to develop a strategy for strategic opportunities for habitat restoration and detailed guidance. Currently the plan fails to secure economic benefits from high quality environments and to reduce the increasing economic and social costs of environmental degradation. A policy should be put into the plan to reduce the ecological footprint for example <i>'to reduce the rate of increase in Southampton's ecological footprint, stabilise it and seek to reduce it by 2016, with increasing rates of reduction up to 2026'</i> . Suggested rewording for PPO8: <i>Wildlife and <u>the potential for wildlife also existing outside of designated sites and therefore new development should:</u></i> <i>A). Provide information and protect the existing natural environment;</i> <i>B). Enhance biodiversity including creating new habitats;</i> <i>On small scale developments this may involve, for example the installation of <u>bat boxes, planting of native trees and consideration of wildlife corridors from that site to adjacent sites. On large scale developments, for example, this may include appropriate landscaping to link developments with surrounding habitats, creation of new habitats in traditional forms or consideration of innovative solutions such as green and grey roofs.</u></i> <i>The Core Strategy..</i>	Creating a sustainable environment is an important theme throughout the strategy. Welcome detailed comments on policy PPO8 wording. The policies on open space and the natural environment have been rewritten with PPO 8 incorporated within former PPO 7 (now CS 22).	Policy to be redrafted with a more strategic approach Consider detailed policy wording in Development Control DPD
The Environment Centre	8	4.4.9	This option should not have been rejected.	The Core Strategy sets out the general principles for development. Further documents will expand on these and include detailed policies.	No change required

Major / additional changes in Proposed Submission Core Strategy:

- Policy change;
 - PPO 7 General approach to the Natural Environment – now CS 22 Promoting biodiversity and protecting habitats
 - PPO 8 New Development and the Natural Environment – now incorporated into CS 22
- Policy and reasoned justification moved to chapter 5 'Key requirements for successful development'

Chapter 4.5 – Employment

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Alex Templeton	4	General	I'd like to see 'economic growth', where it is referred to, to be described as 'sustainable economic growth' to prevent continuing the mistakes of the past.	The chapter addresses aspects of sustainability (e.g. accessibility, habitats, etc)	No change required.
Public Health, Southampton City Primary Care Trust	6	4.5.2	The emphasis in section 4.5 seems unbalanced. There is a specific section here on The Port and Marine Industries and yet no specific mention of health and social care as a major employer. It would be helpful to acknowledge this in this section, and also to mention the development of the RSH site as a new City Centre Health Campus (to include a major independent sector treatment centre, community hospital, adult mental health inpatient unit and primary care delivery centre) and community based primary health care.	The health sector's first significance is as an important service to the community. Health facilities are not promoted to meet economic objectives per se (at least, not directly), even though they are a major employment sector. Health facilities also present different spatial planning issues to an industrial estate (whereas the port and marine sector present issues more closely related). This is why Health is addressed elsewhere in the core strategy. Other major employment sectors like retail and education are also addressed elsewhere for similar reasons. It is agreed that the health and social sectors are major employers in the city. This is already referenced in the section "terminology". The title can be changed to better reflect the significance of these sectors. The plans for the RSH represent a significant proposed change in the city's infrastructure and are now referred to in the health policy.	Amend title of box from "Terminology" to "Employment Sectors"
City of Southampton Society	4	4.5.3	Query what specific steps are planned to increase skills levels?	Many actions are taken in the education sector, learning and skills council and private sector, outside the scope of the planning system. However within the scope of planning, the specific measure is to seek "Access to Jobs" agreements to help local people benefit from jobs in new development. See PO12, para 4.5.27 onwards. There is specific reference to training / skills.	No change required.
Highways Agency	1	4.5.4	The provision of infrastructure should be in accordance with DTLR Circular 04/2001.	This refers to a bullet point near the start of the chapter to providing "appropriate infrastructure" to promote economic performance. This is intended to be a general comment, to cover a range of economic infrastructure, for example: transport, information technology networks, business / skills centres, etc. (This is now spelled out). Reference to a specific circular in this context is too detailed. In any case, from the Highway Agency web site's summary, it appears the circular is more concerned with assessing the impacts of development on the existing trunk road infrastructure, which is a different issue to providing new infrastructure.	No change required.

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Natural England	13	4.5.4	We understand that economic development is key for SCC to achieve the regional average, however increased industry can also have increased impacts on pollution and loss of tranquillity and SCC should make it clear how these impacts might be over come for example by sustainable transport options or lighting specification. Employment development should also provide opportunities for open green space and biodiversity gain. We would expect that any Area Action Plans or preferred options for Port and Marine Industry will have the relevant level of consideration in regards to environmental constraints.	Acknowledgement of economic objectives is welcome. The Core Strategy already promotes a focus for economic development (particularly for offices) at public transport locations and seeks enhanced public transport provision. The Council believes the appropriate assessment / sustainability appraisal demonstrates the suitability of the Core Strategy's approach to employment, subject to relevant mitigation measures. The potential for mitigation measures including measures to promote biodiversity covers all types of development and therefore a separate policy on biodiversity covers these issues. Much employment development in the city will involve the redevelopment of existing industrial sites rather than new development; or will involve promoting office development in the city centre close to public transport to reduce pollution. The section on the Port includes environmental issues and this is now incorporated into the port policy.	Amend the supporting text to cross refer to requirement for mitigation measures as set out in separate policies.
Chamber of Commerce	4	4.5.6	Request for more information on: <ul style="list-style-type: none"> - Population change - How increases in population and 3.5% growth translates into employment floorspace - Split between office and 'other' floorspace - Where new city centre office and non-office employment space will be located 	It is considered the preferred option does set out the regional + South Hampshire strategy. The 3.5% target is translated into a city region (e.g. SW Hants) overall floorspace target. PUSH have now produced an apportionment of these figures to Southampton and so these are now included. Following comments from GOSE the spatial strategy now includes guidance on the likely distribution within different areas of the city. Otherwise, in terms of locations, the city wide targets set the context for safeguarding existing employment sites / allocations around the city. Specific locations for office development within the city centre are a matter for the action plan. Under the South Hampshire strategy, Southampton's population is expected to rise from 223,000 (2006) to 231,000 (2026). More information has been sent to the Chamber.	Amend text: Make specific reference to the 3.5% growth target. Provide floorspace targets in policy.
Drivers Jonas on behalf of SEEDA	10	PPO 09	Agrees with the general policy taken and considers the policies are sufficiently flexible to allow a range of business models to be followed.	Welcome support	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
GOSE	16	PPO 09	Paragraph 4.5.18 states that a full employment land assessment will be undertaken to inform a review of the safeguarding of individual employment sites undertaken as part of the Site Allocations DPD. Is it your intention to include the quantum employment floorspace figures which are to come forward in the Core Strategy over its lifetime? PPS12 (paragraph 2.10) states that the Core Strategy should set out the long term spatial vision for the authority's area and the strategic policies required to deliver that vision. It should set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development. PPS12 (paragraphs 4.2 and 4.3) refers to the importance of front loading. Non Core Strategy DPDs should be in conformity with the Core Strategy. With the approach you are proposing, do you consider that there will be a sufficient "hook" in the Core Strategy in order to provide a chain of conformity for the employment DPD.	The preferred options core strategy had provided city region targets and set out the existing spatial concentration of employment in the lower case text. In the light of GOSE comments, and further work by PUSH on employment apportionment, the core strategy has been amended to provide a clearer direction on employment targets and distribution. One of the key issues is retaining existing employment land and this is now covered by a policy. Therefore it is considered the core strategy does now provide clear guidance to subsequent DPDs.	Insert city wide employment targets into policy (including city centre focus for office development). Insert likely distribution of industrial / warehouse development within the city into the spatial strategy. Translate the approach on employment safeguarding into a policy.
SEERA	4	PPO 09	The Assembly welcomes the reference to the economic objectives of PUSH, SEERA, SEEDA and central Government as key considerations in the City Council's approach to employment development. It is important that the employment policies reflect the principles in Policy RE2 of the draft South East Plan.	Welcome support. The Core Strategy's approach is considered to be in general conformity with the overall approach in policy RE2 and the South Hampshire policies of the South East Plan, particularly with clarifications at Proposed Submission stage.	No change required.
Test Valley Borough Council	3	PPO 09	Request that this makes clear that most of the employment development supporting growth of the city will be located in sustainable locations within the city.	This is established in the chapter: in the aims; and in the approach to office development. However it is agreed these issues should be made more explicit in the approach to safeguarding	Amend criteria for reviewing safeguarded sites to include accessibility.
Turley Associates on behalf of the Pressmile Ltd	7	PPO 09	Object - This policy has no specific meaning and simply supports strategies set out by other bodies and central Government. The general approach to employment should be supported by a positive policy that seeks to maximise the potential of Southampton and to promote the regeneration of older employment sites, in order to meet the needs of the market. The policy should be amended to reflect this aim.	It is agreed that this policy simply cross refers to other strategies. In terms of what Government policy expects core strategies to do, it would be better to translate these strategies into specific aims for Southampton in an overarching policy.	Redraft PO9 to provide a more specific overarching economic development policy for Southampton
Southampton Partnership	3	4.5.7	The Southampton Partnership expressed concern regarding the new office floor space target and whether we actually need all this additional floor space given perceptions that there are already a number of empty offices around the city.	In terms of meeting the long-term economic growth aspirations for South Hampshire set out in the South East Plan, a growth in business services (and hence offices) is a key component.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
City of Southampton Society	5	PPO 10	Bearing in mind the significance of the Town and District Centres with good infrastructure and transport links, we suggest they can provide suitable locations for significant office development and relieve pressure on the City Centre.	For major office development, Government policy promotes a city centre location, partially to promote a switch to public transport use. This is considered to remain appropriate for Southampton. The city centre is the major focus for the public transport system and there is capacity in that system. However in terms of the application of Government policy, the promotion of economic growth in South Hampshire, and the promotion of Southampton's town / district centres, it is agreed it is appropriate to provide flexibility for medium scale schemes.	The policy to state that office proposals of 1,500 sq m or less in town / district centres need not consider city centre locations first.
GOSE	17	PPO 10	Paragraph 4.5.18 states that a full employment land assessment will be undertaken to inform a review of the safeguarding of individual employment sites undertaken as part of the Site Allocations DPD. Is it your intention to include the quantum employment floorspace figures which are to come forward in the Core Strategy over its lifetime? PPS12 (paragraph 2.10) states that the Core Strategy should set out the long term spatial vision for the authority's area and the strategic policies required to deliver that vision. It should set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development. PPS12 (paragraphs 4.2 and 4.3) refers to the importance of front loading. Non Core Strategy DPDs should be in conformity with the Core Strategy. With the approach you are proposing, do you consider that there will be a sufficient "hook" in the Core Strategy in order to provide a chain of conformity for the employment DPD.	See response to GOSE point 16 above	See response to GOSE point 16 above
GVA Grimley on behalf of Development Securities Plc	5	PPO 10	These principles are sound, however the policy should clarify that within a classification such as Southampton City Centre each office site will be judged equally rather than preferences being for particular locations.	Detailed planning within the city centre is the remit of the City Centre Action Plan. The action plan's issues and options paper suggests one option that parts of the city centre may not be appropriate for major commercial development (e.g. St Marys). However this Core Strategy policy was not in itself intended to provide any priority to some sites in the city centre over others. It is recognised that unintentionally the policy wording is slightly ambiguous on this point.	The policy has been revised for other reasons and this has removed this ambiguity
Highways Agency	2	PPO 10	Minimum thresholds triggering approval should be removed because of the potential undesirable impact of small developments on the trunk road network. Each application should be determined on its own merits based on the impact of the development traffic on the trunk road network rather than just on the size and type of development.	The policy does not mean office development will automatically be permitted under the stated size threshold. Any proposal would still need to comply with other policies, including in the transport chapter. The policy simply means a small scale office development does not need to consider alternative locations. This is considered a sensible application of the Government's sequential approach policy.	No change required..

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
La Salle Investment Management on behalf of Coal Pensions Properties	1	PPO 10	Support. Our clients support the approach taken to the location of office developments within Policy 10. It is considered that City Industrial Park would meet the criteria referred to within the policy option as a site suitable for office development.	Welcome support. It is noted you seek no specific change at this stage. Specific sites are the remit of the Action Plan (its issues and options paper flags up potential options for the site, including offices)	No change required
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	9	PPO 10	Support	Welcome support	No change required
Turley Associates on behalf of the Pressmile Ltd	8	PPO 10	This policy is overly restrictive; it seeks to apply a 'sequential approach' to office development and should be removed. Government guidance sets out adequate advice regarding the location of offices. In addition to objecting to the principle of this policy, it is noted that the wording is also inappropriate, with no definition of what constitutes 'available' and the policy lacks any flexibility to allow for development in locations to support regeneration or to reflect existing land uses.	The policy has been revised and now translates the PPS6 sequential approach into a specific approach for the city (e.g. with site thresholds etc). PPS6 provides general advice regarding availability and considering alternative sites. Whilst the sequential approach will be a key consideration for all office development, it is recognised that regeneration may also be a consideration in an urban environment like Southampton (as recognised in PPS6). It is considered the reasons underlying the sequential approach are very strong (e.g. promoting sustainable travel, supporting central urban regeneration / social inclusion, and city centre vitality). Therefore the Core Strategy should clearly indicate only specific and strong regeneration benefits could outweigh this.	Amend supporting text to include regeneration considerations.
GOSE	15	4.5.12	It appears that the list of locations is referring to the sequential test? The list does not appear to fully accord with the advice in PPS6 (2.44) and Annex A.	Yes, this is the sequential approach. It is assumed the representation relates to the Core Strategy's flexibility to sites within 500m of Southampton main railway station and outside the city centre. The approach should also reflect PPS para 2.41: office developments draw from a city region travel to work area. Southampton rail station provides far better public transport connections to this wider area than the bus routes serving the city's smaller centres. PPS6 is general national guidance. The Core Strategy is responding to local circumstances and the geographical position of the central railway station.	No changes required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
La Salle Investment Management on behalf of Coal Pensions Properties	2	4.5.12	Object. Whilst a sequential approach of office development is supported, sites located on the edge of the City Centre should be listed as the third preferred office location as they are more appropriate and sustainable for office development than sites in town centres and district centres. Paragraph 4.5.12 should be amended to reflect this.	(Read in conjunction with response to GOSE above). The policy has been revised for other reasons and now cross refers to PPS6. PPS6 Annex A defines centres to include city, town and district centres. Placing edge of centre locations above locations in centres is contrary to PPS6 and therefore requires careful justification. This is why the Core Strategy only prioritises sites within 500m of the station. Although not clear it is possible from PPS6 Annex A that other sites within 300m of the city centre boundary could also be classed as edge of centre for office development. In approximate terms, taking a "middle of the range" example, Onslow Rd is 300m from the boundary. This is about 1.5km from the main railway station. In this location the balance of the argument switches back to following PPS6. (For other edge of centre locations, the distances are significantly greater).	No change required.
La Salle Investment Management on behalf of Coal Pensions Properties	3	4.5.14	Floorspace requirements for office developments may need to be satisfied sooner than 5 years. The requirement to wait for alternative sites to become available will need to be carefully applied to ensure that it does not frustrate economic development within Southampton.	Agreed. The paragraph states this approach needs to be applied flexibly. Whilst no change is sought in the detailed rep, it is considered on reflection a 5 year test is too rigid and unrealistic. It is not in line with PPS6's comments on flexibility, or on considering availability on the merits of an individual case.	Amend text / policy to simply cross refer to PPS6
Drivers Jonas on behalf of SEEDA	11	4.5.18	SEEDA welcomes the proposed review of employment land and seeks to remain closely involved in this review.	Welcome support and commitment to be involved in this review	No change required
New Forest District Council	1	4.5.18	This Council supports the decision that a full employment land assessment will be conducted to inform a review of the safeguarding of individual employment sites. Furthermore the council is supportive that the review will be conducted against the context that there is a strong need to safeguard employment sites in the city so most (and possibly all) existing employment sites will be safeguarded.	Welcome support	No change required.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Atis Real on behalf of Ordnance Survey	1	4.5.19	<p>Object – the text is too restrictive and prescriptive in advance of a full employment land assessment. The criteria against which the review will be undertaken fail to recognise Policies SH6 and SH7 of the draft South East Plan.</p> <p>In relation to the last bullet point in 4.5.19, it may be appropriate, in planning terms, for a mixed-use redevelopment to ‘retain and enhance the level of employment floorspace’.</p> <p>Suggest deleting the first two sentences in 4.5.19 and amend to: The review will take into account:</p> <ul style="list-style-type: none"> - The criteria expressed in the draft South East plan for the allocation of employment sites – namely that they should meet all of the following – - i). Provide for the needs of firms, recognising that most demand will be for business services, distribution and advanced manufacturing - ii). Be in locations which meet business requirements - iii). Be capable of being developed within the required timescale - iv). Ideally be accessibility by a variety of means of transport - The suitability of the site for employment use in planning terms - The environmental sustainability of the site and the development proposed including consideration of biodiversity and the Habitats Regulations - The location specific employment needs a site meets (e.g. for waterfront marine uses) - The ability of a site given its specific location to deliver, through redevelopment, strong planning/regeneration/ economic benefits which cannot be delivered elsewhere. The first preference, in such circumstances, will be for high density mixed use redevelopments. 	<p>General Government guidance promotes positive planning to meet needs for economic development and housing, and the effective use of land. It seeks enough sites for business and housing needs, and consideration of whether industrial / commercial land should be reallocated to housing. The South East Plan seeks that well located / accessible employment sites should be retained where there is good prospect of employment use. Specifically for South Hampshire, the South East Plan seeks increased economic growth focussed on urban areas. To achieve this it states that existing employment land in South Hampshire should be safeguarded; and sets a requirement for a net additional 1 million square metres of employment floorspace in the Southampton city region. The requirement is particularly for office development, but also (to a lesser extent) for warehouse and then manufacturing development. It also sets a requirement for 16,300 new dwellings in Southampton. To achieve the economic growth and net additional floorspace targets, focussed on urban areas, indicates that no or little existing employment land in Southampton should be lost. Further evidence is drawn together in the background paper: “Employment Land Safeguarding”. It refers to the availability of employment space being relatively limited (e.g. low vacancy rates). With an improvement in economic performance in the medium / long term (compared to past trends), this situation would become more acute. A loss of existing employment land would make it more difficult to achieve the significant net increase in employment floorspace required to meet overall growth objectives, particularly with an urban focus. It would also reduce the stock of land available to promote economic growth through the more effective use of land: redevelopments to higher density office based employment (where appropriate) or higher grade employment space. It would also reduce the amount of space available for existing businesses, including those of lower financial value, required to support economic growth. Government guidance (PPS12) states that core strategies should set a clear spatial vision for their area, identify broad locations for employment / housing growth, and provide certainty for the future....(continued below)</p>	<p>Amend text to state that where there is clear evidence a site is not and will not become viable for employment use, it will be released for other use, with first preference given to a mix of uses including employment. Otherwise most or all sites will be safeguarded.</p> <p>Amend text on assessing safeguarded employment sites to make specific reference to planning issues: proximity to deprived areas, accessibility, residential amenity.</p>
Chapter 4.5 Employment					

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
				<p>.....continued.....If the Core Strategy simply set out a neutral framework for the assessment of sites at the DPD stage, it would not achieve this. The above position indicates it is appropriate for the Core Strategy to take a strong overall approach to safeguarding employment land, to provide a context for the DPD stage In line with the SE Plan it would be helpful for the Core Strategy to more clearly reflect the issue of viability. Otherwise it is considered the South East Plan creates a reasonably strong steer to safeguarding employment land, particularly in South Hampshire and Southampton (and in the context of seeking economic growth). Against this context it is considered the Core Strategy already promotes the appropriate degree of flexibility by setting criteria for assessing whether any sites can be released, including viability, regeneration potential, and recognising the need for housing provision. It does not state that all employment land will automatically be safeguarded. So whilst covering the Core Strategy's role to provide an overall direction, it does not pre-empt the more detailed employment land assessment of specific sites. It is agreed it would be helpful if the criteria more accurately reflected the SE Plan (and the Government's advice on Employment Land Reviews). However there should be no change in the overall approach.</p>	
GVA Grimley on behalf of Development Securities Plc	6	4.5.19	Should recognise that certain developments such as mixed use development may provide equal or increased employment through the more efficient use of land. The safeguarding of employment land should include a degree of flexibility to consider alternative approaches.	See general response (e.g. to Atis Real above). The Core Strategy already includes criteria with a degree of flexibility, recognising the potential of mixed use development in the last bullet point (para 4.5.19).	Slight amendment to text on mixed use to refer to retaining jobs or enhancing the quality of employment floorspace.
La Salle Investment Management on behalf of Coal Pensions Properties	4	4.5.19	Object. Our clients object to the Council's firm stance on the retention of employment land within the Core Strategy. Whilst the Employment Land Study (March 2006) identified a large need for employment land over the next 20 years this paragraph is premature and unduly restrictive until the functioning of specific sites is considered in more detail within the proposed Employment Land Assessment. The plan should allow flexibility so that employment sites which would be more beneficial in alternative uses can be released. Policy 4.5.19 should be deleted so as not to prejudice the findings of the forthcoming Employment Land Assessment which will provide background information for the "Site Allocations Development Plan Document".	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	10	4.5.19	Does not support the safeguarding of all existing employment land in the absence of a full employment land assessment and wish to reserve the right to make further representations on employment land issues in the future once this assessment has been undertaken. Decisions on the future use of land must be taken holistically balancing the different needs that may have been identified. The LDF should only identify priority employment sites that should be protected to meet identified needs.	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above
Scott Brownrigg on behalf of Kier Property	1	4.5.19	Objection - The proposed policy on safeguarding employment land is more restrictive than that included in the emerging RSS which advocates the review of all extant employment allocations which cannot be economically developed or which for other reasons are not suitable for employment purposes. I would like to see the LDF reflect the emerging RSS more accurately.	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above	See response to Atis Real (on Behalf of Ordnance Survey) Point 1 above
City of Southampton Society	6	4.5.20	Safeguarding employment land from 'drift' into other uses is vital.	Noted. Overall it is considered the Core Strategy provides a strong direction to safeguarding employment land.	No change required
ABP	4	4.5.23	If the City's vision is to be attained, then the Port needs much stronger policy support than is evidenced by the current document, which does not support its expansion. The Regional Economic Strategy (RES) supports the sustainable growth of the port as a key action and we are seeking to persuade the RSS EiP panel to advise the Secretary of State that the current draft RSS policy for the Port must be redrafted. If that is not done, then the City's vision would be seriously prejudiced at the outset. It is essential that LDDs are based on a Core Strategy that offers clear and unambiguous articulation of the overriding importance of the Port and supports its expansion. This support may be needed very shortly as the proposals mentioned in paragraph 4.5.23 could require the Port approach channel (partly within the City's boundary) to be deepened. It will certainly be a prerequisite of any future proposals for expansion.	The vision set out in the Core Strategy spatial objectives encompasses economic and environmental issues. There is, as always, a balance. The Proposed Submission Core Strategy now includes a policy to promote the port subject to these issues. The paragraph (and now the policy) says it will facilitate growth subject to environmental considerations, and is prefaced by a paragraph outlining the economic importance of the port. Support for the airport is qualified by the phrase "sustainable growth". It is agreed that the port is very important to the economy (of the city and UK). Some forms of expansion would also raise fundamental environmental issues of international importance. The Core Strategy cannot offer a blanket statement that the port is of "overriding" importance. In the context of the overall balance of policy, it is considered this section of the Core Strategy sets the appropriate positive support for the port, subject to a minor alteration in wording. Alternative Options: -Unqualified or fuller support for the port on the one hand, or further qualification on the other: none are considered to properly reflect overall balance of policy.	Include a specific policy and amend text to make more explicit that it is important to plan positively for the port provided there are no unacceptable environmental impacts.
City of Southampton Society	7	4.5.23	The port is a major driver in the local economy; improvement to the rail tunnel and improved freight access to Dock Gate 4 and 20 clearly a high priority.	Noted. Support welcome.	No change required.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
New Forest District Council	8	4.5.23	<p>Council welcomes the decision that no proposals have been made with regard to redeveloping port operational land. However the Council is concerned regarding the implications of the recent announcement by ABP that they are to increase capacity at Southampton Port by 40%.</p> <p>The proposals will have a number of consequences that we feel the Core Strategy Preferred Options fails to address; for example, the demand for storage facilities for both containers and cars and transport implications with regards to increased HGV movements across this District. The Council takes the view it would be more appropriate for freight traffic travelling from a westerly direction towards Southampton to use the A31/M27 and M271 to access the port.</p> <p>The Council would like to see more emphasis placed upon measures to mitigate against the impacts of increased capacity at Southampton Port. The City Council should support, through its policies, proposals to increase the efficiency of the use of existing port land to accommodate the port's storage needs.</p>	<p>An overall policy on the port is now included. Port developments within the port boundary are generally permitted development outside of this Council's control. However it is worth noting ABP will not be able to meet its growth targets without achieving significant efficiencies in the use of port land. The Core Strategy should also explicitly state non port related uses will not be permitted within the port area. Given its urban nature Southampton cannot realistically allocate new land for open storage. As the representor supports, the Core Strategy takes a strong approach to safeguarding existing employment land, and the storage needs of the port strengthen this argument: this should receive a reference. The Allocations DPD will determine what this land can be used for, and whether this can include B8 storage. For example, the existing local plan identifies roughly half of employment sites as suitable for B8. However using urban city sites for this purpose is not always the most sustainable response In terms of maximising jobs within the urban area to reduce travel – an appropriate balance needs to be struck. The Core Strategy already identifies measures to handle the growth in port activity: including rail freight and junction improvements. These improvements are considered capable of ensuring extra transport movements can be satisfactorily accommodated. The M271 route suggested is already identified as the preferred route in our Local Transport Plan and is clearly signed as such on the ground. About 75 – 80% of HGVs use this route, with most of the remainder using The Avenue.</p>	<p>Amend text to state non port related development will not be permitted within the port.</p> <p>Make reference to needs for open storage</p>

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
New Forest National Park Authority	3	4.5.23	<p>Objecting – This states that the City Council will help to facilitate growth at the Port and that this growth can be accommodated within the existing Port boundaries. Given the range of nature conservation designations close to the Port, the findings of the Appropriate Assessment and the importance of the Port to the local economy, the National Park Authority considers that a specific policy should be developed in the Core Strategy guiding development of the Port. This should take full account of the surrounding nature conservation designations, the need to mitigate potential impacts and the need to integrate the site with the rail freight network.</p> <p>Policy Omission: A specific policy should be included guiding development of the Port. This should take full account of the surrounding nature conservation designations, the need to mitigate potential impacts and the need to integrate the site with the rail freight network.</p>	<p>Generally any port related development within the operational boundaries of the port is permitted development under the 1995 order. However it is agreed that given the importance of the port, a specific policy to cover areas the Council can influence should be incorporated, including recognition of environmental issues. It would be helpful for the text to set out the permitted development right, and to specifically cover the additional issues raised by representor.</p>	<p>Include a policy to promote the growth of the port provided there are no unacceptable environmental impacts and there is a balanced approach with the need for city centre growth; and explain that within the city port growth will take place within the port's existing boundaries.</p> <p>Amend text: -refer to permitted development -Make broader reference to promoting rail freight (as well as the specific reference to the tunnel improvements) -make specific reference to surrounding environmental designations</p>
RSPB	9	4.5.23	<p>It is acknowledged that the operational requirements of Southampton Port may change and consequently proposals may be put forward to accommodate the operational requirements of the port. The RSPB welcomes the City Council's acknowledgment at paragraph 4.5.23 that "<i>subject to environmental and social considerations, the City Council will help to facilitate this growth</i>". The Core Strategy does not currently include a Preferred Policy Option that deals with the Port and Marine Industries. It is therefore recommended that if a Preferred Policy Option that deals with the Port and Marine Industries is progressed at the Submission Version, it should recognise the environmental constraints affecting the Port, including the relevant national and international nature conservation designations.</p>	<p>Port related development in the city is within the operational boundaries of the existing port and is generally permitted development under the 1995 order. However it is agreed to include a policy (see response to NFNPA above). Agreed the text should refer specifically to the environmental designations. The marine industries are covered by the approach to safeguarding existing sites / allocations in para 4.5.19 which already refers to environmental designations.</p>	<p>Amend text: -to include policy (see above) -refer to permitted development -make specific reference to surrounding environmental designations</p>

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	14	4.5.24	Add in reference to PPG20 requirements that development in a coastal location should only be allowed if it requires a coastal location.	PPG20 recognises this approach particularly relates to undeveloped coast. Southampton's coast is part of an urban area and subject to flooding / nature conservation designations development should be promoted. It would be unrealistic to require all urban waterfront development to be entirely coastal related. Para 4.5.19 already refers to retaining marine uses which require a waterside location.	No change required.
Highways Agency	3	4.5.25	For out of city centre development where alternative transport choices are more limited, emerging policies should minimise demand at source and we will require the mitigation of trunk road impacts throughout all stages of development planning, implementation and operation. Unless it is indicated that these locations are sustainable in transport terms, the HA is of the view that this policy does not fully align with PPS12 (paragraph 4.24) Test of Soundness 4 and 7.	This policy relates to the mix of employment on sites that come forward; it does not promote particular locations. In any case this policy is to be deleted in response to other representations. The Core Strategy applies a city centre first approach to office development in line with Government policy to support sustainable transport options. Out of centre industrial development is appropriate in terms of Government policy and in any case in Southampton these are usually within existing industrial areas. The Core Strategy seeks to safeguard existing employment land in the wider urban area of Southampton, which maintains jobs close to where people live and the city bus network, benefiting accessibility. Accessibility has been included as a criterion regarding the review of safeguarding sites. The Core Strategy's transport policies set out the need to promote accessibility by means other than the car, and to fund infrastructure for non car modes. Further assessment on the general core strategy's transport impacts has been undertaken.	No further changes required
Highways Agency	4	4.5.25	Where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan (with targets, monitoring, incentives for compliance and a funding stream) in order to fully align with PPS12 (paragraph 4.24) Tests of Soundness 4 and 7. The latest draft version of government guidance on travel planning is set out in recent Department for Transport publications (link attached).	Policies to minimise demand at source (e.g. green travel plans, etc) apply to a wide range of development, and is best addressed in the transport chapter. This has been amended to require assessments.	No change required
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	4	4.5.25	The mix of employment on new development and redevelopments needs to recognise the major role that retail and leisure employment plays in meeting employment objectives and need. The even distribution of employment throughout the urban area will help to meet sustainability objectives.	The box on overall terminology already acknowledges retail / leisure uses are major employers. Spreading such uses evenly around the city does not reflect Government policy to promote city and other centres.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Pressmile Ltd	9	PPO 11	The clarification in paragraph 4.5.26 that the policy will be applied in a flexible manner is recognition that the policy itself is flawed. The policy effectively seeks to place an unnecessary constraint on the market and the delivery of employment land. If such a policy is to be included, its wording should be amended so that it reads as an encouragement to providing a mix of employment, rather than being a policy requirement.	On reflection, the Council's Planning Policy and Economic Development teams agree that this policy was too restrictive and may hinder economic development. If there is a need for a particular type of economic development on a particular site at a particular time, this is best achieved by the public and private sector working in partnership. A number of start up business premises have been delivered around the city in this way.	Delete policy PO11 and associated text (which had sought a mix of employment development, including start up business premises.
Central Neighbourhoods Partnership and Health & Well Being Partnership	10	PPO 12	It is important to analyse the training needs required so that local people can be recruited and their skills developed; the people skills or fit for jobs skills. Suggest that employers consider apprenticeships/on the job training and that awareness of funding available for employees to take on apprenticeships is raised.	The Core Strategy's role is to establish the principle of seeking developer contributions to training. Further detail (where it can be influenced by the planning system) will be set out in supplementary planning document.	No change required.
Chamber of Commerce	5	PPO 12	Recognise need to increase vocational and skills training, largely led by the public purse but steered by employer interests.	Comment noted. The Core Strategy sets the principle that contributions can be sought from developers towards training to help tackle deprivation, etc. It is considered the strategy allows sufficient flexibility to help meet employment needs.	No change required.
Communities and Renewal Partnership	6	PPO 12	Welcome the specific mention of the need to use S 106 agreements to provide measures to promote access to the jobs it creates amongst those residents of the city who can have difficulty entering the labour market. The list of those having difficulty entering the labour market – needs to include people with poor health and exclude young people as a specific group – their difficulties are usually associated with the right qualifications which is already included.	Support welcome. Agree to suggested changes.	Amend text re access to jobs: -include people with poor health -exclude young people as a general group

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Drivers Jonas on behalf of SEEDA	12	PPO 12	Welcome the inclusion of thresholds above which this policy would apply but considers that some flexibility should be exercised in applying this. The City Council should only seek developer contributions in association with the specific development being proposed and should establish, consult and test a clear methodology and approach to achieve its objectives.	It is considered a flexible approach is advocated. The threshold simply indicates when the policy will apply, and leaves considerable flexibility as to how it will apply. The thresholds provide clarity and consistency so flexibility should not be introduced to this aspect of the policy: this would undermine the introduction of thresholds which the representor supports; and also risk the vagueness / lack of certainty to which the representation refers. The policy states that when the threshold applies, the particular approach to be taken should be tailored to the particular circumstances. This is where it is appropriate and important to be flexible. It is agreed that contributions should relate to the development, and so a cross reference to PO37 (and hence the Government circular) would be useful. The Government Circular on Planning Obligations (05/2005) explains (paras B25-B26) that the development plan document (in this case the Core Strategy) should set out general principles regarding planning obligations, e.g. – the matters to be covered and scale / form of contribution. More detailed policies on the application of these principles should be set out in a supplementary planning document. The Core Strategy covers the required scope as set out in the circular, and further detail should be provided in SPD.	Amend supporting text to cross refer to Core Strategy policy on developer contributions and Circular 05/2005.
Turley Associates on behalf of the Pressmile Ltd	10	PPO 12	It is considered that this policy is adequately covered by other Government legislation and is unnecessary. It should be deleted.	Government and SEEDA policy, together with the emerging South East Plan, promote in general terms economic competitiveness, skills, social inclusion and reducing the need to travel. The Council's Plan for Prosperity sets out similar objectives and targets. The draft Southampton Strategy (community strategy) sets a vision and objectives which promote learning and innovation, a dynamic business environment, and linking economic success and social justice. Promoting social inclusion in the city's priority areas (generally scoring high on the index of multiple deprivation) is a key priority for the Council. PPS 1 and 12 make it clear that the local development framework should help deliver these strategies. Circular 05/2005 on Planning Obligations states development plan documents should set out the planning obligations which will be sought. The Core Strategy should set out the principle of "access to jobs" developer agreements to ensure new development helps address the above objectives.	No change required.
Turley Associates	11	PPO –	The employment section fails to include a policy assessing the	Policies for individual employment sites will be set	No change required.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
on behalf of the Pressmile Ltd		Omission	merits of its existing employment sites and their potential for redevelopment for employment or other uses. This fails to accord with advice set out by the Government and represents a major shortcoming in the development strategy. The plan should take the opportunity to support a restructuring of the employment base, to make it more responsive to future needs and modern work practices and deliver wider benefits by releasing sites for mixed use or alternative uses e.g. at Willments Shipyard (summary of the proposed scheme provided).	out in the Allocations DPD. The Core Strategy sets out the appropriate framework for this to take place. References to mixed use, enhancing employment floorspace and PUSH targets for higher value economic growth are already included. The Willments site raises a number of fundamental issues which are likely to prevent the delivery of redevelopment / make it inappropriate – ecology, flood risk, transport, employment / marine industries, urban design considerations.	

Major / additional changes in Proposed Submission Core Strategy:

- **Policy change;**
 - **PPO 9 General approach to Employment – now CS 6 Economic Growth**
 - **PPO 10 Office Location – now CS 8**
 - **PPO 11 Employment Mix – deleted and incorporated into policy CS 6**
 - **PPO 12 Access to Jobs – now CS 24**
- **Policies and reasoned justification now split between chapter 4 ‘Spatial strategy and policies’ and chapter 5 ‘Key requirements for successful development**

Chapter 4.6 – Housing

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
New Forest District	2	4.6.1	This Council would like to reiterate its general support for the strategy with regard to the comments made at the issues and options consultation stage.	Welcome support	No change required.
GOSE	18	4.6.1	This states that site Allocations DPD will be produced following the Core Strategy, to show the detailed distribution of housing. Has consideration been given to the advice in PPS12 (paragraph 2.10) regarding core strategies which states that they should set out broad locations for delivering housing and other strategic development needs. What is your intended approach?	Further information will be added into the spatial strategy on the approximate quantum and type of new development appropriate in different parts of the city.	Include information on location and amount of new development required.
Natural England	14	4.6.2	It is difficult to fully assess the options without the confirmed recommendations of the South East England Plan and the Sub-Regional Strategy. We recognise the importance of high quality housing delivery and urban renaissance but would wish to ensure that policies for housing did not compromise those of the Natural Environment (4.4).	Comment noted.	No change required.
Communities and Renewal Partnership	7	4.6.3	Mention of improving the quality of housing and the increased requirement for affordable housing is welcomed.	Welcome support.	No change required.
Public Health, Southampton City Primary Care Trust	7	4.6.3	We are pleased that the key housing issues include affordability, mix, type and quality of houses and the commitment to the allocation of a site for gypsies and travellers.	Welcome support.	No change required.
The Planning Bureau Ltd on behalf of McCarthy and Stone	1	4.6.3	This misses out the issue of specialist elderly housing. The need for Sheltered Accommodation, or some form of specialised housing for the elderly, needs to be identified as an issue.	Sheltered accommodation need may be partially offset by "lifetime" homes provision. If required, allocated residential or 'windfall' sites will be available for provision. Exact need is difficult to predict.	No change required.
Public Health, Southampton City Primary Care Trust	8	4.6.4	We are pleased that the needs of an ageing population have been further explored in this section.	Welcome support	No change required.
City of Southampton Society	8	4.6.9	Older people should be mixed in with family communities rather than segregated by age.	The emphasis upon "lifetime" home provision, and no policies encouraging "downgrading" into small units, should encourage a higher mix with family communities and discourage segregation.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Wilky Property Holdings plc	1	4.6.9	<p>With the growing elderly population, there will be an ever growing demand for Care Homes for those who can not live in separate accommodation. This is not a Retirement Home but a home where care is needed constantly. Such uses must compete with residential values or employment designations, although they contribute significantly to employment opportunities. As such, they find it hard to locate sites, or need to pass the high costs on to the residents. If Southampton is to respond to its ageing population, whilst it is a fair proposition that the elderly should as a whole be accommodated in flexible housing for all ages, there will be a need for care homes as well.</p> <p>Suggested change - Whilst a policy promoting the provision of care accommodation would be useful, sites need to be identified and set aside in order to reduce the cost of such development and permit it to be fully inclusive and available to the public as well as the private sector.</p>	Care home requirement can be accommodated on allocated residential sites or "windfall" sites which are available. Exact need is difficult to predict; an allocated site could remain vacant for a long period. The Housing Strategy 2007-2011 includes reference to extra care housing, and retirement homes.	No change required.
The Planning Bureau Ltd on behalf of McCarthy and Stone	2	4.6.9	<p>Although there have been concerns over segregation, I feel that this would not occur. If this was the case, then why are companies that specialise in Sheltered Housing accommodation i.e. McCarthy and Stone so successful at it and why are some Councils even requesting developers to come in and develop these accommodation types. Segregation would occur no matter what, unless mixed developments take place but even these can result in levels of segregation. The benefits of Sheltered Housing developments need to be stressed before the drawbacks are raised they include; safety/security; companionship/socialising; no worries/less responsibility; well located/near amenities; house manager/warden; the availability of Careline and that the flat is easy to look after.</p> <p>Suggest the use of purpose built retirement apartments should be integrated into the Core Strategy not only as benefits to new residents, but also because of the benefits for Local Authorities.</p>	Core Strategy documents are not an appropriate source for "advertising" the benefits of sheltered housing. Retirement homes can be provided on allocated residential or 'windfall' sites. Demand is such that sites allocated for just sheltered or 'retired' housing could remain vacant which is a waste of resources. The Housing Strategy for Older People includes the provision of extra care housing, and independent living through the "lifetime" home.	No change required.
Environment Agency	15	4.6.12	Brownfield sites that may not be suitable for development in terms of flood risk, contamination and biodiversity impacts will need to be identified at a strategic level as part of the LDF.	A Strategic Flood Risk Assessment has been undertaken on a sub-regional basis, and will be incorporated in the relevant Core Strategy section dealing with flood risk issues, and the natural environment.	Incorporate the findings of the Strategic Flood Risk Assessment in the Proposed Submission document.
Bovis Homes	1	PPO 13	<p>Southampton's housing requirements will be determined by the RSS rather than PUSH. The figure of 16,300 should not be treated as a ceiling as it might increase and a more flexible approach should be adopted and/or reserve sites identified that could be brought into use should the need occur. The housing market is determined by buyers, sellers and economic circumstances rather than local authorities and is dominated by existing stock which the City Council cannot influence. The range, mix and price of dwellings are best left to housebuilders and purchasers.</p> <p>Suggest amending PPO13</p>	The 16,300 housing provision figure is in the South Hampshire section of the Regional South-East Plan as part of the 80,000 housing delivery for South Hampshire. It is backed up by DTZ research, and the Housing Needs and Housing Market Survey by David Couttie Associates. Reserve sites, generally greenfield, are not a part of urban Southampton's Capacity Study which advocates 100% brownfield site development for the city.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Central Neighbourhoods Partnership and Health & Well Being Partnership	6	PPO 13	Concerns about the amount of housing; need for less prescriptive government intervention and to protect open spaces	Open space within the city is protected, and does not form a part of the overall housing delivery. Allocated sites are 'brownfield'. Amount of housing to be provided is supported by Housing Needs and Market Research. Housing Provision policies must be in accordance with government planning policy guidance and statements.	No action required
Chamber of Commerce	7	PPO 13	Consideration should be given to expressing density in terms of bed spaces per hectare not dwellings.	The numbers of dwellings per hectare, and the number of bedrooms per dwelling required to meet housing needs, is the terminology used across South Hampshire, enabling comparisons to be made. However, future terminology may also include 'number of habitable rooms' in the development, in a more detailed document..	No action required.
West End Parish Council	5	PPO 13	It is all very well looking to the far distance but any plan needs to also be flexible, imaginative and innovative in the short term. Such flexibility seems to be lacking, e.g. how to cope with Government housing targets	Research undertaken locally, sub-regionally and regionally i.e. housing market studies; urban capacity studies; economic surveys cover short and medium term requirements and constantly update information, so that a degree of flexibility to meet requirements within the twenty year period can take place.	No change required
Eastleigh Borough Council	4	PPO 13	Object to the lack of clarity with regard to the broad location of new residential development which, on the scale envisaged, could have a significant impact on the transport corridors into the City and on a range of issues outside the City boundary	In accordance with PPS3, a broad indication of where residential development during the 5 year periods from 2006 until 2019 will be indicated in the Core Strategy. Delivery including windfall sites will be included between 2019 and 2026.	Include within the Core Strategy broad locations for future residential development and key sites.
GOSE	3	PPO 13	PPS12 (paragraph 2.10) states that the Core Strategy should set out the long term spatial vision for the authority's area and the strategic policies required to deliver that vision. It should set out broad locations for delivering the housing and other strategic development needs, such as employment, retail, leisure, community, essential public services and transport development. Have you considered if significant sources of housing provision have been distributed to broad locations? Also, have the implications for locations of this distribution been understood, leading to the inclusion of other uses and provisions needed to secure sustainable communities at the local level. It is suggested that the advice in PPS3 (paragraphs 53 to 57) are considered prior to the submission stage.	Broad locations for housing development will be included within the spatial strategy, updated to reflect sites identified within the SHLAA.	Include within the Core Strategy broad locations for future residential development and key sites.
GOSE	19	PPO 13	It would be expected that an element of flexibility is incorporated into the policy, in relation to a housing allocation of 16,300 dwellings between 2006 and 2026, in order to take account of changing circumstances. PPS12 (paragraph 4.24) states that a development plan document will be sound if it meets a series of tests, including (ix) that the plan is reasonably flexible to enable it to deal with changing circumstances.	Core Strategy is not so detailed and precise in relation to its housing allocations that it is inflexible. Housing needs and the market will be constantly updated over the 20 year period to enable change to occur if required – policies are sufficiently broad based to include a degree of flexibility within their framework.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
GVA Grimley on behalf of Development Securities Plc	7	PPO 13	Support the target of 16,300 dwellings between 2006-2026 but seek recognition that this is a target and that the aim of SCC will be to exceed the figure stated.	The SHLAA identifies sites with housing potential within the city and an allowance for windfalls towards the end of the period. It is considered that no more than 16,300 dwellings should be accommodated in the city up to 2026. Any more dwellings could have an adverse impact on the city's environment and the quality of life of the residents.	No change required.
Mrs Moyra Clearkin	2	PPO 13	I am concerned that the expansion of Southampton's population is already leading to marked traffic congestion across the city on the major trunk roads and the 'rat runs' that connect them. Query where people will work? A policy should be adopted consistent with the flourishing of Southampton's citizens and I do not feel that the Core Strategy is the answer.	Population growth will need to be accompanied by appropriate infrastructure. Economic growth will lead to more people working in city centre area with less traffic movement around the city, if more people live locally. However the sub-regional strategy for South Hampshire recognises that up to 2016 there will continue to be development outside the city in places such as Whiteley.	No change required.
SEERA	5	PPO 13	Policy H2 of the draft South East Plan advocates the production of Housing Delivery Action Plans for all Local Authorities within the South East. A commitment to producing a Housing Delivery Action Plan should be included in the Core Strategy.	The SHLAA includes the identification of sites and analysis of their potential including significant constraints and a broad assessment of viability.	No change required
Southampton Partnership	2	PPO 13	The Southampton Partnership expressed concern regarding the 16,300 new homes which is regarded as a SEERA/PUSH aspiration and the need to ensure that the City has adequate safe-guards in place regarding protecting our green spaces, more flats versus less family housing and the need to reverse this trend, and community cohesion and inclusion with regard to increasing number of homes and expanding population within the existing city boundary.	Green spaces are protected, housing will be on brownfield land; more family housing will be provided through revised policy CS16; mixed community cohesion issues appear in the Neighbourhoods Section.	Housing Mix and Type policy will include revised Family Housing figures.
Test Valley Borough Council	1	PPO 13	Request this is accompanied by supporting text explaining why there is a gap between the housing trajectory and the target of 16,300 dwellings and how this will be addressed.	Consider that the respondent may have got confused because the projected annual completions figured in the periods 2012-16, 2016-21 and 2021-26 are per annum figures not totals. This needs to be made clear in the table.	Amend text and appendix to ensure that the projected annual completions are clear.
Turley Associates on behalf of the Pressmile Ltd	12	PPO 13	Whilst it is acknowledged that the Core Strategy is based upon the PUSH submission (and in effect the Draft South East Plan), it is likely that this figure will change as a consequence of the remaining stages of the South East Plan preparation process. The strategy must be viewed in a flexible manner and an allowance made for a future increase in the baseline housing requirement and it must be substantially revised in order to reflect recent advice set out in PPS3. In view of the above, it is not relevant to set out a substantial comment on this policy as this will be more appropriate for a future point in time. However, at this stage we object to the housing figure as set out in the policy and consider that it needs to be revised substantially upward.	The current figure for housing delivery is properly researched by DTZ and David Couttie Associates on a local and sub-regional basis. The emphasis is upon high 'brownfield' delivery; "urban sprawl" is not supported locally or in the PUSH area, or South-East Plan. The South East Plan has not revised the 16,300 figure upwards.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Trustees of the Barker Mill Estate	4	PPO 13	Urban extensions are widely recognised as the next most sustainable form of growth after previously developed sites within urban areas. Consideration should be given to potential locations such as the Rownhams and Nursling area, disregarding the presence of administrative boundaries and taking a coordinated approach with Test Valley Borough Council focusing upon achieving sustainable objectives. (Plan attached to illustrate potential comprehensive development of c. 1,000 units). The City offers significantly greater potential than the 16,300 dwellings identified and a greater need taking into account the latest Government Household Projections, the backlog of unmet need for affordable housing and the implementation of the South East Plan Strategy with a growing economy being attractive for potential in-migrants. The figure suggested by Roger Tym and Partners of up to 1,533 dwellings per annum in Southampton UA (30,660 dwellings in total) would be more representative of both the likely need over the period to 2026 and the capacity of the City.	It is considered that no more than 16300 dwellings should be accommodated in the city up to 2026. Any more dwellings could have an adverse impact on the city's environment and the life of the residents. Housing needs and Market assessments do not support the approach advocated by the respondent. The Roger Tym assessment carried out for GOSE is a "desk top" study, which allocates large areas of green and open space and employment sites. Its proposals for Southampton were unrealistic and included development within the port and on the Sports Centre	No change required.
RPS on behalf of Fairview	2	PPO 14	Object to the requirement on sites of 10 or more dwellings to seek an affordable housing target of up to 40%. This could have a detrimental effect on the viability of development and may prohibit housing development in the area, if applied inflexibly without having regard to the merits of each case. Any specific requirement for affordable housing should be indicative and open to negotiation to accord with Government guidance in Circular 6/98 and paragraph 27 in the draft PPS3.	A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate.	Amend text with new thresholds and requirements and ensure flexibility is built in.
Drivers Jonas on behalf of SEEDA	5	4.6.13	Given the variety of settlement types, and differing needs in different areas of the region, a degree of flexibility should be maintained to account for individual applications and the differing characteristics of development sites coming forward.	A policy framework has been developed across the sub-region by PUSH, and incorporated in the South East Plan, to ensure that a consistent approach will be taken to deliver as much affordable housing as possible.	No change required.
New Forest District Council	3	4.6.13	The Council objects to the stance that 'it is intended that site thresholds and percentage target levels should be consistent across the region in future, if possible'. The Council believes that there are different circumstances across South Hampshire and subsequently would wish to retain the flexibility to develop policies for site thresholds which are appropriate to our local circumstances. Suggested change - it is intended that site thresholds and percentage target levels should be flexible across the region to meet the different needs that exist within the region.	A policy framework has been developed across the sub-region to ensure that a consistent approach will be taken to deliver as much affordable housing as possible. The specific requirements will vary between authorities.	Amend text with new thresholds and requirements and ensure flexibility is built in.
Housing and Neighbourhoods Scrutiny Panel	1	PPO 14	The panel supports the proposal for affordable housing policy, set out in the draft LDF, for a target level of 40% affordable units on new housing schemes on sites of 10 or more.	Welcome support. Please note that the affordable housing percentages and thresholds in this policy have been revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Swaythling Housing Society	1	PPO 14	Support changing the affordable housing requirement to 40% on sites of 10 or more. Many of the sites that become available in Southampton are small sites of less than 15 homes which make no contribution to the new supply of affordable homes. As small and medium sized sites generate only small numbers, it is necessary to increase the percentage at the same time.	Welcome support. Please note that the affordable housing percentages and thresholds in this policy have been revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate	No change required.
Chamber of Commerce	8	PPO 14	Achievement of balanced communities is welcomed. However affordable housing is not appropriate on every site and it may not be possible to deliver affordable housing where other community benefits are achieved. Rules must be applied with flexibility and understanding.	All sites capable of accommodating 5 or more dwellings will be eligible for affordable housing provision; in some instances the affordable units may be located elsewhere, or funded by the developer for future location. Community benefits may be more appropriate, or a viability assessment leads to non-provision. There will be a degree of flexibility.	No change required.
City of Southampton Society	9	PPO 14	Whilst the overall target figure of 40% is recognised some flexibility is needed to spread this policy over several sites.	Comment noted. Above response is relevant.	Amend text to ensure flexibility is built in.
Drivers Jonas on behalf of SEEDA	4	PPO 14	SEEDA understands the need for affordable housing and welcomes the requirement of 40% affordable housing at a maximum target for provision. SEEDA considers that this target should be flexible enough to take into account the merits of each application and the consideration of each individual site when deciding how much affordable housing a site should deliver. The viability of significant regeneration schemes and other development should not be compromised or prevented from coming forward as a result of this requirement.	It is accepted within the Core Strategy that the economic viability of a site to deliver a high level of affordable housing, particularly when small, may have to be tested, and prove to be unable to deliver for financial reasons. This will not lead to non development. Please note that the affordable housing percentages and thresholds in this policy have been revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate	No change required.
GOSE	20	PPO 14	It is suggested that the advice in PPS3 (paragraphs 27 to 29) on affordable housing is considered prior to the submission stage.	PPS3 (paragraphs 27-29) have been taken into account in addressing affordable housing needs, and the requirement for viability.	No change required.
GVA Grimley on behalf of Development Securities Plc	8	PPO 14	The 40% target should be justified and it should be recognised that this is a target figures that may not be suitable in all cases e.g. on constrained city centre sites. A flexible approach to affordable housing should be encouraged with regard to housing need, the prevailing social mix and tenure of an area and the potential for off-site affordable provision or payments in lieu, where demonstrated to be appropriate and where they give rise to wider benefits that would not be realised by on-site provision alone.	A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate.	Amend text with new thresholds and requirements and ensure flexibility is built in.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Linden Homes	4	PPO 14	This policy is objected to at present, in so far as there is no further proof since the Local Plan Inquiry for a lower threshold or higher percentage of affordable housing and the lack of impact this might have on development sites. Support the fact that an economic appraisal of the impact of this proposal on the housing market and housing delivery potential will be undertaken prior to adopting such a policy and trust this will be made public. Such adoption also requires the development of a scheme appraisal model (Residual Value and Value for Money Model) to test the viability assessment of potential housing sites; the threshold of affordable housing and the split between social rented and intermediate housing which is supported. If evidence is forthcoming that supports adoption of this preferred policy option, the need to link this to viability MUST be retained in any adopted policy.	A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate.	No change required.
SEERA	6	PPO 14	The Assembly welcomes the commitment to the provision of affordable housing in this policy. It is important, however, that a definition of affordable housing is included that reflects the definition in Policy H4 of the draft South East Plan including reference to the housing remaining affordable as set out in the supporting text.	The Affordable Housing Policy relates directly to South-East Plan Policy. The glossary will include a definition.	Add in glossary
The Planning Bureau Ltd on behalf of McCarthy and Stone	3	PPO 14	The thresholds for affordable housing set out do not meet with Government guidance on affordable housing. Draft PPS has not been officially adopted; therefore Circular 06/98 should be used as guidance and this indicates thresholds of 25 dwellings. The percentage of affordable housing sought from a development would seem to be adequate as long as there is flexibility to ensure that because of such a high percentage a development does not become unviable. There should also be flexibility in respect of provisions on and off-site so as to not jeopardise a development opportunity.	This statement is now out of date. Revised PPS3 paragraph 29 does permit the setting of lower minimum thresholds, where viable and practicable. A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate	No change required.
Turley Associates on behalf of Hammerson	3	PPO 14	Whilst Hammerson accept the principle behind the provision of affordable housing and acknowledges that the 40% figure has been derived from the Council's Housing Needs and Housing Markets Study, they are concerned that this figure is in excess of the 35% proposed by the Submission Draft South East Plan and could stifle residential development by rendering it unviable. PPO14 should be amended to accord with the regional target and make clear that it is a target and that individual circumstances should be taken into consideration when determining the level of provision, in particular mixed-use developments which may offer other 'community benefits' or extraordinary costs which have an effect on the viability of a scheme. It should also be made clear that, whilst first preference will be for on site provision, where this is not appropriate it can be provided off-site or the developer can pay a commuted sum. Suggested amending percentages from 40 to 35% (including 10% "intermediate" housing).	A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Pressmile Ltd	13	PPO 14	This policy needs to be amended to properly reflect recent advice set out in PPS3: Housing and the Affordable Housing Circular. The thresholds need to be properly justified in light of this advice and both the definition of affordable housing and the levels of provision sought need to be reviewed.	A viability assessment has been carried out on affordable housing percentages and thresholds and this policy revised to 35% on sites of 15 or dwellings and 20% on sites of 5 -14 dwellings. The policy will incorporate flexibility and negotiation as appropriate. The glossary will set out the definition of affordable housing.	No change required.
Turley Associates on behalf of the Trustees of the Barker Mill Estate	5	PPO 14	The issue of the thresholds for affordable housing and the level of requirement sought (in percentage terms) are likely to be dependent upon the progression of Government policy and as such, a debate on the approach at this stage is slightly redundant. However, regardless of the approach that is set out, it is essential that it makes an allowance for flexibility to take account of site specific circumstances and other costs of development.	There is a degree of flexibility in this revised policy through the potential viability assessment and the option for an alternative site or commuted sum payment where appropriate.	No change required
Savills on behalf of Wilky Property Holdings plc	2	PPO 15	With the growing elderly population, there will be an ever growing demand for Care Homes for those who can not live in separate accommodation. This is not a Retirement Home but a home where care is needed constantly. Such uses must compete with residential values or employment designations, although they contribute significantly to employment opportunities. As such, they find it hard to locate sites, or need to pass the high costs on to the residents. If Southampton is to respond to its ageing population, whilst it is a fair proposition that the elderly should as a whole be accommodated in flexible housing for all ages, there will be a need for care homes as well. Suggested change - Whilst a policy promoting the provision of care accommodation would be useful, sites need to be identified and set aside in order to reduce the cost of such development and permit it to be fully inclusive and available to the public as well as the private sector. Therefore PPO15 should also state that the Site Allocations DPD will identify suitable sites in the city for care homes.	The policy does not prejudice the provision of care homes for those requiring them, but seeks to retain a home for those who are ageing for as long as possible, through the provision of "lifetime" homes for the advantage of the elderly. The City's Housing Strategy, is seeking to provide Decent 'Lifetime' Homes for older people to maintain their independence. The allocation of residential sites for care homes only, could create vacant site, needed for other residential uses; although if local housing assessments emphasise that sites should be allocated, subsequent DPDs will reflect their findings. In the Proposed Submission Core Strategy this policy option will be amalgamated in the Housing Mix and Type Policy.	Amalgamate this policy with the Housing Mix and Type policy in the Proposed Submission Core Strategy.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Planning Bureau Ltd on behalf of McCarthy and Stone	4	PPO 15	<p>I am worried that the Council has not thought through this policy before dismissing Private Sheltered Housing.</p> <ol style="list-style-type: none"> 1. Elderly people have a tendency to want to remain in their homes for a long period of time, even when their children have left which results in unoccupied rooms, less housing being made available in the market and subsequently the need for larger family houses will increase. 2. The care for elderly people at home is a national problem, with low numbers of care workers, long hours and the cost of housing for these care workers, and these problems are only likely to get worse. Caring for the elderly in their homes should only be a temporary solution. 3. Security and safety for elderly people is extremely important, and is the most important reason they seek to move into Private Sheltered House. Living in their homes will not give them the assurance of their safety. 4. Socialising also becomes a problem when they are less mobile and cannot meet friends and other people. When living in Private Sheltered Housing, there are communal facilities to assist in making them feel welcome. 	<p>Private Sheltered Housing has not been dismissed. There is recognition that the elderly remaining in their family homes may create a reduction in family housing coming onto the market, but government policy is not encouraging elderly people to downgrade into small units. The city's Housing Strategy is looking to create "lifetime" homes to maintain the independence of the elderly. Entering private sheltered housing is up to the individual to decide upon when they feel unable to remain at home. Subsequent Housing Assessments, which will include elderly housing needs, will be reflected in future DPD policies.</p> <p>In the Proposed Submission Core Strategy this policy option will be amalgamated in the Housing Mix and Type Policy.</p>	Amalgamate this policy with the Housing Mix and Type policy in the Proposed Submission Core Strategy.
Chamber of Commerce	6	4.6.20	Useful to add in information on population trends here with reference to the recently announced closure of 4 Southampton schools.	School closure is only one issue likely to affect housing balance and need. Demographic issues are discussed within the Core Strategy. There will be a section of the Core Strategy that refers to education.	Update the text relating to the school review in Policy CS11 - An educated city.
Housing and Neighbourhoods Scrutiny Panel	2	PPO 16	The panel supports the Council's aspiration for a balanced housing market creating balanced communities particularly taking into account the need for family homes.	Welcome support	No change required.
Public Health, Southampton City Primary Care Trust	9	PPO 16	We welcome the commitment to providing family housing for Southampton.	Welcome support	No change required.
Turley Associates on behalf of the Pressmile Ltd	14	PPO 16	The provision of a range of housing types is essential to support the full needs of the community. In this respect the policy is supported, particularly in relation to the recognition of the need for family housing.	Welcome support	No change required.
Bovis Homes	3	PPO 16	Local authorities should not determine the range, price and mix of housing. The range and mix of housing is something that can be discussed by developers and local authorities, but it is individuals that decide where they want to live and how much they are prepared to pay. Such a policy is inappropriate and should be deleted.	Policy is based upon evidence gathering as defined by PPS3 (Paragraphs 10 and 11). Housing survey and research, locally, sub-regionally and regionally, provides the evidence and information about where the range of demand is likely to be, and the level of salaries which are available, which will dictate the market. The range and mix of housing delivery is a part of government requirement.	No change required.
Central Neighbourhoods Partnership and Health & Well Being Partnership	7	PPO 16	Concerns about the government definition of Brownfield sites. A mix of housing is required; too many flats are being built, more houses and bungalows with gardens needed and more family houses.	It is accepted in the Core Strategy that more family housing is required. In order to limit "urban sprawl" backed up by regional and sub-regional studies, less garden areas are more appropriate in urban areas. The Housing Mix policy will refer to 30% family homes on appropriate sites.	Include in the Housing Mix and Type policy reference to at least 30% family homes on appropriate sites.

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Communities and Renewal Partnership	8	PPO 16	Need to control the balance between family housing and smaller housing – communities generally are most successful where there is a balance of household size. Request consideration of the LNRS and some Action Plans which identify the need to consider using planning policy to: <ul style="list-style-type: none"> - avoid too great a concentration of social housing in Priority Neighbourhoods (LNRS p 21) - Reduce the impact of HMOs in certain areas (Bevois & Bargate, Portswood & St Denys, Freemantle & Polygon, Flower Roads, Hampton Park & Mansbridge). Also the need to take into account the specific needs of different communities.	The following issues will be addressed in the Core Strategy - affordable housing and family housing mix; HMO control, where Planning Permission is required, predominantly where family housing needs to be retained, and where shared housing is concentrated.	Include in the Housing Mix and Type policy reference to family housing. HMO control and affordable housing.
GOSE	21	PPO 16	It is suggested that the advice in PPS3 (paragraphs 20 to 24) on housing mix is considered prior to the submission stage.	PPS3 (paragraphs 20-24) have been taken into account relating to housing mix, and evidence to support the policy.	No change required.
GVA Grimley on behalf of Development Securities Plc	9	PPO 16	The policy should recognise to a greater degree that city centre sites suitable for high density, tall buildings and maximise the opportunity for residential development may not be appropriate for family housing with the need for gardens/greater amenity space.	The Core Strategy says that city centre sites are appropriate for high density development but in all locations usable outdoor space should be maximised.	No change required.
Mrs Jean Velecky	5	PPO 16	Query whether we need so many blocks of 1 and 2 bedroom flats and where their occupants will go when they want to marry and have children? Query about how many of the 16,300 homes (815 per year) have already been planned and how many are family homes?	The number of one and two bed flats needed is based upon housing needs, and housing market survey evidence. The Urban Capacity Study has illustrated locations for approximately 5,500 properties by 2011. The Core Strategy will also encourage at least 30% family homes on appropriate sites.	No change required.
Mrs Moyra Clearkin	3	PPO 16	Good quality housing that can accommodate families is being lost to the developers who are erecting blocks of flats suited to single people and couples, not families. Where will the next generation be raised and educated? In my view, houses with gardens are the most suitable environment to raise children yet these are being demolished across the city to make way for flats.	The imbalance between flat and housing delivery, has reflected the need for affordable housing. The Core Strategy policy will place greater emphasis upon the need for housing mix and more family homes.	No change required.
Southampton Partnership	1	PPO 16	The Southampton Partnership noted the 'Houses of Multiple Occupancy' initiative, launched by Gerry Gillen on North Neighbourhood Partnership, and 8 partners recorded their support for it.	HMOs requiring Planning Permission now form a part of the Core Strategy's housing mix policy.	Include reference to HMOs in the Housing Mix and Type policy.
Turley Associates on behalf of the Trustees of the Barker Mill Estate	6	PPO 16	Housing mix should be based upon the consideration of both the social needs of the area and the desires of the market. Clearly, given the nature of development sites in the Southampton area, there will continue to be a high proportion of development in the form of one or two bedroom flats / apartments. This is an area of supply that needs to be monitored to ensure that demand continues to exist and that the wider needs (for larger units) are also being satisfied. Peripheral development, in the form of urban extensions would be able to facilitate the delivery of family housing and assist in balancing the housing mix.	The need for affordable homes is being monitored through the Annual Monitoring Report, and Housing Need Surveys. The need for larger units is evidence based also. Urban Sprawl does not form part of the equation.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Bassett, Highfield & Swaythling Community Action Forum	2	4.6.21	It is important that planning and licensing work more closely together on HMOs issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO17.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
East Bassett Residents Association	2	4.6.21	It is important that planning and licensing work more closely together on HMO issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO17.	Amend Housing Mix Policy and Type to include references to HMOs requiring planning permission.
Flower Road Residents and Tenant Association	2	4.6.21	It is important that planning and licensing work more closely together on HMO issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO17.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Highfield Residents Association	2	4.6.21	It is important that planning and licensing work more closely together on HMO issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO 17	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Neighbourhoods Partnerships	1	4.6.21	I am concerned that your department may not fully realise the amount and strength of public feeling about HMOs (note that representations are from, and supported by, the members of the organisations not a handful of people). It is generally felt community representations have not adequately been taken into account or accurately reflected in the existing draft document.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO 17.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
North West Bassett Residents Association	2	4.6.21	It is important that planning and licensing work more closely together on HMO issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO 17.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Old Bassett Residents Association	2	4.6.21	It is important that planning and licensing work more closely together on HMO issues so we do not have separate departments working against the interests of each other and the community. The LDF must include proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds, plus providing adequate powers of enforcement. Other suggestions – the council putting pressure on our MPs to obtain changes to the Use Class Order; defining an HMO and requiring them to be subject to planning control.	Refer to previous responses on comments received on HMO issues on PPO16 and to comments below on PPO17.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
GVA Grimley on behalf of Development Securities Plc	10	PPO 17	Support the increase in housing density levels	Welcome support	No change required.
Network Rail	1	PPO 17	Network Rail supports the policy which encourages higher densities of housing development in the town centre and around public transport hubs. Brownfield land around stations would be suitable for residential/mixed development and the Council should consider opportunities for residential/mixed use activities in and around Southampton Central and Redbridge Station (development site at this station already advised in comments to Issues and Options stage) to encourage and assist in funding enhancements.	Welcome support	No change required.
New Forest District Council	4	PPO 17	The Council supports Preferred Policy option 17 and the strategy to accommodate more housing within the city. High densities can be accommodated more appropriately within the city context, whilst measures to safeguard the character of some suburban areas and open spaces are also justified.	Welcome support	No change required.
Bovis Homes	4	PPO 17	This is covered by Government guidance in PPS3 and there is no need for the City Council to impose its own requirements on certain sites.	PPS3 advises that local planning authorities may wish to set out a range of densities across their plan area.	No change required
GOSE	22	PPO 17	There does not appear to be a reference to a range of densities across the plan area (PPS3, paragraph 47). It is suggested that this advice is considered prior to the submission stage. Reference is made to “close to public transport”. It is suggested that this is clarified.	Figures relating to minimum density requirements: - city centre – district centres – suburbs – distance from public transport access will be included in policy text.	Include density ranges and public transport access in the Housing Density policy in the Proposed Submission document.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Neighbourhoods Partnerships	2	PPO 17	<p>This is steering the council in the wrong direction; it fails to adequately confront the HMO issue and maintains the status quo. Furthermore it appears contrary to existing policy H4 which states that HMOs should not be permitted 'where it would be against the character and amenity of the area'.</p> <p>The Council has undertaken to make application to Government for the licensing of all HMOs throughout the city within the next three months; local community groups are also making representations for an amendment to the Use Class Order. For this to be successful it is imperative for this matter to be adequately incorporated into the LDF and presented in a sufficiently clear and robust manner. Suggest a model similar to that of Northern Ireland.</p>	<p>Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO criterion is now included in the Housing Mix Policy for development which requires planning permission.</p>	<p>Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.</p>
Portswood Residents Gardens	1	PPO 17	<p>Wish to support comments of Jerry Gillen. The LDF Core Strategy document should seek to tighten regulations for the establishment of HMOS through the planning process to provide more local control. There is a strong feeling among local residents that the City Council needs more powers to try and restore communities, such as the Polygon, that have been blighted by transient populations in HMOs. Unless the LDF makes provision for dealing with HMOs, the Planning Panel will have little power to intervene and improve the situation in Southampton's communities.</p>	<p>Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO criterion is now included in the Housing Mix Policy for development which requires planning permission.</p>	<p>Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.</p>
Southern Water Services	7	PPO 17	<p>Object - Development densities need to have regard to the impact of development proposal on existing water, sewerage and wastewater treatment infrastructure. Re-development of sites with densities higher than those for which the infrastructure was originally designed can lead to overloading of the existing infrastructure and reduced levels of service to both new and existing customers.</p> <p>Future density requirements should have regard to the existing capacity of water and sewerage services, the mitigation required to provide adequate local capacity and the timing of its delivery. This may be dependant on the developer funding improvements to local infrastructure or Southern Water undertaking improvements to the strategic infrastructure.</p> <p><i>Add new text to last sentence:</i></p> <ul style="list-style-type: none"> <i>It will also take into account the need to protect and enhance the character of existing neighbourhoods, open space, infrastructure capacity and appropriate reduction and mitigation measures against flood risk</i> 	<p>Reference to mitigation measures, where appropriate, against flood risk will be added to the text. Environmental sustainability, including water related issues are referred to in the document.</p>	<p>Add reference relating to mitigation measures against flood risk in the Fundamentals of Design Policy and the Development density policy.</p>

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Turley Associates on behalf of the Pressmile Ltd	15	PPO 17	Density should be dealt with on a site by site basis taking account of the characteristics of the site and its surrounding area. This is recognised in the policy, but it is essential that the plan does not seek to identify areas where a particular density should be concentrated and artificially distort design solutions for specific sites. Adequate advice is set out at the national level to guide the density of development and this has recently been reinforced by the advice set out in PPS3: Housing. This should be the guide to density, rather than a specific policy in the plan or the Key Diagram.	Local Planning Policies need to reflect government planning policy statements, not take them as a means of avoiding local policy guidance. PPS3 states that local planning authorities should develop density policies, and lists the appropriate criteria, which the Core Strategy follows.	No change required.
Banister Park, Freemantle and Polygon Community Action Forum	1	4.6.22	This is a statement of the status quo – too expensive and under-occupied - rather than containing a policy to ameliorate it.	Refer to response relating to University / College involvement referred to in PPO 18 below.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission and to student accommodation.
Neighbourhoods Partnerships	3	4.6.22	This is steering the council in the wrong direction, in that it fails to adequately confront the HMO issue and if anything maintains the status quo. Furthermore it appears contrary to existing policy H4 which states that HMOs should not be permitted 'where it would be against the character and amenity of the area'.	Refer to response above on HMO issue in PPO 16, related to Housing Mix and Type.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission and to student accommodation.
The Environment Centre	16	4.6.22	Objection - There should be moves to address existing student accommodation proving too expensive and therefore under occupied before building new accommodation. In addition if well built accommodation is currently proving too expensive then presumably new (well built) premises may also face the same problem. Renovation should be considered as the best option rather than new build. Occupancy rates should be addressed before new buildings considered.	Refer to officer response on University / College involvement, on PPO 18 below.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission and to student accommodation.
Atis Real on behalf of Southampton Solent University (Flo Churchill)	1	PPO 18	This links the issue of affordability to the issue of provision. Whilst this link does exist it is no longer the Universities who provide student accommodation and the policy option must recognise this. The University will continue to have a role to encourage students to live in appropriate accommodation but can no longer, due to the current funding regime, afford to subsidise student accommodation. The Preferred Policy Option must refer to the role of current providers of student accommodation such as Unite who have a commercial role to play in the provision of student housing. The Core Strategy should not link the University to the control of the price of student accommodation	There is a need for a more integrated approach between Universities / Colleges; Local Authority; providers of purpose built student accommodation, to create better options for students than concentrated areas of Houses in Multiple Occupation. HMOs are causing pressure in certain areas of the city; purpose built student accommodation is providing insufficient alternatives.	Add reference in the text, relating to the Housing Mix and Type policy, to draw attention to the need for a more integrated approach between education / local authorities / developers of student accommodation.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Banister Park, Freemantle and Polygon Community Action Forum	2	PPO 18	We are unable to find any firm policy to realise the vision in this policy. Given the shortage, and loss of, family homes and the need for mixed sustainable communities, any further proposals for the conversion of buildings into shared houses should consider how they will harm the amenity of the area. Propose licensing of HMOs and linking licensing and planning to prevent areas from becoming overwhelmed by one unacceptable type of housing. Suggest comparing the policy for Southampton with that of other University towns such as Leeds, Nottingham, Belfast and Loughborough.	The Housing Background Paper refers to the increase in Licensing of HMOs to help monitor their location. The Housing Mix and Type policy will refer to the balance of housing, including family accommodation increase, and the wish to control HMO growth, where planning permission is required. Where areas have been set aside to restrict further HMO growth in policies in other parts of the country, they have been deleted when addressed nationally, and replaced with mixed housing objectives.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Bassett, Highfield & Swaythling Community Action Forum	1	PPO 18	HMOs remain an important issue to be resolved which will continue to blight the city and its inhabitants if not confronted and should be included in the LDF. Suggest amending the Core Strategy to include specific proposals to tackle concentrations of HMOs and to create areas of Housing Mix with viable thresholds. Non planning suggestions - preparing a brief for the creation of a strategy for the city (look at Leeds and Sheffield Local Plans), making immediate application to Government for additional licensing of HMOs and our MPs creating a Parliamentary HMO Lobby Group seeking to change the Use Class Order. Query whether we would like to be the City Council representation on the Action Group?	Refer to previous response on comments received by the Neighbourhoods Partnerships, and Community Action Forum sections.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Hazel Bingham	1	PPO 18	Planning, or the lack of it, and the levying of Council Tax, both seem to favour the acquisition of property by student landlords and the creation of squalor, and act against owner occupation and the upkeep and sightliness of the city. I believe that there is no task more important than the encouragement of owner occupiers back into our central residential areas, and the discouragement of HMOs. Student HMOs need to be limited and changes made in planning and licensing and with landlords paying Council Tax. Query who pays for services to student HMOs? Suggest requiring universities by law to provide a significant percentage of student accommodation in areas which would not impact adversely on local communities.	Unless the Use Classes Order is amended, and / or Universities are required by law to accommodate students throughout their education, authorities can only monitor HMOs through licensing, and seek more balanced housing provision within communities only where planning consent is required for an HMO. Other relevant issues are contained in the response to the Neighbourhoods Partnerships / Community Action Forum sections.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Friends, Families and Travellers	1	PPO 19	Travellers' accommodation needs have been ignored for many years in many places and the situation has grown worse over the past 12 years. However, in the context of national and local housing needs and projected development this is a very small issue indeed which should be easy to solve given the necessary goodwill and determination by local authorities to meet accommodation need (example of good practice and website with general guidance provided). The new framework on Gypsy and Traveller sites seeks to significantly increase the number of sites over 3-5 years with transitional arrangements also put in place where there is clear and immediate need. General concern about the lack of race equality impact assessments (REIA) in the planning process.	A Gypsy and Traveller Accommodation Assessment has been undertaken and the development, in principle, of a transit site within Southampton has been approved by the city council.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
GOSE	23	PPO 19	Is the intention to accord with the advice in Circular 1/2006 "Planning for Gypsy and Traveller Caravan Sites" (paragraphs 31 and 32)? The Core Strategy should set out criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand.	The Gypsy and Traveller Needs Survey is based upon Government Guidance – February 2006. Basic Criteria for the location of Gypsy and Traveller Sites is set out, to guide the allocation of sites in any future DPD.	Add criteria for the location of Gypsy and Traveller Sites in the Policy.
Test Valley Borough Council	4	PPO 19	Request that the role that adjoining authorities will play in the provision of Gypsy and Traveller sites is clarified.	The joint role of adjoining authorities in the provision of gypsy and traveller sites is clarified in the Hampshire and I.O.W. Accommodation Assessment, and briefly referred to in the Core Strategy.	No change required.
The Planning Bureau Ltd on behalf of McCarthy and Stone	5	4.6.26	By rejecting (c) the issues of low numbers of care workers, long hours and the cost of housing for themselves are not addressed.	The City's Housing Strategy for Older People seeks to provide extra care housing, and improvements to retirement housing: "lifetime" homes to enable independent living for as long as possible. Government Statement is committed to decent homes provision, rather than the downgrading of elderly people into small units, in preference to "lifetime" homes provision. This does not exclude the acceptance of the need for some smaller units and care homes to be provided.	No change required.
East Bassett Residents Association	1	PPO - Omission	Dismayed that, despite repeated requests at every Public Consultation meeting, a policy on HMOs has thus far been excluded. Suggest that we build on work already out elsewhere, for example in Northern Ireland.	Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO set of criteria is now included in the Housing Mix Policy for development which requires planning permission. The Local Plan Policy is also integrated into this policy. City Council is requesting the Secretary of State to amend the Town and Country Planning Act (Use Classes Order) to reduce the numbers of people jointly occupying houses without the need for planning permission, and change the general permitted development order to control group occupation of dwellings.	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Flower Road Residents and Tenant Association	1	PPO - Omission	Dismayed that, despite repeated requests at every Public Consultation meeting, a policy on HMOs has thus far been excluded. Suggest that we build on work already out elsewhere, for example in Northern Ireland.	Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO set of criteria is now included in the Housing Mix Policy for development which requires planning permission. City Council is requesting the Secretary of State to amend the Town and Country Planning Act (Use Classes Order) to reduce the numbers of people	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.

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				jointly occupying houses without the need for planning permission, and change the general permitted development order to control group occupation of dwellings.	
Highfield Residents Association	1	PPO - Omission	Dismayed that, despite repeated requests at every Public Consultation meeting, a policy on HMOs has thus far been excluded. Suggest that we build on work already out elsewhere, for example in Northern Ireland.	<p>Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO set of criteria is now included in the Housing Mix Policy for development which requires planning permission.</p> <p>City Council is requesting the Secretary of State to amend the Town and Country Planning Act (Use Classes Order) to reduce the numbers of people jointly occupying houses without the need for planning permission, and change the general permitted development order to control group occupation of dwellings.</p>	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
North West Bassett Residents Association	1	PPO - Omission	Dismayed that, despite repeated requests at every Public Consultation meeting, a policy on HMOs has thus far been excluded. Suggest that we build on work already out elsewhere, for example in Northern Ireland.	<p>Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO set of criteria is now included in the Housing Mix Policy for development which requires planning permission.</p> <p>City Council is requesting the Secretary of State to amend the Town and Country Planning Act (Use Classes Order) to reduce the numbers of people jointly occupying houses without the need for planning permission, and change the general permitted development order to control group occupation of dwellings.</p>	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.
Old Bassett Residents Association	1	PPO - Omission	Dismayed that, despite repeated requests at every Public Consultation meeting, a policy on HMOs has thus far been excluded. Suggest that we build on work already out elsewhere, for example in Northern Ireland.	<p>Unless the Use Classes Order is amended nationally, the Northern Ireland approach, whereby planning consent is needed for more than two qualifying persons who are not all members of the same family, cannot be implemented. An HMO set of criteria is now included in the Housing Mix Policy for development which requires planning permission.</p> <p>City Council is requesting the Secretary of State to amend the Town and Country Planning Act (Use Classes Order) to reduce the numbers of people jointly occupying houses without the need for planning permission, and change the general permitted development order to control group occupation of dwellings.</p>	Amend Housing Mix and Type Policy to include references to HMOs requiring planning permission.

Major / additional changes in Proposed Submission Core Strategy:

- **Policy change;**
 - **PPO 13 Housing delivery – now CS 4**
 - **PPO 14 Affordable housing delivery – now CS 15 Affordable housing**
 - **PPO 15 Housing Provision for Older People – incorporated into CS 16 Housing mix and type**
 - **PPO 16 Housing Mix and Type – now CS 16**
 - **PPO 17 Housing density – combined with PPO 2, now CS 5**
 - **PPO 18 Student Accommodation – incorporated into CS 18**
 - **PPO 19 Gypsy and Traveller Accommodation – now CS 17 Gypsy and Traveller accommodation and accommodation for travelling showpeople**
- **Policies and reasoned justification now split between chapter 4 ‘Spatial strategy and policies’ and chapter 5 ‘Key requirements for successful development**

Chapter 4.7 – Transport

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Alex Templeton	6	4.7.2	The city appears committed to growing the airport. There are an estimated 10,000 people already affected by the noise from the flight path and airport expansion will increase the numbers affected. I'd like to see a commitment from the council to reduce the number of flights and lobby for quieter jets and other measures to make life more bearable for those under the flight path.	The City Council's position on the sustainable growth of Southampton Airport has been made clear via previous Cabinet Decisions (notably decision 21 st November 2005). This calls for business growth and not tourism growth. Aviation policy is predominantly set by National Government.	No change required.
GOSE	24	4.7.2	With regard to Southampton Airport, (public safety zone falls within Southampton's boundary), have you consulted with the CAA on the proposals for the City, in terms of the advice set out in the Circulars 1/2002 and 1/2003?	As outlined in the LDF Adopted Statement of Community Involvement the CAA have been consulted as a general consultee. Issues of public safety and aerodrome safeguarding are specific DC policies and should be covered by other DPDs. The Local Plan Policy on the issue will be saved. However reference should be made to the public safety zone in the Spatial Strategy section with regard to how it impacts on the spatial strategy. Public safety zone is mentioned under 4.1 key principles directing development.	Include reference to the public safety zone in the Spatial Strategy.
Natural England	15	4.7.3	We would expect any changes to the current transport systems or roads that would arise as a consequence of the development to be in keeping with SCC's sustainable objectives. We commend conformity with the LTP2 and Solent Transport Strategy, especially in its aims; it is our opinion that preferred policy options 20 and 22 achieve this. We will comment on Option 23 and water taxis (4.7.17) through the SEA/SA and Habitat Regulations assessment.	Welcome support. Regard for the SEA/SA and AA will be had and mitigation measures adopted for the final Core Strategy wording.	No change required.
Central Neighbourhoods Partnership and Health & Well Being Partnership	1	4.7.4	Transport infrastructure is not meeting the needs of older/disabled people. Need to improve the bus services and infrastructure e.g. affordability, frequency, service / routes in outlying areas and Ocean Village, bus stops, timetables, to provide waiting rooms. Need for better integration of transport, better timetabling and through ticketing. Need for better facilities for cyclists and pedestrians and to consider priorities and safety	Ensure that issues of inaccessibility are referenced and also that sustainable and Active Travel modes are promoted. Further guidance is available in the LTP2.	No change required
City of Southampton Society	10	4.7.5	Query what alternative transport services are proposed?	The future transport system for Southampton will be based on rail, bus, Active Travel, ferry, taxi, and car. The presumption being to maintain sustainable development objectives, the 'alternative' is to prevent continued 'car only' growth.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Highways Agency	5	4.7.5	Where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan (with targets, monitoring, incentives for compliance and a funding stream). The latest draft version of government guidance on travel planning is set out in recent Department for Transport publications (link provided).	Agreed. Transport Assessments should be prepared for larger developments (major applications) as specified in the Appendix on Parking standards in the Preferred Options. Travel plans should be required for larger developments. The specifics of this are too detailed for a Core Strategy but will be included in relevant DPD / SPD.	Include references to travel plans in the document and refer to Transport Assessments in policy CS19 Transport Reduce-Manage-Invest. Amended with references throughout the document.
Eastleigh Borough Council	9	4.7.7	It is requested that any references to the SDA refer to it as 'north/north east of Hedge End'.	Agreed.	Amend reference to the SDA in Eastleigh Borough to 'north/north east of Hedge End'.
New Forest National Park Authority	4	4.7.7	Objecting – The Hythe Ferry from the waterside parishes of the New Forest has a role in reducing car traffic on the congested A326 and the western roads into the City. It contributes towards the multi-modal transport system for the sub-region. Suggest that this should be amended to support the role of the Hythe Ferry as part of the City's spatial transport strategy.	Agreed. The Hythe Ferry is important and will be referenced. However it is beyond the control of the Core Strategy.	No change required.
City of Southampton Society	12	4.7.8	It has been pointed out that the suburban stations are under utilised. To alleviate vehicle pressure in the City Centre more use could be made of car parking at selected suburban stations, including some outside the city but within the South Hampshire area as for many the car will be the vehicle of choice to get to the station.	Parking at railway stations will be permitted in accordance with the standards providing that it serves new development along with interchange facilities. Other public transport links and importantly pedestrian links to stations should also be enhanced.	No change required.
Central Neighbourhoods Partnership and Health & Well Being Partnership	2	4.7.10	Other ideas proposed of using shop-mobility schemes in district centres as part of an integrated system, ways to use parks at night - tuk tuks suggested, the introduction of Monorail, trams / street cars and of a Park and Ride system.	Ideas noted. The general approaches of the Core Strategy must be deliverable. Monorail and tram is expensive, however, proposals for Park & Ride will be included.	No change required.
Highways Agency	6	4.7.10	Where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan (with targets, monitoring, incentives for compliance and a funding stream). Link provided to the latest draft version of government guidance on travel planning.	Agreed. Transport Assessments should be prepared for larger developments (major applications) as specified in the Appendix on Parking standards in the Preferred Options. Travel plans should be required for larger developments. The specifics of this are too detailed for a Core Strategy but will be included in relevant DPD / SPD.	Include references to travel plans in the document and refer to Transport Assessments in policy CS19 Transport Reduce-Manage-Invest. Amended with references throughout the document.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Highways Agency	9	4.7.10	In accordance with PPG13, Park and Ride sites should be located where they can intercept existing traffic and not where they would generate additional trips. A transport impact assessment would also be required for such sites and we would also expect to see a reduction in town centre parking. The HA is concerned about the location of the Park and Ride site close to the M27 Junction 5, and we would wish to discuss this further before further development of this and other DPDs.	Agreed. The three sites would intercept traffic following from the west, north and east along the M27 / M3 corridors. The northern site would be located either south of junction 5 or north as part of the Airport Parkway Station. The junction already deals with traffic for the Airport and the City and as such a site could 'capture' this and transfer traffic onto more sustainable bus routes thus enhancing air quality in the City.	No change required.
Ingrid Pettengell-Roese	2	4.7.10	Buses could be driven with fuel cells (as in Hamburg). Cycle path should be incorporated into pavements; however the roads and pavements are not wide enough for cycling.	These are predominantly issues for the LTP 2 and general highways maintenance- too specific for a Core Strategy. Buses are deregulated; as such there are limited powers available to force companies to use fuel cells.	No change required.
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	5	4.7.10	The spatial approach should identify the benefits of creating mixed use communities in reducing travel needs.	This issue is considered relevant for the overall spatial strategy and key strategy objectives. The aims of the transport section are to deliver an enhanced urban quality of the city and more sustainable transport.	No change required.
New Forest District Council	6	4.7.10	The Council fully acknowledges the prospect of park and ride schemes as a method of traffic management, particularly as a response to city centre congestion. It is acknowledged that the park and ride site on the western side of Southampton is to be located in Test Valley Borough Council. However this Council would like to be made aware of any proposals for park and ride schemes which may have an impact upon the District at the earliest possible stage.	Agree. As a key consultee the Council will be informed of any planning application following the adoption of the LDF Core Strategy.	No change required.
Public Health, Southampton City Primary Care Trust	10	4.7.10	We welcome the specific mention of Active Travel in the first paragraph and under 4.7.10. But under preferred options 20, 21, 22 and 23, there is no mention of Active Travel and the focus is on the port, infrastructure, and other transport development. It would be helpful if the commitment to Active Travel could be reflected in these preferred policy options as well.	Noted. Active travel modes such as cycling and pedestrian walkways will be included to reflect the spatial aims of the LTP2. PPO 20 and 23 will be combined in the Proposed Submission Core Strategy and PPO21 will be deleted (see response in relation to comments on PPO21 below).	Include reference to Active Travel in policy CS19 Transport Reduce- Manage- Invest. Amended with references throughout the document.
Savills on behalf of MDL Developments Ltd	2	4.7.10	Objection - Waterside access needs to be balanced with marine employment and businesses as well as the natural environment as noted in Preferred Policy Option 33 Suggest - the words "and marine sector" need to be added after the natural environment on the last line of the second bullet point	Agree. The Core Strategy should be read as a whole. The final policy will continue to show the balance required between access, the natural environment and the economic interests along the waterfront. Wording noted.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	17	4.7.10	<p>Objection - Walking, Cycling and Mobility Buggies Cycle paths should be included in transport planning. A measurable improvement should be noted such as, "Southampton will have 100km of additional cycle paths by 2026".</p> <p>While generally supporting the use of Park and Ride schemes to reduce traffic and pollution, more research needs to be undertaken before these schemes should be realised as they may not prove to be the best environmental option. Sites need to be carefully identified and consulted upon before any plans can be properly commented upon and should be alongside other deterrents to minimise car use and positive action to increase public transport.</p>	<p>The target is noted. The Proposed Submission Core Strategy will need to include deliverable policies that can be monitored. The LTP2 annual monitoring will deal with this.</p> <p>Significant research has already been undertaken into Park & Ride. The implementation of these sites is important in enhancing overall air quality in the city and enhancing access around the city.</p>	No change required.
Test Valley Borough Council	6	4.7.10	Welcome the support given to the Park and Ride facility on the M271 at the boundary with Test Valley.	Welcome support	No change required
V Roberts	3	4.7.10	Shared corridors provide no protection for pedestrians and cyclists from vehicle emissions/particulates which are a health hazard and deter walking and cycling. For safety, cyclists should be separated from pedestrians. Homezones, no additional parking space on council estates and congestion charging are all sensible solutions.	Useful points. Shared corridors are a necessity in many cases given the built up nature of the city. Air quality will be enhanced in line with AQMA and the overall spatial strategy. This will not just be down to planning but also enhanced technology. Detailed highways design is not a matter for the Core Strategy that will set the overall presumption for a higher quality streetscene. Congestion Charging is a matter for full Council separate from planning.	No change required
Communities and Renewal Partnership	9	PPO 20	<p>Pleased that issues of inaccessibility by public transport will be addressed – this was identified in Mansbridge and Townhill Park Action Plans.</p> <p>Concerned at the blanket approach to "Ensure that green spaces and vegetation are not lost to extra off-street car parking to maintain the overall Streetscene and quality of place." Some of the Priority Neighbourhoods have narrow roads and the car parking creates a specific danger by blocking access to emergency vehicles. There may be places where on balance the use of a verge for parking improves the streetscene and improves safety.</p>	<p>Agree. Issues of inaccessibility will continue to be addressed via the Proposed Submission document.</p> <p>The Proposed Submission strategy will set out the fundamental spatial approach to a more attractive, design-led streetscene that places people first. In that regard parking concerns although valid, should be integrated within a framework that considers open space and design. Flexibility will be added that ensures that the streetscene remains the priority. The site allocation DPD will look further into specific sites. The Green space Strategy will look into the use of open spaces, such as verges.</p>	No change required.
Drivers Jonas on behalf of SEEDA	16	PPO 20	SEEDA asks for flexibility in the approach to car parking in order to secure the benefits of more jobs brought by redevelopment and regeneration.	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. Flexibility will be provided in the Proposed Submission policy within the constraints' of maximum standards, PTAL and government guidance. A solely economic based approach to 'jobs' would have negative consequences on other sustainability factors. Further work is still to be done on car parking standards, and will included in other DPDs.	Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria. Parking standards have been amended to reflect this.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	16	PPO 20	Suggest addition to bullet point three – ‘a strategic network of cycle ways and pedestrian walkways will be developed to encourage active transport’. Design could provide for the creation of wildlife corridors so that they are attractive places to use.	Noted. Active travel modes such as cycling and pedestrian walkways will be included to reflect the spatial aims of the LTP2. Wildlife corridors’ form part of principles for a high quality streetscene and also the green grid natural environment issues. Developments will be encouraged that reduce the need to travel.	No change required.
GOSE	25	PPO 20	Preferred policy 20 refers to maintaining a parking provision. Have you considered this approach in the context of PPG13?	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. Flexibility will be provided in the Proposed Submission policy within the constraints’ of maximum standards, PTAL and government guidance.	Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria. Parking standards have been amended to reflect this.
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	6	PPO 20	Policy Option 20 should recognise that the introduction of services and facilities which serve local needs within existing communities will reduce travel needs, a policy aim which is both economically viable and environmentally and socially sound.	The overall spatial strategy and neighbourhoods’ elements of the Proposed Submission version will set out the requirements to achieve sustainable developments that include a need to maintain and grow local services to reduce travel demand.	No change required.
Keith Nutburn	1	PPO 20	Southampton has fallen behind Portsmouth in many areas and has just focused on building apartments/housing. The amount of increased traffic this has brought to the city and will continue to do so leads me to wonder why a transportation system such as a mono-rail or tramlines (similar to Nottingham) is not mentioned in the future development of the city. There are many key areas of Southampton that could be easily connected by a transportation system that would make getting round the city so quick and convenient and set it apart from its South coast rivals.	The recent LDF Annual Monitoring Report 2005/06 demonstrates that although a larger proportion of new development has been residential, the city has also accommodated a broad range of growth including office, retail and hotels. The Core Strategy will set a framework for this to continue. The future growth of the city will be made more sustainable via enhancements to rail, bus and active travel. Recent growth since 1996 has not led to an increase in road traffic (in broad terms) due to measures such as constrained car parking, travel plans etc. The LTP monitoring report confirms this. Tram systems are excellent modes for achieving a more sustainable transport system, however, these are expensive and recent Government decisions have shown that to pursue a network for the city would be a risk that presently the City Council is not prepared to take. The LTP 2 does not include proposals for tram.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Mike Pimblott	1	PPO 20	Rather than city council trying to reduce vehicles entering the city centre, a more balanced approach should be considered. If the public could see a benefit of public transport when using city centre facilities then a reduction in the use of private vehicles could well follow. Suggest linking of the train station to the input route for the centre, making the centre of Southampton motor vehicle free. Specific proposals include a number of car parks on its perimeter connecting to the centre via solar energy powered “buses” and covered walkways to shops and facilities. Similar delivery parks could take away the delivery traffic and there could be an underground delivery system developed utilizing solar powered trucks.	The LTP 2 includes measures to enhance public transport. Unfortunately the present deregulated bus regime is beyond the scope of the planning system. The spatial strategy, via place making and streetscene initiatives will seek to reduce access for the private car further, making the City Centre more pedestrian and active travel focused (with provision for bus). The role for utilising solar technology is attractive, but a matter for the private bus companies.	No change required.
Mrs A. D Crimble	2	PPO 20	Suggestion that specific bus routes be reinstated to enable people to get into Bitterne	The issues are a matter for the LTP 2 and deregulated bus companies. Connections between Bitterne and the City Centre are key spatial principles that will be supported by the Proposed Submission strategy.	No change required.
Network Rail	2	PPO 20	Network Rail supports the second bullet point of the policy as it encourages the movement of freight by rail to/from the Port of Southampton. Activities at the port are likely to increase throughout the planning period and there will be a need to increase rail capacity to move more freight. Issues such as loading gauge and freight path capacity are being examined by the industry.	Welcome support	No change required
Public Health, Southampton City Primary Care Trust	11	PPO 20	We welcome the specific mention of Active Travel in the first paragraph and under 4.7.10. But under preferred options 20, 21, 22 and 23, there is no mention of Active Travel and the focus is on the port, infrastructure, and other transport development. It would be helpful if the commitment to Active Travel could be reflected in these preferred policy options as well.	See response to PCT’s comment 10 above.	Include reference to Active Travel in policy CS19 Transport Reduce- Manage- Invest. Amended with references throughout the document.
R C Blandford	2	PPO 20	The one issue that is of most concern is the inadequate and expensive public transport service within the city – surely if more regular services were available on all routes at reasonable fares, more people could be tempted to use the system therefore reducing congestion and pollution.	The LTP 2 includes measures to enhance public transport. Unfortunately the present deregulated bus regime is beyond the scope of the planning system.	No change required.
RSPB	10	PPO 20	Supporting - this provides a robust framework for working towards modal shift away from the private car. The objective that “green spaces and vegetation are not lost to extra off-street car parking”, is particularly welcomed.	Welcome support	No change required
The Environment Centre	9	PPO 20	Supporting - It is vital to ensure that car parking provision is restrained to help reduce reliance on the car and create a modal shift. Targets should be set regarding the amount of parking provision alongside targets for users of public transport, cycle and possible Park & Ride.	Welcome support – targets are a matter for the LTP 2 monitoring that will feed into the LDF.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	18	4.7.11	Objection - There should be better public transport links to the Cruise terminals.	Agree. The overall strategy seeks to support the LTP 2 on transport matters to achieve a more sustainable network.	No change required
Bovis Homes	5	PPO 21	This proposal appears to comprise a local development tax and is being suggested at a time when Government is considering a Planning Gain Supplement. In these circumstances, the City Council should simply adhere to Government advice in Circular 05/05. Whilst every developer seeks to operate in an efficient manner, it must be his duty to decide on the source and the price of the materials he uses; this is entirely beyond the remit of a local authority, it is inappropriate and should be deleted.	The advice in Circular 05/05 was adhered to in preparing this policy. However this proposal for transport funding will now be incorporated into the infrastructure contributions policy. Further details will be set out clearly in a future SPD.	Incorporate PPO21 in a policy on developers' contributions. Reference made under Delivery Framework and Monitoring section,
Environment Agency	17	PPO 21	Support enhancements to strategic habitats (Appropriate Assessment may necessitate this approach). This could lead to large scale habitat creation which would be ideal for river restoration in the city in both fresh and saline stretches.	Please see the approaches taken to strategic habitats in the Natural Environment section and overall infrastructure contributions.	Incorporate PPO21 in a policy on developers' contributions. Under CS22 and Delivery Framework and Monitoring section,
GVA Grimley on behalf of Development Securities Plc	11	PPO 21	We seek confirmation that the pooled contributions will be set at a fair and reasonable scale and kind to the proposed development and accord to Circular 05/05.	The advice in Circular 05/05 was adhered to in preparing this policy. However this proposal for transport funding will now be incorporated into the infrastructure contributions policy. Further details will be set out clearly in a future SPD.	Incorporate PPO21 in a policy on developers' contributions. Delivery Framework and Monitoring section, an throughout the document,
Highways Agency	11	PPO 21	Minimum thresholds triggering the requirement of developer contributions should be removed as in certain cases even small developments may have an undesirable impact on the trunk road network. In accordance with DTLR Circular 04/2001 each application should be determined on its own merits and any contribution should be based on the impact of the development traffic on the trunk road network rather than just size and type of development.	The thresholds are included in order to provide developer certainty and clarity for all. The advice in Circular 05/05 was adhered to in preparing this policy. However this proposal for transport funding will now be incorporated into the infrastructure contributions policy. Further details will be set out clearly in a future SPD.	Incorporate PPO21 in a policy on developers' contributions.
Public Health, Southampton City Primary Care Trust	12	PPO 21	We welcome the specific mention of Active Travel in the first paragraph and under 4.7.10. But under preferred options 20, 21, 22 and 23, there is no mention of Active Travel and the focus is on the port, infrastructure, and other transport development. It would be helpful if the commitment to Active Travel could be reflected in these preferred policy options as well.	See response to PCT's comment 10 above	Incorporate PPO21 in a policy on developers' contributions.
RPS on behalf of Fairview	3	PPO 21	Object to the requirement that developments of over 5 dwellings will be required to contribute to transport infrastructure funding. Any policy coming forward should have full regard to the guidance set out in Circular 5/05, in particular in tests in paragraph B5 and it should relate to the site. Any policy proposed should clearly state that wider impacts will only be sought where it can be demonstrated that this is reasonable, necessary and related to the scale of the development.	The thresholds are included in order to provide developer certainty and clarity for all. The advice in Circular 05/05 was adhered to in preparing this policy. However this proposal for transport funding will now be incorporated into the infrastructure contributions policy. Further details will be set out clearly in a future SPD.	Incorporate PPO21 in a policy on developers' contributions.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Chamber of Commerce	9	PPO 22	If parking standards are to be relaxed, an interim situation needs to be taken by the Council to ensure new development is not put on hold or goes to out of town sites.	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. Flexibility will be provided in the Proposed Submission policy within the constraints' of maximum standards, PTAL and government guidance. The Local Plan Review parking policies will remain in force until the Adoption of the Core Strategy in summer 2009.	Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria.
Highways Agency	12	PPO 22	Would support the reduction of car parking provision as part of a wider transport management strategy which provides sustainable travel alternatives.	Welcome support	Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria. Parking standards have been amended to reflect this.
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	1	PPO 22	Support - Striking a balance between restraining provision whilst taking a balanced approach to city centre developments is essential to achieving a practical city centre development strategy. An appropriate level of well managed parking can offer advantages to the city centre as a whole, ensuring well located developments operate satisfactorily without highway safety issues.	Welcome support	Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria. Parking standards have been amended to reflect this.
Public Health, Southampton City Primary Care Trust	13	PPO 22	We welcome the specific mention of Active Travel in the first paragraph and under 4.7.10. But under preferred options 20, 21, 22 and 23, there is no mention of Active Travel and the focus is on the port, infrastructure, and other transport development. It would be helpful if the commitment to Active Travel could be reflected in these preferred policy options as well.	See response to PCT's comment 10 above.	Include reference to Active Travel in policy CS19 Transport Reduce- Manage- Invest. Amended with references throughout the document.
RSPB	11	PPO 22	Supporting - as a mechanism for reducing the use of private vehicles and for working towards Sustainable Development.	Welcome support	No change required.
Savills on behalf of Linden Homes	1	PPO 22	Support the more flexible approach to maximum parking standards. The standards are more flexible and viability and delivery can be assessed through liaison with the city council under a central government guided policy background.	Welcome support	No change required.
City of Southampton Society	11	4.7.14	The desire to reduce the use of the private motor car is appreciated, however car ownership is seen as a desirable objective by the majority of people and this is not likely to change significantly over the next few years. For many people, the availability of small fuel efficient cars will outweigh alternative means of transport, although economic measures (higher fuel costs, taxation) will play a part. It is suggested that the present guidelines for parking space in both residential and office areas are too restrictive.	The role of good planning and transport planning should be to change attitudes and behaviour overtime via a more sustainable built environment along with attractive alternatives to the car. Car parking will consider the national and regional guidance and as such will reflect levels of car ownership.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Linden Homes	3	4.7.14	Support the more flexible approach to maximum parking standards and welcome the change of emphasis on residential standards. The standards are more flexible and viability and delivery can be assessed through liaison with the city council under a central government guided policy background.	Welcome support	No change required
Eastleigh Borough Council	7	4.7.16 Transport Preferred Options Diagram	It is requested that the Park and Ride designation be moved westwards, as its current location could be interpreted as being linked to Southampton International Airport	Noted. The spatial diagram is just that, a general expression and not geographically specific. The Proposals Map will be updated to reflect the site specific allocation in due course. However, the notation for the park & ride site on the Key Diagram for the Proposed Submission Document will be amended.	Amend the location for the park and ride site, to the north of the city, on the Key Diagram Key diagram now reflects this.
GVA Grimley on behalf of Development Securities Plc	12	4.7.16 Transport Preferred Options Diagram	We seek clarity about the Pedestrian Non-Car Core and assurance that this area seeks to reduce the use of the private car rather than to exclude cars from the central area (diagram on p50). Enforcing car free developments may compromise the deliverability of many development proposals.	Clarity will be provided in the Proposed Submission Document. The Central area will be characterised by 'pedestrian priority measures' via streetscene / place making enhancements. There are significant sustainability and air quality arguments to restrict access by the private motorcar to Central areas.	Make pedestrian/cyclist measure clearer. References to car free developments have been removed.
New Forest District Council	5	4.7.16 Transport Preferred Options Diagram	On page 50 a key gateway and strategic freight corridor is identified in the 'Transport Preferred Options Diagram' running towards Totton on the A35. New Forest District Council takes the view that the A35 is an inappropriate road for use as a strategic freight corridor as it is likely to result in a significant increase in HGV movement through settlements within the District including Totton and Lyndhurst. The Council believes it would be more appropriate for freight traffic travelling from a westerly direction to Southampton to use the A31/M27 and M271 to access the port, particularly in light of proposals to nearly double its capacity. Suggest that the diagram should be amended so that the A35 is no longer identified as both a key gateway and a strategic freight corridor. In addition the Council acknowledges that the ferry service to Hythe is now shown on the Transport Preferred Options Diagram on page 50.	Comments noted. The Hythe ferry was shown on both the Key Diagram and the Transport Preferred Options Diagram. The final Key Diagram should show the M271/M27/A31 as the key corridors. The Transport Preferred Options Diagram will not be included in the Proposed Submission version of the Core Strategy.	Amend the Key Diagram to show more clearly the M271/M27/A31 as the key corridors. Key diagram only shows the M27 and M271.
Turley Associates on behalf of the Pressmile Ltd	16	4.7.16 Transport Preferred Options Diagram	We support the identification of the Itchen Bridge area as a key gateway into the City and the Woolston area as a 'Major Node'.	Welcome support	No change required.
City of Southampton Society	13	4.7.17	Re-establishing passenger services on the Totton-Hythe and Fawley line would probably make a greater contribution to reducing car travel from Waterside than enhanced ferry services however attractive they might seem.	Comments noted. Network Rail and the rail operators are ultimately responsible for any expansion in rail services. Solent transport will continue to lobby for enhancements and argue for new routes were appropriate. Presently a passenger extension on the Fawley line is not considered viable.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Public Health, Southampton City Primary Care Trust	15	4.7.17	We welcome the commitment to developing a system of water taxis.	Although not the direct responsibility of the City Council, the Spatial Strategy alongside wider transport strategies will continue to promote, via new development, a system of more sustainable transport modes, these may include water taxis.	No change required.
Savills on behalf of MDL Developments Ltd	3	4.7.17	Objection – Query what evidence is there that water taxis in Southampton can work and provide a realistic alternative for trips around the city except for leisure use and will be a viable reason to seek developer contributions. These should not be diverted away from alternative measures where there will be realisable outputs. Suggest the word 'should' in paragraph 4.7.17 final bullet point needs to at least be changed and this issue reviewed as and when it is clear that there is a possibility of implementing a viable service.	Points noted. Water taxis may only realistically come forward from specific proposals and be of a temporary nature. If more realistic proposals are argued against sustainability criteria then these should rightly be pursued.	No change required.
Chamber of Commerce	10	PPO 23	Query about implication of statement that Southampton is a regional hub in transport management terms, for example, whether the Romsey/Southampton rail link could be extended to the Waterside utilising all the small stations en route with park and ride at each station. The proposed road toll on Bursledon Road should not apply to cars with high occupancy. Welcome recognition that the expanding Port will need effective rail and road access.	Southampton is a regional hub as given by the emerging South East Plan due to the Station, Port and Airport. The spatial strategy will seek to enhance these as part of an overall sustainable transport approach. This will only happen in partnership with key bodies such as BAA and Network Rail. The BAT lane is set out in the LTP 2- when implementing to 2026 high occupancy users may well be deemed exempt.	No change required.
West End Parish Council	2	PPO 23	The plan is very weak on transport infrastructure and the ways in which commuters from the surrounding area will travel to work in the city, for example, gridlock on the M27. The Romsey to Totton rail link is a start but much more could be done to create rail park and ride from M27 and rapid transit, cf the Newcastle-upon-Tyne Metro. Particularly needed are improved links with neighbouring areas of population, e.g. Eastleigh.	The LTP2 is the statutory transport plan; the Core Strategy gives its spatial implications. The strategy must seek to support and deliver the overall regional strategy for transport given by the South East Plan. In that regard it will include policies to deliver the planning or geographical implications for sustainable travel. Park & ride proposals are included. Rail expansion or trams are considered unviable due to costs and Government policy.	No change required.
Eastleigh Borough Council	5	PPO 23	Object to the lack of a reference in the transport policies to the need to secure appropriate links between the City and the SDA north/north-east of Hedge End via the A3024 Bursledon Road and the Windhover park and ride site to junction 8 of the M.27 and not via Thornhill and junction 7 of the M.27 (and seeks amendments to the key diagram and other plans accordingly).	Noted. The Proposed Submission strategy and key diagram will include references to the SDA and links with other major growth areas. Park & Ride could also potentially service the SDA, although it is expected that alterations in key bus routes linking the City Centre-Cricket Ground-Hedge End will be the most viable. The issue is of sub regional importance.	Include reference to the SDA in policy CS19 Transport Reduce-Manage-Invest. Under CS18.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	11	PPO 23	There is little reference to the implications of the Port activity and expansion on the environment. In maintaining and improving port facilities, any encroachment into tidal rivers and estuaries must take into account the effects on protected habitat, water quality and public access to the water.	Port growth is beyond the control of planning due to permitted development rights, however, the transport implications are. The strategy must ensure that growth is placed on rail and that the role of transshipment is supported so as to reduce lorry movements. Shipping movements and implications of land reclamation by the Port are beyond the scope of the Core Strategy, being national issues. As the Port is such an important activity in Southampton, further details and a policy on the Port will be added.	Add in further details on transport and the Port. Include a separate policy on the Port. Port is mentioned as part of city wide transport measures and CS9
Highways Agency	7	PPO 23	Where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan (with targets, monitoring, incentives for compliance and a funding stream). The latest draft version of government guidance on travel planning is set out in recent Department for Transport publications.	Agreed. Transport Assessments should be prepared for larger developments (major applications) as specified in the Appendix on Parking standards in the Preferred Options. Travel plans should be required for larger developments. The specifics of this are too detailed for a Core Strategy but will be included in relevant DPD / SPD.	Add in requirement for transport assessments for significant development in policy CS19 Transport Reduce-Manage-Invest.
Highways Agency	13	PPO 23	Request some details about how Southampton City Council wishes to enhance the strategic road network's Gateways and approaches. Whilst the HA supports the concept of regional coach facilities in principle, it would need to consider any impact on the trunk road network. In accordance with PPG13, coach facilities should be located where they can intercept existing traffic, and not where they would generate additional trips.	Expansion in regional coach travel is supported by the emerging South East Plan. In order to achieve modal shift from motoring to alternative modes coach, bus and rail will play an important role. The Gateways and approaches will be included in the Proposed Submission document and will refer to the visual aesthetics of the city as much as the role as important strategic link's.	No change required.
Hound Parish Council	1	PPO 23	Concern raised that the Portsmouth Road is highlighted as a key gateway to Southampton and that the Bursledon Road (A3024) is considered to be a strategic freight corridor to the docks and support for SCC. Suggest that the M27 / M271 should be the first preferred route for freight traffic into Southampton. Suggest that consideration is given to the impact the reduction of car parking in Southampton will have on existing Park and Ride facilities which could have a detrimental impact on the Parish of Hound.	Agree. The preferred route for freight is the A33/M271 corridor as given by the LTP 2. The City also needs to provide alternative routes for freight traffic and these are set by the LTP 2 as being The Avenue, Thomas Lewis Way and Bursledon Road. Park & Ride will be implemented over the plan period; this will be delivered via growth, a reduction in long stay City Centre parking and expanded Park & Ride at three key locations.	No change required.
John Kinghorn	2	PPO 23	With a more attractive location for the station, significantly improved local rail services would be able to make a much greater contribution to 'a superior alternative transport system'. I would like to see a strategy of redevelopment and relocation of Central Station, together with a policy of improvement to local rail services (many are currently hourly, too infrequent to be valuable).	The redevelopment of Central Station will be a key factor of the Proposed Submission Core Strategy. Moving the Station is considered impractical and costly. Discussions with Network Rail as a key partner will be crucial in delivering a major redevelopment.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Maggie & Richard Jacob	1	PPO 23	Restored old Southampton trams could run from West Quay, along the walls, across to Mayflower Park / Town Quay to Ocean Village.	Tram systems are excellent modes for achieving a more sustainable transport system, however, these are expensive and recent Government decisions have shown that to pursue a network for the City would be a risk that presently the City Council is not prepared to take. The LTP 2 does not include proposals for a tram.	No change required.
Network Rail	3	PPO 23	<p>Supports - first part of bullet point three. Southampton Central Station has considerable potential for redevelopment opportunities for mixed use/residential development retaining and supplementing the existing facilities. Network Rail is expected to maximise the commercial value of its estate, through redevelopment or enhancement of the existing portfolio where ever possible, in order to provide significant enhancements to the existing transport infrastructure.</p> <p>Objection - presumption against station parking. It is suggested that the policy be amended by making provision for long term railway station parking for rail users. People are more likely to use the national rail network, instead of completing their whole journey by car, if they are able to leave their cars at the station, in a safe, secure environment, and continue their remaining journeys by train. The Council needs to recognise that commuting is now an important part of people's lives and that adequate parking is essential for commuters who live in areas that are not well served by public transport or use the station at hours when there is little or no bus service.</p>	<p>Welcome support for redevelopment of the Central Station. The redevelopment of Central Station will be a key factor of the Proposed Submission Core Strategy. Discussions with Network Rail as a key partner will be crucial in delivering a major redevelopment, the commitment is welcome.</p> <p>New parking at the station should be line with redevelopment as given by the LTP2. Extra parking without such would lead to a poor use of land and increase car trips in line with rail use, a situation that is unsustainable.</p>	No change required.
New Forest National Park Authority	2	PPO 23	<p>Objecting - This policy supports continued growth at the Port and the Airport which will increase carbon emissions immediately adjacent to sensitive environments (including the River Itchen SAC, the Solent and Southampton Water SPA/Ramsar and the Solent Maritime SAC). The potential negative impacts on these designations are highlighted in the Appropriate Assessment and mitigation measures should be included.</p> <p>Request clarification of the inclusion of text supporting the growth of the airport which lies outside of the Southampton City boundary and therefore any planning applications would be determined by Eastleigh Borough Council.</p> <p>The policy wording regarding development at Southampton Airport and the Port of Southampton should include mitigation measures along the lines of those set out in table 8.4 of the Appropriate Assessment.</p>	<p>The Airport is beyond the direct control of Southampton City Council being within Eastleigh Borough. However the implications of the airport affect the City, including noise and air quality as well as economic considerations, as such it is relevant for a spatial strategy that looks beyond boundaries.</p> <p>Port growth is beyond the control of planning due to permitted development rights, however, the transport implications are. The strategy must ensure that growth is placed on rail and that the role of transshipment is supported so as to reduce lorry movements. Shipping movements and implications of land reclamation by the Port are beyond the scope of the Core Strategy, being national issues. As the Port is such an important activity in Southampton, further details and a policy on the Port will be added.</p>	Add in further details on transport and the Port. Include a separate policy on the Port. Port is mentioned as part of city wide transport measures and CS9

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Public Health, Southampton City Primary Care Trust	14	PPO 23	We welcome the specific mention of Active Travel in the first paragraph and under 4.7.10. But under preferred options 20, 21, 22 and 23, there is no mention of Active Travel and the focus is on the port, infrastructure, and other transport development. It would be helpful if the commitment to Active Travel could be reflected in these preferred policy options as well.	See response to PCT's comment 10 above.	Include reference to Active Travel in policy CS19 Transport Reduce- Manage- Invest.
Savills on behalf of MDL Developments Ltd	6	PPO 23	The proposed toll road on the A3024 should not and need not be mentioned specifically here as it can be implemented in line with the final bullet point on Preferred Policy Option 23. As set out this could unduly restrict the east of the city and this needs to be examined in more detail Suggest - Delete explicit reference to the A3024	The BAT lane is mentioned in the LTP 2. The BAT lane will only be implemented alongside Park & Ride. However, we recognise that this idea will need to be further developed and therefore will delete reference.	Include references to Park & Ride in the policy on car and cycle parking and delete reference to the BAT lane from the policy setting out strategic transport spatial approaches. BAT has been deleted.
The Environment Centre	10	PPO 23	Objection – There should be limits in place or a statement of what the City Council considers 'sustainable' growth of Southampton International Airport and these should then be consulted upon. Supporting - welcome the introduction of road user charging, a high occupancy lane and car park tariffs so long as a fair system is introduced and public transport infrastructure including cycle paths is improved to enable the change.	The City Council's position on the sustainable growth of Southampton Airport has been made clear via previous Cabinet Decisions (notably decision 21 st November 2005). This calls for business growth and not tourism growth. The BAT lane is mentioned in the LTP 2. The BAT lane will only be implemented alongside Park & Ride and the overall strategy for sustainable transport. However, we recognise that this idea will need to be further developed and therefore will delete reference.	Include references to Park & Ride in the policy on car and cycle parking and delete reference to the BAT lane from the policy setting out strategic transport spatial approaches. BAT has been deleted.
Test Valley Borough Council	7	PPO 23	Welcome the commitment to working with the adjoining authorities to encourage non car based travel on the busiest roads	Welcome support	No change required.
V Roberts	4	PPO 23	Tolls on A3024 could shift traffic onto less suitable A334 Bitterne Road East/Thornhill Park Road.	The BAT lane is mentioned in the LTP 2. The BAT lane will only be implemented alongside Park & Ride. The implementation will be based on specific transport studies. The A334 to the north leads onto the proposed BAT toll road anyhow whilst the A3025 to the South leads to a tolled Itchen Bridge. Therefore the incentives to use these as alternative routes will not be high. However, we recognise that this idea will need to be further developed and therefore will delete reference.	Include references to Park & Ride in the policy on car and cycle parking and delete reference to the BAT lane from the policy setting out strategic transport spatial approaches. . BAT has been deleted.

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 20 Overall citywide transport spatial approaches – now combined with PPO 23 within CS 18 Transport; reduce – manage - invest**

- **PPO 21 Transport Infrastructure Funding – deleted**
- **PPO 22 Car and cycle parking – now CS 19**
- **PPO 23 Overall strategic transport spatial approaches – incorporated into CS 18**
- **Policies and reasoned justification in chapter 5 ‘Key requirements for successful development**

Chapter 5.1 – Spatial Framework: Overview

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Turley Associates on behalf of the Pressmile Ltd	17	5.1.1	The document identifies the four key 'geographical areas' and this is generally supported. The overview should give greater regard to the links between areas and the potential that each has to influence the other, in particular the waterfront area and its links with the city centre. The potential of the waterfront area is substantial and its growth is directly related to the functioning of the city centre. This linkage should be recognised and there should be specific reference to the improvement of links from one area to another.	The strategy recognises that the key areas overlap and are interlinked. The Proposed Submission version structures the policies differently. However there is still a specific policy and justification on the waterfront. This recognises the links between the waterfront and the city centre and the potential of this area. Other policies and sections in the strategy provide a framework for the redevelopment and how to address specific issues such as delivering high quality housing, flooding and international environmental designations.	Document restructured

Major / additional changes in Proposed Submission Core Strategy:

- Chapter deleted and the key geographical areas now identified in section 4.3 including more details on the quantum of development

Chapter 5.2 – City Centre

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	18	5.2.2	Waterfront should not only cover Southampton Water but include the rivers Itchen and Test.	Agree. No suggestion otherwise in the city centre chapter	No change required.
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	2	5.2.2	All references to increases in retail floorspace (such as in paragraph 5.2.2) should be prefixed by the words “at least” on the basis that the DTZ sub-regional study appears to underestimate retail needs for Southampton as noted by the authors and in the Council’s own City Centre Retailing Background Paper (October 2006). Paragraph 5.2.2 should acknowledge that in some circumstances (such as those described by paragraph 2.6 of PPS6) extensions to existing primary shopping areas maybe appropriate where a need for a large development has been identified and cannot be accommodated within the centre. As such the wording on paragraph 5.2.2 should state “Retail floorspace will be focussed either in the primary shopping area or in an extension to this area if and when appropriate”.	The Core Strategy states that projections of need should be subject to ongoing monitoring in the light of the latest data. It is recognised that some factors might increase needs, but there are also other factors which could reduce needs. Stating the needs are a minimum would partially prejudice that on going monitoring. The Core Strategy’s phrase “approximately” is more appropriate. The background paper “city centre retailing” takes account of redirecting needs from out-of-centre locations in reviewing the figures for need. The suggested rewording of para. 5.2.2 is considered a less accurate reflection of PPS6 policy overall. Nevertheless the specific issue raised regarding large scale development is acknowledged, and minor text changes are recommended.	Amend para 5.2.2 (part): “...Retail floorspace will be focussed first in the existing primary shopping area (PSA) <u>where possible</u> , and then in an extension to this area when appropriate”. Add to para 5.2.21 to recognise that the existing PSA may not be able to accommodate large scale retail operators.
Natural England	16	5.2.2	Support the aims in 5.2.2, however we will comment further in response to the SEA/SA and Habitat Regulations assessment.	Welcome support and look forward to continued dialogue	No change required.
Nick Le Lean	2	5.2.2	We need to think big with some amazing glass buildings, ocean centre jutting out into the sea, public access to our waterfront not just more yuppie flats and private yacht clubs. We need to use the location and people to create a ‘buzz’ and attract business and create prosperity for all.	Welcome enthusiasm of citizens for their home city. The Core Strategy’s role is to set out the overall approach. The aims set out at para 5.2.2, set out many of the representors aspirations, e.g.: links to active waterfront / passing ships, positive design, a mix of different uses. In line with the representors comments, and the emerging community and / or regional strategy, it would be useful to add the international / world wide profile aspirations; and economic growth / prosperity objectives. Ideas for specific sites (e.g. Royal Pier, etc) are being addressed through the City Centre Action Plan	Amend supporting text to refer to promoting Southampton’s international profile; and (in the spatial vision) the role the city centre will play in promoting economic prosperity.
Peter Clay	2	5.2.2	I run a business in Below Bar; the main issues are practical problems of: the run down appearance of the street; problems from drunken people here late at night; number of traffic lights in the City Centre; increase in rates payable with no improvement in any council services. The Core Strategy should be to tackle fundamental practical problems and only when this has happened then look at your grandiose schemes.	Regarding poor pavements / late night anti social behaviour: the Core Strategy sets the context for seeking developer contributions to improving the street scene and community safety measures (e.g. paras 5.2.2 and text to PO37 (implementation chapter). (Controlling anti social behaviour also needs an input of others outside the planning system). Control of traffic light phasing and Council tax levels are not planning matters within the remit of the Core Strategy. We will welcome further dialogue with local businesses to see how the City Centre Action Plan can help address these issues.	No change required.
Public Health,	16	5.2.2	We welcome the commitment to improving access to the city centre	Agree with respondent’s comments.	Amend order so test

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Southampton City Primary Care Trust			by public transport, cycling and walking – could these be reversed to stress active transport? (Walking, cycling and public transport.)		reads: walking, cycling and public transport.
The Environment Centre	20	5.2.2	Objection – whilst the document talks about linking to access points such as the railway station, there is little information in regard to how the transport systems (road and rail) will be developed to cope with the increase in persons visiting the expanded city centre. Details should be set out clearly and consulted on before any expansion for retail use.	To promote sustainable travel, commercial and retail development is being focussed on the city centre to capitalise on the public transport hub and the large “walk in” catchment. For the same reason, the strategy is to deal with extra trips by encouraging a switch to walking, cycling and public transport first; utilising spare capacity in the public transport network; enhancing public transport infrastructure (e.g. Central Station); and only then consider improvements to road travel, which could include junction improvements. The Background paper on transport is likely to set out the likely number of trips and potential for modal shift. The Core Strategy’s role is to set out the overall approach. More detail on specific schemes is identified through the local transport plan, and will be identified through the City Centre Action Plan, and through the assessment of particular proposals, with opportunities for consultation. The aim of promoting non car transport modes is set out in the aims of the chapter. In the light of this representation, it would be useful to expand this aim as stated in the recommendation column.	Add to aim as follows: Promote access to and around the city centre, with priority given to walking, cycling, public transport <u>and travel plans</u> .
Theatres Trust	1	5.2.2	Core Strategy should have regard for the Cultural Strategy. The Core Strategy Preferred Options document to be unsound because it is not consistent and has not had proper regard to Southampton’s Cultural Strategy. Need to include mention of the proposed Northern Above Bar cultural quarter.	The Core Strategy city centre aims at para 5.2.2 includes the principle of promoting cultural development in the city centre. The Northern Above Bar cultural quarter is an important and positive scheme which relates to a specific site, so will be addressed through the City Centre Action Plan. PPS12 states that core strategies should identify broad locations for development (in this case, the city centre).	No change required.
Public Health, Southampton City Primary Care Trust	17	5.2.3	We strongly support enhanced connections to the water front.	Welcome support	No change required.
Central Local Housing Office	1	5.2.4	Change boundary of City Centre to include St Marys Street. There is a need to link shops in to the main area – this is a deprived ward. The Bevois and Bargate Action Plan should be used and focus given to this area. This would not be a huge change but would open the area up and focus more thinking and spending etc in this area.	Agreed. The possibility of including St Mary’s within the city centre was a consultation question at the issues and options stage of the City Centre Action Plan. Most responses on the question favour its inclusion. It is considered the other issues raised are addressed by the wording in the Core Strategy regarding appropriate assessments, and the potential to define a major commercial quarter in the City Centre Action Plan. PPS6 Annex A describes city centres as regional centres: “The centre may be very large, embracing a wide range of activities”.	Amend the City Centre boundary to include St Mary’s.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
				St Mary's is a mixed area including this wide range of activities, rather than predominately a central residential area. It includes Southampton football stadium, City College, and the St Mary's / Northam shopping streets, which have elements of specialist retail provision; as well as residential / small business elements, and potential redevelopment sites. Its inclusion retains consistency with the south eastern part of the existing city centre, of a similar mixed nature. As a relatively deprived mixed area, it is recognised that its inclusion in the city centre will aid linkages to benefit regeneration.	
Savills on behalf of Dorepark Limited	1	5.2.4 City Centre Preferred Options Diagram	The city centre should include St Marys and up to the River Itchen through to Northam Bridge given the link to leisure aspects such as the Football Stadium and potential synergies available, whilst the ABP land should all be included within the Central Area if any is, as this does not impact on their operational port issues, but should land be freed up within the port, its location is clearly within the city centre. Suggested changes - The city centre ideally should be bounded by the water to the south and east, including all ABP land and all St Mary's up to the east and River Itchen, including the Stadium.	Regarding St Mary's: Agreed. See response to Central Local Housing Office above. Regarding ABP land: Agreed. This option was consulted upon at the City Centre Action Plan issues and options stage. A number of respondees supported the option. Of those who raised issues, it is considered these are addressed by the wording in the Core Strategy regarding safeguarding for port use, and regarding appropriate assessment. Whilst this is operational port land and is safeguarded as such; inclusion in the city centre will facilitate key links: for example, city cruise liner terminals creating a distinctive waterfront destination linked to the city centre; and the possibility that the dock gate 4 area could facilitate a relocation of the vehicle ferry terminals and so enable the Royal Pier redevelopment. The Dock Gate 4 area also includes the Oceanography centre, a key city centre office / R&D employer. The operational requirements of the docks will be a key determinant of whether these ideas can be delivered. Inclusion with the city centre boundary will facilitate these ideas in the future if they are brought forward.	Amend the City Centre to include St Mary's and parts of the docks (City Cruise Terminal and Dock Gate 4)
Environment Agency	21	5.2.7	Main issues are the risk to many of the built up areas of flooding from tidal waters in the rivers Test and Itchen and their vulnerability to future effects of climate change and in particular sea level rise. A Strategic Flood Risk Assessment should assess this prior to site allocation. Future waterfront regeneration should follow PPS25, table D.1. This steers new development through a sequential test to areas at the lowest risk of flooding; brownfield land may not be appropriate for development of a high vulnerability.	It is recognised that flood risk is a key issue for the city centre. A strategic flood risk assessment has been undertaken to assess future flood risks. The text has been amended to better reflect flood risk issues. For example, in relation to more vulnerable (e.g. residential) development this text is considered to reflect all aspects of PPS25.	Amend text to more fully reflect flood risk issues – particularly in the Delivery / Infrastructure section.
La Salle Investment Management on behalf of Coal Pensions Properties	5	5.2.4	Support. Our clients are supportive of the inclusion of City Industrial Park within the proposed City Centre boundary. This acknowledges that City Industrial Park is located within an area of change and that the site is well placed for future redevelopment for appropriate city	Regarding City Industrial Park: Welcome support. Regarding Central Trading Estate: See response to Central Local Housing Office above - it has been agreed to include St Mary's in the city centre. This	Amend the City Centre to include St Mary's.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
			centre uses. Object. It is considered that that the Council should amend the boundary east of the current City Centre to include Central Trading Estate. This is an area of change within the city and is a suitable site for inclusion within the City Centre Boundary as it is closely linked to the city centre and the nearby college. Paragraph 5.2.14 states that the City Centre Action Plan will consider links between the city centre and nearby destinations such as the football stadium, an expansion of the City Centre Boundary would support this policy. The City Centre Boundary should be amended eastwards to include Central Trading Estate.	will result in the Central Trading Estate being included in the city centre.	
Environment Agency	20	5.2.4 City Centre Preferred Option Diagram	We urge Southampton City Council to look at this area differently. The council could make this area of Southampton a thriving waterfront area along the River Itchen without having to extend into the Test estuary. This would reduce the requirement for expensive legal challenges and increased expenditure to go through the Habitats Regulations as government policy in PPG9 states that the first step is to avoid damage to the natural environment, prior to looking at mitigation and enhancement.	Welcome the Environment Agency's recognition that the waterfront is a "huge asset for the city". The Core Strategy's appropriate assessment addresses the relationship between city centre growth in general and ecology designations. The Core Strategy sets the general approach and does not favour one area of waterfront over another. This comes down to specific site based schemes in the City Centre Action Plan, for which there will be specific appropriate assessments. Sites fronting the River Test (e.g. Royal Pier) can create a waterfront destination linked to the old town and commercial heart of the city in a way which sites along the Itchen can not. They should not be ruled out without full assessment.	No change required.
Central Neighbourhoods Partnership and Health & Well Being Partnership	9	PPO 24	Smaller business are losing out to bigger retailers i.e. in city centre	The planning system can make provision for retail floorspace but cannot specify what type of shops should occupy it. All shops fall within the same 'A1' use class. The City Centre Action Plan may be able to encourage / seek to protect certain types of retail provision, but cannot require it. In any case not a Core Strategy issue.	No change required.
Chamber of Commerce	11	PPO 24	Appropriate locations for office developments are the city centre, district centres and City fringe 'gateways'. There needs to be some flexibility in the delivery of the policy.	Office development should address the "city centres first" sequential approach, to comply with Government / strategic guidance, promote centres and sustainable transport. Gateways include gateways to the city (out of centre locations) – which can be defined or marked by other types of development or measures; and gateways to the city centre – which could include landmark office development, in line with the "city centre first" approach.	No change required.
Communities and Renewal Partnership	10	PPO 24	Particular attention needs to be paid to the impact of higher density developments and individual land uses on established residential communities in the City Centre.	Agreed, although high density development can create opportunities for local residents (increased jobs / services) as well as impacts. The Core Strategy's implementation section sets out the range of possible developer contributions, which	Insert section to explicitly state contributions will be sought from city centre developments where

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				could help address impacts.	appropriate to address impacts, including in relation to communities outside the city centre where there is a link.
Environment Agency	19	PPO 24	We urge Southampton City Council to look at this area differently. The council could make this area of Southampton a thriving waterfront area along the River Itchen without having to extend into the Test estuary. This would reduce the requirement for expensive legal challenges and increased expenditure to go through the Habitats Regulations in accordance with PPG9.	Welcome the Environment Agency's recognition that the waterfront is a "huge asset for the city". The Core Strategy's appropriate assessment addresses the relationship between city centre growth in general and designated sites. The Core Strategy sets the general approach and does not favour one area of waterfront over another. This comes down to the City Centre Action Plan, which will set out the strategy for different parts of the city centre, and specific site based schemes. The action plan and where necessary individual applications, will have specific appropriate assessments. Sites fronting the River Test (e.g. Royal Pier) can create a waterfront destination linked to the old town and commercial heart of the city in a way which sites along the Itchen can not. They should not be ruled out prior to a full assessment through the City Centre Action Plan.	More clarity is provided on the appropriate assessment issue, to set out what has and has not been established, and where there is a need for further appropriate assessment.
GVA Grimley on behalf of Development Securities Plc	13	PPO 24	Support designation of the city centre as the primary focus for growth and investment and seek confirmation that each use referred to in the policy is considered equally acceptable outside the Retail Primary Shopping Area.	Welcome support. In terms of PPS6 and the sequential approach, most uses are appropriate in principle anywhere in the city centre; but for retail uses the first focus is the primary shopping area (PSA). Retail uses are not equally appropriate outside the PSA without further assessment first.	No change required.
Ingrid Pettengell-Roese	4	PPO 24	Southampton could be a spa again.	PO24 promotes a distinctive sense of place drawing on the city centre's heritage, and promotes leisure uses. It is not the Core Strategy's role to promote one specific type of leisure use.	No change required.
John Kinghorn	3	PPO 24	This should include a relocated station and the new route of the ring road (plan provided). This would be a high level route on the alignment of West Park Road, continuing across the railway and eliminating the current 'dog leg' of Western Esplanade and Havelock Road. Entrances to the new Central Station would be between the BBC and Skandia House on the east and at the new ring road bridge on the west.	The proposal would involve a fundamental remodelling of Central Station, and major expense. It is unclear that it could be delivered, and so in line with PPS1 (para 26) and PPS12 should not feature in the LDF. It would appear the benefits are marginal and would not outweigh the significant costs. In any case it is not the role of the Core Strategy to address specific individual schemes.	No change required.
Maggie & Richard Jacob	1	PPO 24	Need to capitalise on our greatest asset, our history. Suggest rebuilding the pier, with a new heritage centre on it including the Maritime and Aviation museums. Old floating vessels like Calshot and Shieldhall, British Powerboat Trust vessels and dock tour boats could be grouped there for public viewing. There has been too much emphasis on retail to draw people into the City.	Agree that our history and heritage are a big asset for the city. The Core Strategy's role is to set the overall approach and recognises these issues by referring to distinctiveness, the city's heritage and waterfront. However, retailing is also important for drawing people into the city centre and should not be excluded. The City Centre Action Plan will	No change required..

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				address site specific proposals and such ideas are welcome.	
Nathaniel Lichfield & Partners on behalf of Morley Fund Management Ltd	12	PPO 24	Support	Welcome support	No change required.
Natural England	17	PPO 24	It is difficult to see how this policy could be taken forward without having significant impacts on designated sites. We would suggest that these options were not taken forward until the outcome of any pending Appropriate Assessment.	Support for the overall objectives is welcomed. The Core Strategy's spatial objectives and biodiversity policy reflect the objectives for biodiversity conservation, and the city centre chapter cross references waterfront aspirations with habitat protection. The Core Strategy sets overall principles for general city centre / major development quarter growth, and the appropriate assessment demonstrates that this general growth can occur subject to mitigation measures. Government policy strongly emphasises city centre growth; and the emerging SE Plan explicitly promotes major city centre growth in Southampton, including in the west (e.g. the major development quarter). We agree that the principle of particular site based proposals require further appropriate assessment, and welcome the ongoing dialogue with English Nature / Environment Agency on these issues. In the light of these representations it would be useful for the Core Strategy to provide further clarity on the appropriate assessment position.	Amend objectives to make explicit reference to ecological designations. In Delivery / Implementation text provide more clarity on what the Core Strategy's appropriate assessment establishes and the areas where further appropriate assessment will be required.
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	1	PPO 24	Supporting – in principle the Council's approach to the City Centre, and specifically retail development and the clear retail hierarchy. Reserve further comment until such a time as retail capacity forecasts for the City have been formally published.	Welcome support. The retail capacity forecasts (both convenience and comparison) are now available and will inform the interpretation of these policies	No change required.
Savills on behalf of MDL Developments Ltd	7	PPO 24	The respondent supports this, although it is not clear what a 'dynamic positive waterfront' means. Suggest defining 'dynamic positive waterfront'	Welcome support. The policy has been shortened and this phrase no longer appears	No change required.
Theatres Trust	3	PPO 24	Should be made clearer on cultural facilities with the inclusion of the development of a cultural quarter in the city centre.	Agree there should be specific reference to culture in policy, in addition to the reference at PO 5.2.8. It is not the Core Strategy's role to define quarters – this will be addressed by the City Centre Action Plan.	Amend policy: Include "cultural" in PO24, now CS 1.
Tony Luckhurst	2	PPO 24	There is nothing to take visitors to which represents the city. It's impossible to get near a ship; Mayflower Park with the Royal Pier is a disgrace. In the short term put a retired cruise ship in front of Mayflower Park (or the VT site), compulsory purchase the Royal Pier, remarket this entire area as the Seafaring heritage site and produce a Maritime Logo.	A logo is not a planning matter, although the underlying point about promoting distinctiveness is. The Core Strategy's role is to promote overall principles and PO24 sets the aim of a distinctive sense of place, reconnecting with the waterfront. The City Centre Action Plan will address site specific issues like Royal Pier / Mayflower Park.	No change required.
Public Health, Southampton City	22	PPO 24	Support the commitment to a mixed city centre	Welcome support	No change required.

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Primary Care Trust					
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	3	5.2.8	All references to increases in retail floorspace should be prefixed by the words “at least” on the basis that the DTZ sub-regional study for PUSH is acknowledged (by the authors) to potentially underestimate retail need and the figures quoted in the Core Strategy do not account for need associated with “other town centre retailing”, some of which could be re-directed to Southampton City Centre. Furthermore, the Council’s own City Centre Retailing Background Paper (October 2006) notes that the DTZ study appears to underestimate inflows of expenditure to Southampton, thus potentially suppressing retail need.	The Core Strategy states that projections of need should be subject to ongoing monitoring in the light of the latest data. It is recognised that some factors might increase needs, but there are also other factors which could reduce needs. Stating the needs are a minimum would partially prejudice that on going monitoring. The Core Strategy’s phrase “approximately” is more appropriate. The background paper “city centre retailing” takes account of redirecting needs from out-of-centre locations.	No change required.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	14	5.2.8	CGNU note the broad range of need estimated in the DTZ study and consider it is fundamental that the city’s retail offer is allowed to grow. They consider that there is genuine potential to reduce the leakage of retail activity in the city centre. The extent of this however and the location of new retail development need to be carefully considered and appropriate allocations based upon the requirements of PPS6 and the need to maximise the re-use of brownfield land.	It is considered the Core Strategy takes the approach advocated: planning for major retail growth in the city centre, including an expansion to the primary shopping area (PSA) subject to focusing on the existing PSA first.	No change required
Turley Associates on behalf of Hammerson	4	5.2.8	We feel that, as a long-term forecast, the findings of the DTZ Sub-Regional Study commissioned by PUSH were broadly correct. The DTZ study also acknowledged capacity for new cinema provision and therefore this should be included with the third bullet point.	Support welcome. Agree re cinemas	Amend supporting text to include “cinemas” in list of leisure needs.
GOSE	26	5.2.10	Reference is made to retail need and that the evidence base will not be used to place limits on retail/leisure and office development. It is not clear how this approach accords with the advice in PPS6 (paragraph 2.16).	The paragraph simply states that assessments of need will not be used to control office / leisure development <u>in the city centre</u> ; or retail development <u>in the primary shopping area</u> . PPS6 para 3.8 states the test of need does not need to be considered in these locations. For brevity this sentence has been deleted.	No change required
Nathaniel Lichfield & Partners on behalf of Morley Fund Management Ltd	15	5.2.10	Support the recognition that the PUSH estimates provide only a broad long-term guide and that these will be monitored over time.	Welcome support	No change required
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	16	5.2.11	Supports identification that an area broadly west of Western Esplanade is the appropriate location for a major development quarter within the city centre. The Pirelli site falls within this area and as an edge of centre site offers a sequentially preferable location with which to extend the city centre. It is important that a policy clarifies the scale and nature of development including density targets, in order to maximise the efficiency of this land.	Welcome support. It is agreed that to capitalise on the planning opportunities offered by the major development quarter, it should be high density. It is agreed that guidance on the density of development is a matter for the Action Plan (and subsequent stages), but it would also be useful to establish the principle in the Core Strategy.	Amend policy PO25: Insert: “high density”
New Forest District Council	7	5.2.11	The Council supports the strategy for not proposing any redevelopment involving port land which could have subsequently resulted in pressure to replace the land lost outside the city, and in particular at Dibden Bay. The proposals regarding plans to expand capacity at the port by 40% bring about their own implications which are considered in depth in subsequent submissions.	Welcome support. Proposed extension of city centre boundary at Proposed Submission stage to include parts of the port does not change the position that this is operational port land safeguarded as such. (Flexibility regarding cruise line terminals is carefully worded – see Employment	No change required.

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				chapter)	
La Salle Investment Management on behalf of Coal Pensions Properties	6	5.2.12	Support the designation of a Major Development Quarter. Consideration should be made to the inclusion of City Industrial Park within the Major Development Quarter when defining the precise boundary of the allocation within the City Centre Action Plan.	Welcome support. Comments regarding the City Centre Action Plan are noted and will be considered in that plan. The indicative boundary for the major development quarter on the core strategy's proposal map includes the City Industrial Park. The boundary will be further tested / refined at the City Centre Action Plan stage.	No change required.
Public Health, Southampton City Primary Care Trust	18	5.2.13	We strongly agree that neighbourhoods should be community centres and meet the needs of local people. Could the wording of 'doctors' surgeries' be changed to 'primary health care facilities' which reflects more accurately the range of services that is now offered to local residents. Of course this includes GPs, but also nurse and allied health professional led services.	Support for certain aspects of the chapter is welcomed. Minor text changes proposed to respond to detailed comments.	Rename doctor's surgeries as "primary health care facilities" where they appear in the document.
The Environment Centre	19	5.2.13	Objection - This makes the point that transport and infrastructure needs to keep pace with development. Suggest 'must keep pace' would be better wording and needs to be improved structurally i.e. maybe more public transport and inhibit cars and links to the health aspects of the strategy. This section also refers to necessary open spaces without defining exactly what is mean by necessary.	The sentence has been deleted in the restructured chapter. To some extent development can take place by utilising spare capacity in the existing public transport network. Therefore it is not always the case that new development "must" be accompanied by infrastructure. The chapter's aims promote cycling and walking (and hence health benefits). No references to open space in this paragraph.	No change required.
Environment Agency	22	PPO 25	We are concerned by the lack of information provided on this major development quarter and would request additional information be included.	The Core Strategy's role is to set out the broad location of growth and not detail (PPS12). The Core Strategy text and map identify the broad location and the mix of uses. Further detail is set out in the issues and options paper to the City Centre Action Plan. We are happy to have further dialogue with the EA on this basis.	No change required.
GVA Grimley on behalf of Development Securities Plc	14	PPO 25	Support the major mixed use development quarter proposed. We suggest that a casino use is added to the list of potential uses in order to reflect the current proposals being reviewed with Council Officers.	Welcome support. Make reference to casino in supporting text, reflecting latest position. More guidance can be provided in the City Centre Action Plan once the position becomes clearer.	Amend supporting text: to set out the Council's latest position on Casinos.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	13	PPO 25	Supports the major expansion of the city centre boundary to the west. CGNU's land interests provide a pivotal position between the existing Primary Shopping Area, waterfront and Southampton Central Station which currently comprises relatively low density development.	Welcome support	No change required.
Natural England	18	PPO 25	It is difficult to see how this policy could be taken forward without having significant impacts on designated sites. We would suggest that these options were not taken forward until the outcome of any pending Appropriate Assessment.	Support for the overall objectives is welcomed. The Core Strategy's spatial objectives and biodiversity policy reflect the objectives for biodiversity conservation, and the city centre chapter cross references waterfront aspirations with habitat protection. The Core Strategy sets overall	Amend objectives to make explicit reference to ecological designations. Amend the general policy on city centre

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				principles for general city centre / major development quarter growth, and the appropriate assessment demonstrates that this general growth can occur subject to mitigation measures. Government policy strongly emphasises city centre growth; and the emerging SE Plan explicitly promotes major city centre growth in Southampton, including in the west (e.g. the major development quarter). We agree that the principle of particular site based proposals require further appropriate assessment, and welcome the ongoing dialogue with English Nature / Environment Agency on these issues. For example, further assessment would be required for any sites involving reclamation. This is a site specific issue because neither the major development quarter, nor the general core strategy city centre approach, require this. In the light of these representations it would be useful for the Core Strategy to provide further clarity on the appropriate assessment position.	growth to require environmental mitigation and in text provide more clarity on what the Core Strategy's appropriate assessment establishes and the areas where further appropriate assessment will be required.
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	2	PPO 25	Supporting – in principle the Council's approach to the City Centre, and specifically retail development and the clear retail hierarchy. Reserve further comment until such a time as retail capacity forecasts for the City have been formally published.	Welcome support. The retail capacity forecasts (both convenience and comparison) are now available and will inform the interpretation of these policies	No change required.
Public Health, Southampton City Primary Care Trust	19	PPO 25	We understand that Southampton is a major retail centre and that this is an important part of the local economy, but we are concerned that giving this priority will limit the development opportunities for the city. As we stated in our original response, retail employment is often low paid, and will fuel the cycle of low expectations and low pay amongst the less well off people in Southampton. We are also concerned that a retail focus to the city will create a culture of 'shopping' and debt and have a major impact on the health and well being of the population, particularly the less well off. Support the commitment for a mixed city centre but we are concerned that there is too much emphasis on retail development and would like to see a similar strong commitment to leisure, tourism, and other commercial development.	Support for mixed use city centre development, and recognition of the importance of retailing is welcomed. Do not agree that the Core Strategy prioritises retailing (PO24 and 25 promotes all uses). Whereas Government guidance promotes most uses across city centres, it seeks extra controls on retail development. Therefore the Core Strategy needs to address retail issues in more detail. It places more control on retail development than other forms of development, rather than give it priority. The emerging City Centre Action Plan addresses all uses in more detail. The Council reiterates its response at Core Strategy issues and options stage to the issues raised. (In brief: Government policy promotes retail growth in city centres; retailing is an important aspect for Southampton; the Core Strategy and other Council / public activities promote an increase in skills levels; the retail sector plays a useful role in the wider labour market).	No change required.
RSPB	12	PPO 25	Objection – Paragraph 5.2.7 of the Preferred Options Core Strategy DPD acknowledges that the proposals for opening parts of the City Centre with the waterfront may involve issues relating to protection of the natural environment and flood risk. PPO 25 does not	The PO Core Strategy made reference to these issues. It is agreed that flood risk and ecological designations are two issues in relation to city centre growth in general, and so references should be	Amend objectives to make explicit reference to ecological designations.

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			<p>acknowledge the requirements of the Habitats Regulations in respect of biodiversity or PPG25 in respect of flooding. We understand that Southampton City Council is preparing an Appropriate Assessment of the Core Strategy, and we anticipate that the effects of PPO 25 on the SPA will have received thorough assessment. The RSPB therefore reserves the right to provide a further response to the City Council in respect of the proposed waterfront development, in our wider comments on the appropriate assessment. Much of the waterfront area of Southampton falls within the Environment Agency's indicative floodplain. It is essential that, in accordance with PPG25, PPO 25 acknowledges that any development proposals would be subject to the completion of a Flood Risk Assessment.</p> <p>Suggest the following changes: 'The area within the city centre broadly west of Western Esplanade / Harbour Parade, provides a potential opportunity for a comprehensive major mixed use development quarter, <u>if after further assessment it can be confirmed that the proposal would not have an adverse effect on the integrity of the nationally and internationally designated nature conservation sites in and close to Southampton Water, and it would not result in an increased risk of flooding.</u> The mix of uses will include retail, leisure / cultural /tourist, office, residential and any necessary local community facilities. The mix and scale of development will be that required to help maintain and enhance the city centre's regional role, subject to the retail policy option 24 below.'</p>	<p>included at the start of the chapter to cover all city centre development (including and not exclusively PO25, which in any case is not itself "waterfront" development). The Core Strategy appropriate assessment, strategic flood risk assessment and PPS25 demonstrate that in principle and in general, city centre growth is acceptable, subject to the implementation of important mitigation measures. The supporting text needs to state this, explain further assessment is required for certain sensitive proposals, and cross refer to the relevant policy requirements in the Core Strategy. We welcome ongoing dialogue with the RSPB and other agencies on these issues. The preferred options background paper on alternatives considered explain why there are no alternative options for the major development quarter.</p>	<p>Provide more clarity in the Delivery / Implementation text on what the Core Strategy's appropriate assessment establishes and the circumstances where further appropriate assessment will be required.</p> <p>Amend text in Delivery / Implementation section to clarify what the Core Strategy's strategic flood risk assessment demonstrates.</p>
SEEDA	2	PPO 25	<p>I understand that residential development may not go ahead on the Waterfront. If this is the case will this and its implications need to be reflected in the plan?</p>	<p>Policy PO25 does not specifically relate to waterfront development. The opportunities for housing on waterfront sites depend on various planning requirements and landowner aspirations, and will be addressed in the City Centre Action Plan. The impact on housing delivery is addressed by the Strategic Housing Land Availability Assessment.</p>	<p>No change required.</p>
Theatres Trust	4	PPO 25	<p>This is not consistent with the Cultural Strategy which states that a cultural quarter will be developed in the north.</p>	<p>It is agreed that a cultural quarter is promoted in the north of the city centre (Northern Above Bar – established in the local plan). This does not preclude the possibility of further cultural uses in the major development quarter in the long term. This option should not be closed off. The policy is intended to facilitate cultural development rather than require it.</p>	<p>Amend policy to make clear the mix of uses should include leisure, cultural or tourist uses (rather than requiring all three).</p>
Turley Associates on behalf of Hammerson,	5	PPO 25	<p>Hammerson does not support the identification of the Major Development Quarter within the Core Document and maintains its longstanding position that further westward shift of the City Centre is not appropriate. There remain a number of sequentially preferable sites within the City Centre Core which could accommodate the identified retail capacity at least in the medium</p>	<p>The support for the overall objective of city centre growth, and in broad terms, for the retail growth targets, is welcome.</p> <p>The Core Strategy proposes a major development quarter in the west of the city centre. This area is</p>	<p>No change required.</p>

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			<p>term. It is premature to identify a large edge-of-centre site before Donaldson's report on appropriate sites and without establishing what the existing city centre can accommodate – a point acknowledged by the Local Plan Inspector.</p> <p>The capacity and need for new comparison goods floorspace should be phased and first prioritise existing sequentially preferable opportunities within the PSA such as West Quay III. The Council should allocate sufficient sites to meet the identified need for at least the first five years as advocated in PPS6 (paragraph 2.52). The Core Strategy should focus primarily on short-medium term priorities and opportunities before then considering and assessing in a future review how the PSA should be extended.</p> <p>Suggest deleting policy PPO25</p>	<p>close to and between the central railway station and the existing primary shopping area; would make more efficient use of previously development land; and would be accessible to deprived communities.</p> <p>The Core Strategy proposes a mix of uses to include retail, leisure, offices, and residential development.</p> <p>Government policy seeks a long term, pro-active and positive vision for city centres; promotes development which is close to public transport, re-uses previously developed land, and benefits social inclusion. In addition, emerging regional policy promotes Southampton's regional status and identifies the western part of the city centre for major development.</p> <p>Government policy (and specifically the sequential approach) establish that, in terms of locational principle, leisure, office, residential and other non retail city centre uses are acceptable anywhere in the city centre, and particularly close to the central railway station.</p> <p>Therefore it is considered that Government and regional policy support the principle that the Core Strategy identifies a major development quarter for long term mixed use growth of leisure, office and residential development in this broad location. For this reason alone, the policy should not be deleted.</p> <p>Turning specifically to the issue of retail development. Taking Government and regional policy as a whole, it requires the Core Strategy to set out a positive, pro-active and long-term vision for retail growth in the city centre; and requires that this growth be focussed in the existing primary shopping area (PSA) first where possible. Subject to this, there should then be positive planning for an expansion of the PSA, including for large scale development, where needed. The emerging South East Plan sets long term targets for retail growth in South Hampshire through to 2026. There is evidence to demonstrate a large need for further retail floorspace in Southampton city centre, and the likelihood that only a proportion of this can be met within the existing PSA, including West Quay 3 (both in the first 5 years following adoption of the</p>	

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				<p>plan, and over the longer term to 2026). This evidence includes studies on retail need (DTZ) and the capacity of sites in the PSA (Donaldsons).</p> <p>Against all of the context above, it is appropriate for the Core Strategy to take the position it does: to indicate the long-term expansion of the PSA in the west of the city centre, subject to the sequential approach controls. It includes guidelines on need and capacity over 5 year periods. The plan, therefore, prioritises first sites in the PSA, and seeks to retain a coherent overall centre.</p> <p>In the last local plan review, the Inspector recommended the deletion of edge of centre sites which had been allocated for retail development with no caveats, and in the absence of a study of sites in the PSA. The Core Strategy is taking a different position: it is identifying an expansion of the PSA subject to sequential controls, and against the background of an assessment of needs and of sites in the PSA.</p> <p>A failure of the Core Strategy to take this strategic direction would not conform to national / regional policy guidance to look positively over the long term regarding city centre growth, and would not provide sufficient certainty.</p>	
Nathaniel Lichfield & Partners on behalf of Morley Fund Management Ltd	17	5.2.16	Supports clarification that the first priority will be to focus new retail floorspace within the existing Primary Shopping Area and that it is likely that an extension to this area will be required over the Plan period.	Support welcome	No change required.
Environment Agency	23	PPO 26	We are concerned by the lack of information provided on this major development quarter and would request additional information be included.	The Core Strategy's role is to set out the broad location of growth and not detail (PPS12). The Core Strategy text and map identify the broad location and the mix of uses. Further detail is set out in the issues and options paper to the City Centre Action Plan. We are happy to have further dialogue with the EA on this basis.	No change required.
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	4	PPO 26	The words "After 2011" should be removed because of the level of need identified by the DTZ sub-regional study in Southampton before 2011; it is unnecessary due to the inclusion of criteria 1 & 2 in PPO26; and because of the advice of paragraph 2.6 of PPS6, which acknowledges that extension of primary shopping areas may be appropriate where a need for large development has been identified and cannot be met within the centre.	The "city centre capacity study", assessing the deliverability of sites within the primary shopping area (PSA), has now been completed. This suggests that even in the short term, not all needs can be met in the existing PSA. Therefore it is agreed that an arbitrary date before which expansion cannot be permitted is not appropriate. The policy sets the appropriate criteria (need / sequential approach) against which planning	Delete "After 2011" from policy PPO26 and amalgamate PPO26 with PPO25.

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				applications for a specific development can be judged against the circumstances at that time. This policy will be amalgamated with PPO 25, now CS 2.	
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	3	PPO 26	Supporting – in principle the Council's approach to the City Centre, and specifically retail development. They also support the setting out of a clear retail hierarchy within the document for the Authority area. They will reserve further comment until such a time as retail capacity forecasts for the City have been formally published.	Welcome support. The retail capacity forecasts (both convenience and comparison) are now available and will inform the interpretation of these policies	No change required.
Public Health, Southampton City Primary Care Trust	20	PPO 26	We understand that Southampton is a major retail centre and that this is an important part of the local economy, but we are concerned that giving this priority will limit the development opportunities for the city. As we stated in our original response, retail employment is often low paid, and will fuel the cycle of low expectations and low pay amongst the less well off people in Southampton. We are also concerned that a retail focus to the city will create a culture of 'shopping' and debt and have a major impact on the health and well being of the population, particularly the less well off. Support the commitment for a mixed city centre but we are concerned that there is too much emphasis on retail development and would like to see a similar strong commitment to leisure, tourism, and other commercial development.	See earlier response to the PCT's comment on PPO25.	No change required
Turley Associates on behalf of Hammerson	6	PPO 26	The capacity and need for new comparison goods floorspace should be phased throughout the lifetime of the Core Strategy and first prioritise existing sequentially preferable opportunities within the PSA such as West Quay III. The Council should allocate sufficient sites to meet the identified need for at least the first five years as advocated in PPS6 (paragraph 2.52). The Core Strategy should focus primarily on short-medium term priorities and opportunities before then considering and assessing in a future review how the PSA should be extended. Suggest deleting policy PPO26.	See earlier response to Turley Associates on behalf of Hammersons	See earlier response to Turley Associates on behalf of Hammersons
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	5	5.2.18	Whilst we assume the drafting relates to the formal expansion of the PSA (via the LDF process) rather than through planning permissions being granted, the paragraph should be removed since it could be read to prejudge applications for retail development which do demonstrate a need and which prove that an edge of centre site passes the sequential test.	In response to other representations, the 2011 threshold in PPO26 has been deleted, and so this paragraph can be deleted.	Delete PO paragraph 5.2.18, which explained why the primary shopping area would not be expanded before 2011.
Nathaniel Lichfield and Partners on behalf of Morley Fund Management Ltd	18	5.2.18	Object – this can only be assessed by way of a detailed retail study. This work will be undertaken when the City Centre Area Action Plan is being formulated and therefore this is the time when the PSA should be reviewed.	The "city centre capacity study", assessing the deliverability of sites within the primary shopping area (PSA), has been completed. This suggests that even in the short term, not all needs can be met in the existing PSA. Therefore it is agreed that an arbitrary date before which expansion cannot be permitted is not appropriate. The policy sets the appropriate criteria (need / sequential approach) against which planning applications for a specific development can be judged against the	Delete "After 2011" from policy PPO26 and amalgamate PPO26 with PPO25.

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				circumstances at that time. This policy will be amalgamated with PPO 25, now CS 2.	
Drivers Jonas on behalf of SEEDA	13	PPO 27	SEEDA considers Woolston to be an appropriate location for hotel development and help to make the waterfront a destination, provide accommodation for business people attracted by the increased employment provision and help to deliver tourism benefits. Question whether criterion 4 is realistic as the majority of all types of development are likely to increase car usage by some proportion. Suggested alternative wording – ‘Having regard to the specific proposal the development will not significantly increase car travel and is reasonably accessible by means of travel other than the car’.	PPS6 states that the criteria set out in PPO27 apply to hotel uses. The policy has now been deleted and replaced by a criterion in CS3, so the reference to distances travelled by car has been deleted. Waterfront regeneration can be achieved in a number of ways and does not necessarily require a hotel. However PPS6 does refer to regeneration and it is important to set out in what circumstances this might be taken into account. There are strong reasons for applying PPS6 policy and so there would need to be strong regeneration benefits to outweigh this. The Core Strategy does not define the boundaries of district centres – this will be considered in the subsequent sites DPD.	Amend text to state that regeneration issues will be taken into account where there is a strong and distinctive benefit which cannot be provided by other means.
GOSE	27	PPO 27	The criteria do not include scale, as set out in PPS6 (paragraph 2.28).	The policy has now been deleted so as not to repeat national guidance, and been replaced by a criterion in CS3 which cross refers to PPS6	No further change required
Highways Agency	14	PPO 27	All edge/out of centre developments should not increase car travel on the trunk road network, either in overall daily terms or during the congested peak hours.	In line with Government guidance, PPO27 seeks that development is in accessible locations which will help reduce car travel on the trunk road network. The transport chapter sets out transport considerations for all development in more detail, including the need for a highway assessment.	No change required.
Indigo Planning Ltd on behalf of IKEA Properties Investments Ltd	6	PPO 27	We object to criteria 4, on the basis that “increase car travel” is not clearly defined and is not, in any event, a reasonable criteria by which to judge a planning application when, for example, an increase in local car travel may prevent or discourage longer journeys elsewhere. There is no suggestion in PPG13 that increases in car travel amount to a reason to refuse planning consent.	The policy has now been deleted so as not to repeat national guidance, and been replaced by a criterion in CS3 which cross refers to PPS6	No further change required
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	7	PPO 27	This policy option should be rewritten to recognise the roles that district centres and local centres, which are defined as town centres in PPS6, and out of centre retail and leisure facilities can play in the regeneration of areas and in creating sustainable communities. The largest centres should not be overly dominant, and there is a requirement for a more even distribution of town centre uses to ensure that people’s everyday needs are met at the local level.	The town / district / local centres policy promotes the role of district and local centres. The purpose of this policy is to control “edge” and “out of centre” developments (and has now been incorporated into CS3). This control will benefit district / local centres. The supporting text ensures that proposals with a local catchment around a district centre need not consider city centre locations, which will also benefit district centres. The background paper “city centre retailing” considers the scale of growth in the city centre in relation to surrounding centres, including district centres, to ensure the city centre does not become over dominant. In terms of out of centre development, PPS6 establishes that regeneration benefits do not eliminate the	Amend Policy to include priority order of centres. Set out hierarchy of centres in Neighbourhoods policy. Amend text to state that regeneration issues will be taken into account for retail schemes where there is a strong and distinctive benefit which cannot be provided by other means, and to

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				requirement to consider tests in PPS6. However it is recognised that regeneration could be taken into account where there are strong reasons. It is also recognised it would be useful to more explicitly state the hierarchy of centres.	more clearly identify the hierarchy.
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	4	PPO 27	Supporting – in principle the Council's approach to the City Centre, and specifically retail development. They also support the setting out of a clear retail hierarchy for the Authority area. They will reserve further comment until the retail capacity forecasts for the City have been formally published.	Welcome support. The retail capacity forecasts (both convenience and comparison) are now available and will inform the interpretation of these policies	No change required.
Public Health, Southampton City Primary Care Trust	21	PPO 27	We understand that Southampton is a major retail centre and that this is an important part of the local economy, but we are concerned that giving this priority will limit the development opportunities for the city. As we stated in our original response, retail employment is often low paid, and will fuel the cycle of low expectations and low pay amongst the less well off people in Southampton. We are also concerned that a retail focus to the city will create a culture of 'shopping' and debt, which will have a major impact on the health and well being of the population, particularly the less well off. The commitment in Preferred Policy Option 24 is for a mixed city centre, and we support this approach. We are concerned that there is too much emphasis in this section on retail development and we would like to see the commitment to leisure, tourism, and other commercial development expressed as strongly as the commitment to the retail sector.	See earlier response to PCT's comments on PPO25.	No change required
Turley Associates on behalf of Hammerson	7	PPO 27	Whilst Hammerson acknowledge the basis and underlying thrust of PPO27, we believe that the policy would benefit from the use of terminology advocated in PPS6 and changed as follows: Retail, Leisure and Hotel Development greater than 750 square metres (gross) in "edge of centre" and "out of centre" locations will only be permitted if all of the following criteria are met: <ol style="list-style-type: none"> 1. There is a need for the development 2. This need cannot be appropriately met in a sequentially preferable better location, as defined in paragraph 5.2.23. 3. The development will not undermine the vitality, viability or role of an existing centre. 4. The site is development-will not increase car travel and is reasonably accessible by a choice of means of transport travel other than the car. 	The policy has now been deleted so as not to repeat national guidance, and been replaced by a criterion in CS3 which cross refers to PPS6	No further changes required
Theatres Trust	2	PPO - Omission	Core Strategy should have regard for the Cultural Strategy and include policies covering the protection and promotion of existing cultural facilities and the development of new cultural facilities. PPO 27 does not deal with the creation of a cultural quarter or enhancement of existing cultural facilities. The Core Strategy is unsound – it is not consistent and has not had proper regard to "any other relevant plans, policies and strategies relating to the area", in this case Southampton's Cultural Strategy.	The Core Strategy's role is to set the strategic approach. As such, it is important that cultural facilities are referred to in the aims. The cultural quarter, and protection of existing facilities, are site based issues which will be addressed in the City Centre Action Plan.	No change required

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 24 City Centre Approach – now CS 1**
 - **PPO 25 Major Development Quarter – now CS 2**
 - **PPO 26 Retail Primary Shopping Area – policy deleted and incorporated into CS 2**
 - **PPO 27 Retail, leisure and hotel development - policy deleted and incorporated into CS 3**
- **Policies and reasoned justification in chapter 4 ‘Spatial strategy and policies’**

Chapter 5.3 – Neighbourhoods

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Natural England	19	5.3.1	We strongly support the statement in 5.3.1 and would be happy to help SCC develop DPDs and SPDs that would help achieve these aims. We feel that there is great scope for environmental improvement as part of well planned regeneration. However we would advise that careful consideration for increased housing and development is given to locations that are on the coast or in the flood plain as to their suitability in the long term (for example Weston).	Welcome support and note concerns about the location of development.	No change required
Public Health, Southampton City Primary Care Trust	23	5.3.2	We are pleased that health and education facilities are specifically mentioned.	Welcome support	No change required
The Environment Centre	22	5.3.6	Objection - In terms of building requirements there is very little detail mentioned as to what extent developers will be required to employ sustainable practices, standards and materials. No limits/targets are established on reducing the energy use of buildings. In the next stage we would like to see some way of monitoring whether homes achieve carbon neutrality such as a requirement that all new buildings should meet recognised standards of Eco-homes or BREEAM to the highest order. There should be a checklist or similar method to ensure that developers are employing sustainable practices and a penalty system if these are not met. There should be ambitious targets for new developments to meet regarding water and resource use.	Concerns noted. Since the Preferred Options were published the PPS on Climate Change and the Code for Sustainable Homes have been released. The Proposed Submission document will include references to this guidance and seek to enforce some requirements for greater resource efficiency in new developments. The Proposed Submission Core Strategy will include more information on delivery and monitoring of policies. A SPD will provide more details on the implementation of the sustainable development policy.	No change required
Communities and Renewal Partnership	19	5.3.8 Neighbourhoods Preferred Options Diagram	Map (p60) missed out Lordshill PN, and Bevois & Bargate wrongly labelled as Central	Note corrections which will be changed in Proposed Submission document.	Correct mistakes in diagram
The Environment Centre	23	5.3.9	Objection - this states that there should be a 'presumption' of liaison between neighbourhood partnerships and developers - this should be changed to 'requirement'	A presumption of liaison will provide flexibility if proposals do not require this consultation for whatever reason.	No change required
Communities and Renewal Partnership	20	5.3.9 Neighbourhood Management Diagram	Error in diagram (p62) – LNRS stands for Local Neighbourhood Renewal Strategy	Note corrections. This will be corrected; however this diagram will not be included in the Proposed Submission document.	Correct diagram for use in background paper if required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	8	5.3.12	Government objectives in PPS6 are outlined at paragraph 1.4 as being: enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially-excluded groups; supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and improving accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport. The commentary in Paragraph 5.3.12 omits to outline the key role that retailing and leisure plays in providing neighbourhoods with services to ensure sustainability.	The Development Plan for the city will incorporate national planning guidance including PPS6. Although these objectives are supported, it is not necessary to repeat these in the Core Strategy.	No change required
Bovis Homes	6	PPO 28	Welcomes the approach set out. However, it requires the Council to look closely at its neighbourhoods and to undertake changes in order to ensure that benefits are provided to local communities. Its reluctance to reassess the value to the community of the former Civil Service Sports Ground at Malmesbury Road does, however, tend to suggest the Council will not be prepared to adopt positive plan-led change as proposed under this option.	Note concerns over the implementation of policies. The policies in the Core Strategy will form the key principles for development in the city and their successful implementation will require commitments from both the public and private sector.	Ensure that the section on the implementation of policies does not solely focus on contributions from the private sector.
Communities & Renewal Partnership	11	PPO 28	Support the overall approach to neighbourhoods especially the protection of community facilities and local services.	Welcome support	No change required
Ingrid Pettengell-Roese	1	PPO 28	Suggestions for improve neighbourhoods; to give every house dweller a tree for their front garden which will lead to a reduction in crime, renaming street names, making hardcore areas into parks, banning lorries from residential roads	Welcome suggestions for improving neighbourhoods. The Core Strategy will set out key principles for development; later documents will consider more detailed issues and proposals such as these.	No change required
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	9	PPO 28	Government objectives in PPS6 are outlined at paragraph 1.4 as being: enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially-excluded groups; supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and improving accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport. The commentary on this should be included in PPO 28.	The Development Plan for the city will incorporate national planning guidance including PPS6. Although these objectives are supported, it is not necessary to repeat these in the Core Strategy.	No change required
Public Health, Southampton City Primary Care Trust	24	PPO 28	We strongly support this approach to improving neighbourhoods. Neighbourhood centres: We particularly applaud the approach that has been taken here which describes the history and identity of different centres in the city. We feel it is helpful for people's sense of identity and belonging to understand more about the heritage of the places in which they live.	Welcome support.	No change required
The Environment Centre	24	5.3.13	Objection - The definition that the Council are using for Sustainable Communities/ Neighbourhoods is unclear. This should be stated as this could mean any number of things and the term is used frequently. Without the definition being clear it is difficult to comment on much of this section.	Note comments. The policy on sustainable communities has been deleted.	Add in a glossary

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Communities and Renewal Partnership	12	PPO 29	Support the overall approach to neighbourhoods especially the protection of community facilities and local services.	Welcome support	No change required
The Environment Centre	21	5.3.16	Objection - There is mention made of improving secondary local centres such as Shirley High Street. Whilst establishing that these areas currently have access problems and congestion, it goes on to say that the use of the area should be intensified. This would take the pressure off the city centre but it does not address the current problems. Before increasing the pressure on local centres such as Shirley, public transport links alongside bike and pedestrian access should be improved.	Agree that intensification must be accompanied by improvements to public transport, cycle and pedestrian links	No change required
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	10	5.3.21	Within the Bitterne District Centre commentary there is no mention made of the lack of available sites within Bitterne which is currently contributing towards the loss of trade out of the area. The Local Development Framework needs to recognise this leakage of expenditure, and that to create sustainable neighbourhoods, provision will have to be made in edge or out of centre locations to meet the needs of east Southampton.	Note concerns about land availability in Bitterne district centre. The Core Strategy will set out general principles for development. Detailed policies and information on specific areas and sites will be contained in further DPD.	No change required
Mr E Hawkins	1	5.3.23	As a resident of Bitterne for over 50 years, I would like to suggest that a, weekly or monthly market be held in Bitterne precinct. This would put some life into the area and should encourage traders to start businesses in the empty shops. There is plenty of space for market stalls.	Welcome suggestion on how to improve Bitterne district centre. Further DPD will consider more detailed proposals about specific areas.	No change required
Turley Associates on behalf of the Pressmile Ltd	18	5.3.24	The information set out in paragraph 5.3.24 in respect of Woolston is supported, but it is considered that greater recognition should be given to the implications of both existing development and the potential for additional development at Willments Shipyard (see plan attached). The Willments development represents a major opportunity to complete the city gateway, through the comprehensive redevelopment of an underused employment site in a key location of the city. It could be redeveloped to accommodate new development, whilst replacing the existing employment provision with a similar level of development that is better suited to meet modern needs.	Welcome support on Woolston District Centre. The Core Strategy will set out general principles for development. Detailed policies and information on specific areas and sites will be contained in further DPD.	No change required
Drivers Jonas on behalf of SEEDA	14	5.3.26	On basis of the current proposals and the supporting retail impact assessment, SEEDA requests that the Council review the current District Centre boundaries of Woolston with a view to extending this boundary to include an area generally opposite the existing Co-op store and the area surrounding the proposed public square and adjacent waterfront. This will assist in linking the district centre to the river, providing a sense of place and focus for the community, providing for civic activity which enhances the vitality and viability of the district centre. Any policy relating to development in Woolston should also make provision for development to be phased to allow early delivery of key elements on key parts on the site.	Welcome suggestion on how to improve Woolston district centre. Further DPD will consider more detailed proposals about specific areas including changes to the boundary of centres.	Ensure that the policy provides the opportunity for other DPD to consider the boundaries and designations of local and district centres

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Communities and Renewal Partnership	14	5.3.29	The need to remodel Lordshill District centre is welcomed as it features in the Lordshill Action Plan. However other Actions in the Action Plans are not – - Re-invigorating the shopping parade at Exford Avenue - Providing community (especially youth) facilities at Townhill Park and in the city centre - Considering the use of planning policy to control the number of hot food establishments which are replacing the shops on Burgess Road	Welcome support for redevelopment at Lordshill. Further DPD will consider more detailed proposals about specific areas and detailed development control policies.	No change required.
Highways Agency	15	5.3.31	The accessibility of community facilities by sustainable transport should be a key factor in determining their location, as this may have the potential to reduce the need to travel to larger urban areas and align with PPG13. Additionally the HA would recommend that the neighbouring local authorities are taken into consideration, in order to align with PPS12.	Accessibility will be an important consideration in any development proposal. However, this section provides the opportunity to retain small scale community facilities which, whilst located in areas of low accessibility such as within residential areas, serve the local community.	No change required.
Intchen Gospel Halls Trust	1	5.3.31	We are concerned that full provision should be made in the Core Strategy for sites for churches, faith schools and burial grounds.	Note concerns. The Core Strategy seeks to support places of worship and ensure good access to education facilities. More detailed policies will be contained in later DPDs.	No change required.
Public Health, Southampton City Primary Care Trust	25	5.3.31	Could the wording 'doctor's surgeries' be changed to 'primary health care facilities'.	Agree	Replace 'doctor's surgeries' by 'primary health care facilities'
Communities and Renewal Partnership	13	PPO 30	Support the overall approach to neighbourhoods especially the protection of community facilities and local services.	Welcome support	No change required
GOSE	6	PPO 30	We note the reference to community safety, but it is not clear that other issues have been taken into account such as crime and its relationship with the LDF. PPS12 (paragraph 1.8) states that spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.	The Core Strategy will set out the general principles in order to deliver high quality development and well designed and sustainable neighbourhoods. Reference will be made to crime in relation to improved access and paths as this has been identified as a failing of some new developments in Southampton. Detailed policies and information on issues such as crime will be contained in further DPD.	Include reference to safe access and paths in the Core Strategy
Jones Lang LaSalle on behalf of Rokeby (Southern) Ltd	11	PPO 30	The Antelope House site on Bursledon Road should be allocated as an established out of centre location for retail and leisure uses reflecting the recent permission recommended for approval by the Secretary of State in the recent appeal decision and its major site allocation in the Local Plan Review.	Note comments. As stated in PPO30, further DPD will consider the need for more local centres and detailed proposals for specific areas.	No change required
SEEDA	4	PPO 30	Suggest that more information is added on the potential for major redevelopment in Woolston centre and actions to achieve this. The current nature of difficulties on the High Street for the local traders is a major issue but no further information on the 'potential' is highlighted or expanded on.	The Core Strategy will set out general principles for development. Detailed policies and information will be contained in a further DPD.	No change required

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V Roberts	1	PPO 30	With an increasing elderly population needing to live independently and a need to curtail car use, we need to retain business parades in local centres, especially those providing a particularly diverse range of services and goods as provided in Thornhill Park Road. These give character to the area and engender a sense of place. It is important to protect these businesses from the supermarket multiples that take money out of the area and contribute to greenhouse gas emissions as a result of their distribution systems. Thornhill Park Road shopping parades need street scene enhancement.	Agree with the need to retain local centres and their importance to local communities. Further DPD will consider more detailed proposals about specific areas.	No change required
Public Health, Southampton City Primary Care Trust	26	5.3.36 (5.4.36 in error)	We disagree that these are the principal health services in Southampton. 90% of health care is delivered by primary care in the community. These are the principal acute care centres. Southampton General Hospital and Princess Anne Hospital are part of Southampton University Hospitals NHS Trust. Southampton General Hospital is an acute hospital serving South West Hampshire and a tertiary centre, offering specialist services to a large area covering the central south coast of England, with strong links to the University of Southampton and an internationally acknowledged graduate and post-graduate medical school.	Note comments. Amend text reflect the PCT's comments.	Amend supporting text to state that 90% of health care is delivered by primary care in the community.
Southampton University Hospitals NHS Trust	1	5.3.36 (5.4.36 in error)	SUHT supports and welcomes this paragraph.	Welcome support	No change required.
Public Health, Southampton City Primary Care Trust	27	5.3.37 (5.4.37 in error)	Health Services - We are pleased that there is a section on health services. However we request that this section be rewritten as there are a number of inaccuracies. Southampton City PCT is responsible for the provision of health care for the people of Southampton. From 2007 it will operate the RSH as well as the Western and Moorgreen Hospital sites. Southampton City PCT also provides primary health care from GP practices, and the Walk in Centres in Bitterne and Shirley. It also provides community healthcare, dental health care, ophthalmic and pharmacy services.	Note comments. Text will be amended to correct inaccuracies.	Amend supporting text to refer to services for which the PCT is responsible.
Drivers Jonas on behalf of SEEDA	3	5.3.36 (5.4.36 in error)	Paragraph numbering changes within this chapter.	Noted. Please note that the structure of this document and the paragraph numbering will change.	Check paragraph numbering in Proposed Submission Paper

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Southampton City Primary Care Trust	1	5.3.37 (5.4.37 in error)	<p>While agreeing in principle that there should not be a loss of 'other health facilities', particularly those in accessible locations, there are practical concerns such as health and welfare provision issues that must be considered. Primary Care Trusts (PCTs) control 80 per cent of the total NHS budget and must operate in the most cost efficient way possible, whilst providing a high quality service accessible to all members of the public. A health facility may cease to be viable and suitable due to a raft of reasons including demographic changes, changes in the operation of practices and advances in technology. More flexibility is required in the provision of such services in the long term and indeed in the Council's policies. To employ a blanket approach that prevents the redevelopment of sites, where the need for redevelopment can be demonstrated, will only stifle the PCTs and will not benefit patients.</p> <p>Re-word paragraph to read: 'Other health facilities are operated by the Southampton City Primary Care Trust (SCPCT); some of these include GP surgeries, dentists, medical institutions, care homes (use class C2) and health 'walk in' centres. There should be a presumption against their loss in the communities, particularly those in accessible locations (as defined by the PTAL map – Transport Section)'. <u>However where it can be proven that such services are no longer deemed appropriate in terms of demand, technology, financial viability, operation or it can be demonstrated that they are not suitable in size or form in their current location, redevelopment proposals could be considered.</u></p>	<p>Accept the need to retain flexibility in health care facilities and welcome information on the PCT. Paragraph will be redrafted to ensure sufficient flexibility; seeking to prevent the loss of health facilities unless strong justification is provided. This policy safeguards important health facilities in accessible locations. Whilst health services are key to sustainable communities, this policy should recognise the need for flexibility for their provision.</p>	<p>Ensure policy text clearly safeguards healthcare facilities.</p>
Public Health, Southampton City Primary Care Trust	28	5.3.38 (5.4.38 in error)	<p>We agree that a healthy city should have high air quality and be free from unacceptable noise. It should also have a high quality built environment and access to green spaces.</p>	<p>Agree</p>	<p>No change required.</p>
Communities and Renewal Partnership	15	PPO 31	<p>PPO31 should be more specific about there being a presumption against the loss of local health facilities (as it says in para 5.4.37).</p>	<p>This policy safeguards important health facilities in accessible locations. The policy should be revised to list the principal acute health care facilities; these were previously listed in para 5.4.36 in the Preferred Options document. Whilst health services are key to sustainable communities, this policy should recognise the need for flexibility for their provision.</p>	<p>Amend policy to include a list of the principal acute health care facilities.</p> <p>Ensure policy text clearly safeguards healthcare facilities</p>
Southampton University Hospitals NHS Trust	2	PPO 31	<p>SUHT supports this policy. However paragraph 3 re HIAs should be expanded to include access to healthcare provision. It is important that larger developments ensure that access is available to healthcare provision required as a result of that development and fund improvements to means of access. At the end of Para. 3 re HIA it should be added and access to that provision.</p>	<p>Welcome support. We are currently examining how HIA can be integrated with existing Sustainability Appraisal tools and the sustainability statement required for major planning applications based on the sustainability checklist.</p>	<p>No change required.</p>
V Roberts	2	PPO 31	<p>It is extremely important that residential neighbourhoods have high air quality and be free from unacceptable noise.</p>	<p>Agree</p>	<p>No change required</p>

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Public Health, Southampton City Primary Care Trust	29	5.3.39 (5.4.39 in error)	The principal education providers in the city are the schools and then the University. We feel it is important to acknowledge the importance to the development of the city of excellent schools.	Agree	Amend supporting text
Public Health, Southampton City Primary Care Trust	30	5.3.41 (5.4.41 in error)	We would like this to be rephrased to express stronger commitment to the protection of playing fields. We would hope that only in very exceptional circumstances will playing fields be built on.	There is national planning policy to protect playing fields and any proposals for their redevelopment must have strong justification.	No change required
Bovis Homes	7	PPO 32	Support the broad objective of this policy. It is understood that the council is already engaged in a review of its educational needs and establishments. It is quite possible that the council will therefore need to acquire further land for educational and associated uses or redevelop existing school sites. It must be prepared to accept that some changes are necessary – as it stands the Policy does not appear sufficiently flexible to deal with changing circumstances.	Welcome support. This policy seeks to improve access to education facilities and therefore does not prevent appropriate development. However, the preferred option for the redevelopment of educational establishments will be retaining the sites for community uses.	Add in further information about proposed changes to schools
Communities and Renewal Partnership	16	PPO 32	Fully support the approach to safeguard education establishments and the playing fields. The LNRS Action Plans identify the need for additional school-based activities for children and young people so retaining playing fields is very important. In many of the Priority Neighbourhoods (especially Bevois & Bargate and Freemantle & Polygon where open space is scarce) the school playing fields are very important to local people to use outside school hours.	Welcome support	No change required
Mrs Jean Velecky	6	PPO 32	Query whether the city is safeguarding playing fields and what will happen when schools are amalgamated?	The Learning Futures process has identified changes to secondary school provision and providers for the proposed new schools. Detailed proposals are not available for the uses on the sites. However, there is national planning policy to protect playing fields and any proposals for their redevelopment must have strong justification.	Update information on Learning Futures and the use of school sites.
Highways Agency	8	5.3.42 (5.4.42 in error)	Where developments are likely to have significant transport implications, Transport Assessments should be prepared, including a Travel Plan (with targets, monitoring, incentives for compliance and a funding stream). Link to the latest draft version of government guidance on travel planning attached.	The Local Plan Review requires Transport Assessment to be completed for proposals likely to have significant transport implications (see Appendix 1). This approach will continue in the LDF.	No change required.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Southampton City Primary Care Trust	2	5.3.42 (5.4.42 in error)	<p>Objection - Enhancing access to health establishments is an important objective for SCPCT and although the trust advocates initiatives to encourage walking, cycling and bus travel, there are practical issues that restrict the viability of this vision both for staff and patients i.e. the time staff start or finish work or the nature of patients illness. Travel plans are in place to reduce the number of journeys made by car and are aimed at both employees and visitors but implementing travel plans for all health establishments may be unfeasible. A degree of flexibility is required in terms of travel plans for health establishments.</p> <p>Recommend separating the Access and Design of Health and Education Facilities. Education and health establishments are completely different public services in nature and scale and therefore have different access requirements. We therefore suggest that 'Access & Design of Health and Education Facilities' be replaced with 'Access & Design of Health Facilities', with a separate Education section.</p> <p>The 'Access & Design of Health Facilities' should read as follows: 5.4.42 Enhancing access to health establishments will be a priority with a presumption in favour of initiatives that encourage walking, cycling and bus travel <u>where appropriate</u>. Travel plans should be implemented <u>unless sound reasoning can be provided to justify how this would be impractical due to the nature of the establishment and associated staff restrictions such as working hours and the requirement to make patients visits and transport equipment as well as patient travel limitations due to their health condition</u>.</p>	<p>Increasing public transport use, walking and cycling can free up car parking space and promote a healthier environment, workforce and population. Travel Plans should be produced however they must be tailored to reflect the needs of the specific facility taking into account factors such as staff working hours and patients' poor health. Supporting text to be amended to reflect this.</p> <p>Accept need to separate Access and Design of Health and Education Facilities section</p>	<p>Amend text to separate Access and Design of Health and Education Facilities</p>
Southampton University Hospitals NHS Trust	3	5.3.42 (5.4.42 in error)	<p>The last sentence should be amended as follows: Travel Plans "that take account of the special needs of hospital patients" must be implemented by all establishments.</p> <p>The presumption in favour of initiatives that encourage walking, cycling and bus travel should make allowance that many of the patients travelling to Health care establishments are less able to use sustainable methods of transport than users of educational establishments. This policy as drafted is inappropriate when applied to Southampton General Hospital as a provider of specialist services in its role as a regional centre of excellence. Some of our patients travel long distances with very serious medical conditions.</p>	<p>Accept the particular needs of health care facilities and its regional role. Travel Plans should be produced; however they must be tailored to reflect the needs of the specific facility taking into account factors such as staff working hours and patients' poor health. Supporting text to be amended to reflect this.</p>	<p>Amend supporting text</p>

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of Southampton City Primary Care Trust	3	5.3.44 (5.4.44 in error)	Objection - The PCT aim is to 'make sure there are enough services for people within their area and that these services are accessible'. Along with this SCPCT encourages sustainable access to their health facilities, however the statement 'should provide planning contributions' is onerous and may not always be required for all sites. While good quality public realm and open space is important, enhancements of areas surrounding health establishments should be considered on a site by site basis. A standard requirement to make a financial contribution could bring into question the viability of improving or extending existing health establishments. We recommend that paragraph 5.4.44 should read as follows: <u>New developments on or around health facilities should ensure sustainable access to them and if necessary, provide suitable planning contributions to facilitate this.</u>	Development contributions may be required from all development in order to pay for infrastructure and services needs arising from the development. These will be assessed on a case by case basis.	No change required
Southampton University Hospitals NHS Trust	4	5.3.44 (5.4.44 in error)	This should acknowledge that Health Care is itself a Community Facility and health care developments are responding to increased demand resulting from new development and enhanced expectations. The location of services such as those provided at the General Hospital has been fixed historically. The cost of improving access to those health care services should be borne by the developments that result in the increased demand for health care and not by the health care developments that are responding to that demand. The cost of improving access to health facilities should be identified within the Health Impact Assessment of those larger developments and borne by those developments and not by the healthcare providers. Delete reference to health in this paragraph.	The Developer Contributions table in 7.1.4 lists the potential areas for contributions and measures depending on the nature of the development and the site. This table includes health facilities. One of the components of a high quality development is access and its provision should be incorporated in initial calculations on the viability of any development.	No change required

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 28 Overall approaches to the neighbourhoods – deleted**
 - **PPO 29 Sustainable communities in Southampton – deleted**
 - **PPO 30 Neighbourhood centre and Community Hubs – now CS 3 Town, district and local centres & community hubs**
 - **PPO 31 A healthy city – now CS 10**
 - **PPO 32 An educated city – now CS 11**
- **Policies and reasoned justification in chapter 4 ‘Spatial strategy and policies’**

Chapter 5.4 – Waterfront

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Savills on behalf of MDL Developments Ltd	1	5.4 Sustainability Appraisal Key Findings	Objection – Improved access also needs to be balanced with the many varied uses of waterfront land as well as the natural environment to accord with PPO33. Suggest change last sentence of the second sentence to read: “Such change will need to be cognisant of the many uses of waterfront land, and balance improved access with this and the protection of the natural environment.”	This section provided a short summary of the Sustainability Appraisal findings. The need for a mix of uses and appropriate redevelopment is stated within the text.	No change required.
Savills on behalf of MDL Developments Ltd	4	5.4.1	Support the sentence “significant areas of the city’s waterfront are utilised for marine based employment, in particular the international Port, where it is not appropriate for general public access due to health, safety and security issues.”	Welcome support	No change required.
Councillor Sarah Bogle	1	5.4.2	Support general principles of accessibility, balancing commercial needs etc. Suggest a firmer commitment to open up access and regenerate the Itchen waterfront around the listed American Wharf building, and the historic wharves in that area. Aspiration to make more of the maritime heritage of the city	Welcome support. The uses of specific sites will be considered in the City Centre Action Plan and Allocations DPD as it is too detailed for the Core Strategy.	No change required.
RSPB	13	5.4.3	Objection – The issues identified relate to linking the centre to the waterfront and improving public access. The RSPB is concerned that protection and enhancement of the internationally and nationally designated nature conservation sites has not been identified as a key issue. This omission is particularly concerning given that at paragraph 5.4.6 the Core Strategy highlights that the protection of the mudflats and inter-tidal habitats was raised as an issue during consultation on the Core Strategy Issues and Options DPD.	The importance of protecting and enhancing the natural environment was stated in 5.4.11 (Preferred Options Paper). A number of key issues could have been chosen; however these two reflect the results of consultation and other council priorities and documents.	No change required.
Turley Associates on behalf of the Pressmile Ltd	19	5.4.4	The waterfront area represents a location with huge potential for accommodating development as part of a regeneration and environmental improvement. The area is key for achieving tourism objectives and it also plays an important role in meeting development needs. It is noted that the section does not include a diagram. This is objected to and it is considered that such a figure should be provided, outlining the areas of potential and the key defining features.	Agree with the potential for waterfront development to meet tourism objectives and deliver improvements. However, the use of specific sites will be considered in the City Centre Action Plan and Allocations DPD, which will include detailed maps, as it is too detailed for the Core Strategy.	No change required.
Drivers Jonas on behalf of SEEDA	15	5.4.5	Supports – linkages from Woolston Riverside to the City Centre will have many benefits to Southampton and will assist in reconnecting with its waterfront and developing its maritime identity while increasingly accessibility and interest in Woolston. SEEDA also welcomes Woolston’s identification is a ‘Major Gateway’ but seeks to clarify what this means.	Welcome support The Major Gateway designation highlighted the importance of Woolston and the Itchen Bridge in bringing people into the City Centre. Following the results of the Gateways and Approaches study, this designation will be removed. The Proposed Submission version of the document will not include the Transport Preferred Options diagram.	Delete Gateway designations from the Proposed Submission Core Strategy diagrams except for those referred to in the Gateways and Approaches Study

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Chamber of Commerce	12	5.4.8	No mention is made about the public realm associated with the waterfront; the Boat Show or how Mayflower Park might have a changing role in the future; the delivery of Town Quay and Royal Pier; casinos; ice skating; conference facilities; a City Centre marina for visiting cruise yachts; or attracting world sailing events. The development of Royal Pier/Mayflower Park as a public project and regeneration site could progress a major waterfront amenity and secure the permanent home for the Boat Show.	Information for the use of specific sites such as Town Quay / Royal Pier will be contained in later more detailed documents including the City Centre Action Plan and Site Allocations DPD. The Core Strategy will set out policies including the general approach to the built environment and improving the quality of the public realm.	No change required.
Mrs A. D Crimble	1	5.4.8	Suggestion that there should be areas where people can fish, particularly deep water fishing and along the waterfront at Woolston	Note suggestion	No change required.
Nick Le Lean	1	5.4.8	We should capitalise on our maritime heritage and create an Ocean Centre jutting out into the sea like those found in other important ports such as Sydney and Vancouver (suggest the pier site). A place where the public can come to watch the ships move and the workings of the port be interpreted. There should be public access to the waterfront.	Welcome support for improving public access to the waterfront and note suggestions. Detailed proposals for the use of specific sites will be contained in later documents including the City Centre Action Plan and Site Allocations DPD.	No change required.
Alex Templeton	14	5.4.10	Request clarification of phrase "creating virtual links through branding" in this context. Suggest removing the phrase "...the provision of..."	Agree that this phrase is unclear. The Core Strategy will include a variety of measures to improve the links between the waterfront and other parts of the city, including the provision of infrastructure, information and other measures. Agree with suggestion to remove phrase	Rewrite section to clarify ways to improve links between the waterfront and other areas of the city.
Public Health, Southampton City Primary Care Trust	31	5.4.10	We agree that the development of the waterfront could positively impact on health.	Welcome support	No change required.
GOSE	10	5.4.11	Reference is made to undertaking Appropriate Assessment which will inform the submission stage. Have you considered your approach in the context of "Planning for the Protection of European Sites: Appropriate Assessment".	Yes, the Appropriate Assessment considered the approach set out in this document.	No change required.
Natural England	21	5.4.11	We agree with statements in 5.4.11 and look forward to working with SCC to find ways that this stance may be implemented.	Welcome support	No change required.
Drivers Jonas on behalf of SEEDA	9	PPO 33	Welcomes inclusion of this policy. SEEDA considers Woolston Riverside development proposal can help the City Council achieve its aim of allowing the city to reconnect with its waterfront, encouraging public access whilst recognising that there are environmental and business interests which need protecting. A balance can be achieved between the requirements of marine industries and other uses such as waterfront housing and retail. To encourage tourism and make the waterfront a destination it will be important to adopt a flexible approach to uses such as hotel and A3/4 uses and to ensure that the waterfront is vibrant, safe and accessible though a variety of transport modes, both public and private.	The policy controlling edge / out of centre retail / hotel development has been adjusted to incorporate regeneration considerations.	No change required.
Environment Agency	12	PPO 33	There is little reference to the implications of the Port activity and expansion on the environment. In maintaining and improving port facilities, any encroachment into tidal rivers and estuaries must take into account the effects on protected habitat, water quality and public access to the water.	We will continue to work with the Port in order to reduce the negative impacts of port activity and growth. However, planning has only limited scope to restrict or affect port activities. A new policy will be added on the Port and its sustainable growth	Add in new Port policy

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	24	PPO 33	Waterfront developments should provide an adequate buffer of public land to create a sense of space within any waterfront development where the public can enjoy a connection to the natural environment. These could be used for street art and bring communities together whilst managing the impact on designated sites, nature conservation interest and addressing flood risk issues.	Agree with the importance of creating a high quality environment in waterfront redevelopment. The most suitable uses will vary between sites; the Site Allocations DPD and City Centre Action Plan will consider the specific uses appropriate at a site level.	No change required.
Mrs Jean Velecky	7	PPO 33	A big opportunity for waterfront access was lost when Ocean village was developed and must not be repeated with Woolston. Weston Shore could be improved and linked with the Woolston development. Mayflower Park must be valued and protected from exploitation and damage by the Boat Show.	Note concerns on the Woolston redevelopment and on Mayflower Park. Any proposals for waterfront development must be of high quality design and demonstrate how access to the waterfront will be maintained and improved.	No change required.
Natural England	20	PPO 33	Natural England will comment further on option 33 in response to the SEA/SA and Habitat Regulations assessment. We would suggest that this option is not taken forward until the outcome of any pending Appropriate Assessment. We would expect the protection and enhancement of the designated sites and their interest features made a priority aim/issue for this chapter of policies in keeping with the legislation and national policy.	Appropriate Assessment has been undertaken on the policies in the Core Strategy; detailed proposals will be assessed when planning applications are submitted or through the AA on the City Centre or Allocations DPD.	No change required.
RSPB	14	PPO 33	Objection - The RSPB welcomes the inclusion in Preferred Option 33 the acknowledgement that the proposed Waterfront development must not adversely affect nature conservation interests. Preferred Policy Option 33 does not however acknowledge that any development proposals for the waterfront would be subject to the completion of a Flood Risk Assessment.	Note concern about flood risk. The Local Plan Review requires an appropriate Flood Risk Assessment to be undertaken in areas at risk of flooding. This will be continued in the LDF as it is a requirement in PPS25. A new policy will be added on flooding	Add in policy on flooding
Savills on behalf of MDL Developments Ltd	8	PPO 33	Support the Preferred Policy Option	Welcome support	No change required.
SEEDA	3	PPO 33	I understand that residential development may not go ahead on the Waterfront. If this is the case will this and its implications need to be reflected in the plan?	Appropriate development on the waterfront will depend on the flood risk in the area concerned and the defences in place to prevent this and the nature conservation designations. More information on flood risk will be included in the SFRA which will be submitted at the same time as the Core Strategy.	No change required.
Turley Associates on behalf of the Pressmile Ltd	20	PPO 33	The emphasis on promoting accessibility is supported but it is felt that the strategy has missed the opportunity to recognise the locations and overall level of development that could be accommodated. Locations such as Woolston and Willments have considerable potential and other locations such Drivers Wharf will also come forward for redevelopment within the life time of the plan. These should be recognised and included within the strategy for the waterfront and the wider Core Strategy.	Welcome support. The uses of specific sites including sites on the waterfront will be considered in the Allocations DPD as it is too detailed for the Core Strategy.	No change required.

Major / additional changes in Proposed Submission Core Strategy:

- Policy changes;
 - PPO 33 Accessible and positive waterfront – now CS 12 Accessible and attractive waterfront

Chapter 5.5 – Open Space Network

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Public Health, Southampton City Primary Care Trust	32	5.5.1	We strongly support this section and feel that the importance of open space has been well explained.	Welcome support	No change required
GOSE	28	5.5.3	Reference is made to a shortage of open space. It is not clear that PPG17 (paragraph 8) has been taken into account which refers to redressing quantitative and qualitative deficiencies through the planning process.	The saved policies in the Local Plan Review include a policy on providing additional open space. This will apply until replaced by the forthcoming Development Control and Allocations DPDs. However, agree that this Core Strategy policy should include reference to retain and, if possible, increasing the quantity of open space.	Add in reference to the quantity of open space
Mrs Jean Velecky	8	5.5.3	The acknowledged shortage of open space against national standards will become more acute if housing development is allowed with no compensating increase in open space.	Agree	No change required
The Environment Centre	25	5.5.7	Supporting - Roof gardens should be supported by the Core Strategy as important areas for biodiversity and CO2 and H2O sinks in addition to enhancing local quality of life.	Welcome support	No change required
Environment Agency	25	5.5.9	Open spaces should be developed in conjunction with access routes, green infrastructure routes, cycle tracks, pedestrian walkways and river restoration sites. We would encourage an integrated approach to Open Space.	Agree. Accessibility is an important issue. The Green Space Strategy will consider all the issues relating to open space including maintenance, management and funding. Although there will be some open spaces where it is not appropriate to promote cycle routes, the Core Strategy seeks to improve and extend the open space network.	No change required
Natural England	22	5.5.9	This is one of Natural England's key strategic initiatives and we will provide any assistance necessary to SCC to achieve this, in particular with regards to health and biodiversity. An indication of the importance of these policies is evident in the number of spatial objectives Open Space helps deliver.	Welcome support	No change required
Bovis Homes	8	PPO 34	The Council is right to seek to improve the quality of existing open space. In so doing, it will need to take some difficult decisions in order to ensure the provision of publicly-accessible open space and recreational facilities that may well require negotiating with landowners to achieve the provision of such facilities and being prepared to pay the requisite price to achieve this. The Council's stance to date in respect of the Former Civil Service Sports Field suggests that it is not willing to do this. The Company therefore objects to this inflexibility.	Note concerns over the implementation of policies. The policies in the Core Strategy will form the key principles for development in the city and their successful implementation will require commitments from both the public and private sector.	Amend Proposed Submission Core Strategy to include appropriate reference to City Council funding.
Eastleigh Borough Council	6	PPO 34	Object to the lack of reference in the open space policies, to the Rural Urban Fringe, which is identified on the Key Diagram as being mostly outside the city boundary.	Agree that this policy and the key diagram do not tie up. Following further consideration on the land involved, reference to the rural urban fringe has been deleted. This is due to the overlap with policies safeguarding strategic gaps and designated sites and the need to retain flexibility to deliver transport and employment schemes.	Amend policy and key diagram

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	26	PPO 34	Should link open spaces to promote a sustainable network that can be used as green corridors, cycle routes and alternative transport links. This could be done through a joint strategy with Southampton City Council and the Environment Agency.	Agree. Accessibility is an important issue. Although there will be some open spaces where it is not appropriate to promote cycle routes, the Core Strategy seeks to improve and extend the open space network. Welcome suggestion to work together with the Environment Agency.	No change required
GOSE	29	PPO 34	Reference is made to retaining strategic gaps. Has consideration been given to the advice in PPS7 (paragraphs 24 and 25). Criteria based policies should provide sufficient protection without the need for rigid local designations which may restrict acceptable development. Only if criteria based policies cannot provide the necessary protection should local designations be used.	This policy seeks to prevent coalescence of settlements and loss of countryside and open space. The gaps shown on the Key Diagram do not include designated sites which are already safeguarded.	No change required
Hound Parish Council	2	PPO 34	Support for maintaining the strategic gaps	Welcome support	No change required
Natural England	23	PPO 34	This option could have a more direct link to objective SO15 with adequate rewording or an additional point.	The detail of how the city's biodiversity and nature conservation opportunities will be maximised will be an important issue for later DPDs including revised development control policies. The Core Strategy will set out the framework for this approach. Please note the open space and natural environment policies will be restructured in the Proposed Submission version with a policy on protecting and enhancing open space (now CS 21) and another on Promoting biodiversity and protecting habitats (now CS 22).	Combine PPO34 and PPO36 into one policy.
New Forest District Council	9	PPO 34	While these policy options are supported, the Core Strategy should ensure that so far as is possible open space and recreational opportunities are provided in a way that will minimise additional recreational pressures arising from the housing growth proposed (16,300 additional homes 2006-2026) on the nearby sensitive parts of the New Forest. Suggest that this consideration should be added to the criteria listed in Preferred Policy Option 34.	Welcome support for policy Whilst we recognise that the New Forest will attract Southampton residents, the Core Strategy and the draft Green Space Strategy seek to improve and support the open spaces within the city to reduce this.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
RSPB	15	PPO 34	<p>Objection - The RSPB welcomes the positive approach that Southampton City Council are taking in respect of open space, supports the principle of improving the quality of open spaces and welcomes the acknowledgement of the need to improve biodiversity. However the RSPB do not consider that this has been effectively translated into policy. Preferred Policy Option 34 seeks to “improve the quality of existing open space”, but does not acknowledge the need to improve biodiversity. PPO 34 could therefore be improved by including a criterion seeking to improve biodiversity. Furthermore, the appropriate assessment of the South East Plan identifies open space creation and enhancement as a key mitigation measure to offset increased recreational disturbance on Natura 2000 sites, arising from continuing population increases around these sites. The Solent and Southampton Water SPA and Ramsar Site is identified in the appropriate assessment as one of the sites in the region in greatest need of mitigation from the effects of new housing development, as it is already considered to be subject to levels of recreational pressure that affect site integrity. Therefore, open spaces within the City will play an increasingly significant part in reducing recreational pressure on the sensitive estuarine areas, which will of course need to be carefully balanced with biodiversity interests. Such measures will require thorough consideration in the appropriate assessment of the Southampton City LDF.</p>	See response to Natural England on this issue, above.	Combine PPO34 and PPO36 into one policy.
Savills on behalf of Wilky Property Holdings plc	3	PPO 34	<p>The respondent objects to point (e) on PPO34. This overall approach should conform fully with the findings of the City Local Plan Review, including those areas deleted from the Strategic Gap during the Local Plan Review. It is not appropriate to simply reinstate any areas of strategic gap through this LDF process as previously excluded by the Local Plan Review and reflected in the stance adopted by the Inspector at the Test Valley Local Plan Review.</p> <p>It is concerning that vast swathes of land are apparently designated as Rural-Urban Fringe, and it is hoped that this will be better designated in the Submission Stage, backed up by credible and up to date evidence, or removed altogether. It is the view of the respondent that the motorway forms the necessary break to development.</p> <p>Suggested change - Delete the Rural–Urban Fringe designation or at least designate clearly what land is affected and provide a robust up to date evidence base for such designations.</p>	<p>This policy applied the draft South East Plan designations to Southampton and sought to prevent coalescence of settlements and loss of countryside and open space.</p> <p>Following further consideration on the land involved and proposed changes to the South East Plan policy, reference to the rural urban fringe has been deleted. This is due to the overlap with policies safeguarding strategic gaps and designated sites and the need to retain flexibility to deliver transport and employment schemes.</p>	Amend policy and key diagram

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	11	PPO 34	Objection - Improvements to the quality of existing space should not be at the detriment of biodiversity. There should be a commitment to conserve all current areas of public space and not the introduction of a hierarchical order that may specify inadvertently those that are lost.	Agree that biodiversity must be maintained. The hierarchy of open spaces in the Core Strategy and Green Space Strategy will be a way of ensuring that spaces include the facilities required to meet their role i.e. as a regional and local open space, not to specify the priority given to spaces. Please note the open space and natural environment policies will be restructured in the Proposed Submission version with a policy on protecting and enhancing open space (now CS 21) and another on Promoting biodiversity and protecting habitats (now CS 22).	Amend policy
Test Valley Borough Council	2	PPO 34	Request that the Core Strategy makes clear that there will be a need for joint working to discuss any needs for additional recreation and leisure facilities beyond the city boundary from the proposed growth of Southampton. Welcome the support given to retaining the strategic gaps around Southampton	Welcome support for retaining strategic gaps. Welcome joint working to address recreation and leisure facilities outside the city boundary. The need for joint working will be made clear throughout the strategy.	Ensure need for joint working is made clear in the document
Turley Associates on behalf of the Trustees of the Barker Mill Estate	3	PPO 34	The urban fringe should be viewed in an appropriate context, with a policy that reflects the ability of the edges of settlements to accommodate development and the way in which development can be used to deliver strong and defensible boundaries.	This policy applied the draft South East Plan designations to Southampton and sought to prevent coalescence of settlements and loss of countryside and open space. Following further consideration on the land involved and proposed changes to the South East Plan policy, reference to the rural urban fringe has been deleted. This is due to the overlap with policies safeguarding strategic gaps and designated sites and the need to retain flexibility to deliver transport and employment schemes.	No change required
Bovis Homes	9	PPO 35	A policy setting out open space standards is to be welcomed. The Council must nevertheless be willing to negotiate in a realistic manner with landowners in order to achieve them. The ability of a landowner to provide publicly-accessible open space in a location where it is needed is rare. The Council should therefore work to achieve a reasonable level of provision and be prepared to negotiate, even if this does necessitate an element of development. A more flexible approach is thus requested.	Open Space Standards will now be included in the Development Control DPD. Local Plan Review standards will apply until this DPD is adopted. Note concerns over the implementation of policies. The policies in the Core Strategy will form the key principles for development in the city and their successful implementation will require commitments from both the public and private sector.	Policy on Open Space Standards will now be in a later DPD
Environment Agency	28	PPO 35	Policy should consider wildlife/river corridor forms of open space by opening up culverted watercourses, assisting communities to develop a sense of place and pride in their local area whilst enhancing biodiversity and potentially reducing flood risk.	Welcome suggestions to improve open space provision. The Core Strategy seeks to improve and support the open spaces within the city. Open Space Standards will now be included in the Development Control DPD. Detailed proposals will be considered in later DPDs.	Policy on Open Space Standards will now be in a later DPD
Forestry Commission	2	PPO 35	The LDF should adopt standards for the provision of Green Infrastructure to meet English Nature's Accessible Natural Greenspace Standard (ANGST) and the Woodland Trust Woodland Access Standard.	Open Space Standards will now be included in the Development Control DPD. Local Plan Review standards will apply until this DPD is adopted.	Policy on Open Space Standards will now be in a later DPD

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
GVA Grimley on behalf of Development Securities Plc	15	PPO 35	Recognise the importance of open space and support the aim to ensure adequate provision. We seek recognition that on site provision of open space in new developments may not always be appropriate for example in city centre developments.	Welcome support and confirm that open space requirements will be site specific. Open Space Standards will now be included in the Development Control DPD.	Policy on Open Space Standards will now be in a later DPD
New Forest District Council	10	PPO 35	While these policy options are supported, the Core Strategy should ensure that so far as is possible open space and recreational opportunities are provided in a way that will minimise additional recreational pressures arising from the housing growth proposed (16,300 additional homes 2006-2026) on the nearby sensitive parts of the New Forest. Suggest that this should be taken into account in the development of standards in response to Preferred Policy Option 35.	Welcome support for policy Whilst we recognise that the New Forest will attract Southampton residents, the Core Strategy and the draft Green Space Strategy seek to improve and support the open spaces within the city to reduce this.	Policy on Open Space Standards will now be in a later DPD
New Forest National Park Authority	5	PPO 35	Supporting – The New Forest Park Authority considers appropriate green infrastructure provision and enhancement to be critical in planning future development. The Appropriate Assessment has highlighted the need to provide alternative recreational areas to the protected landscapes and habitats that lie in close proximity to the City of Southampton. The Authority supports the intention to develop an open space provision policy in accordance with PPG17 and considers this to be necessary before the Core Strategy is considered at Examination. A policy setting out the open space provision standards in Southampton is an important component of the Core Strategy, As is outlined in 5.5.3; this should incorporate the findings and conclusions of the emerging Parks and Green Spaces Strategy.	Welcome support. Open Space Standards will now be included in the Development Control DPD. Local Plan Review standards will apply until this DPD is adopted.	Policy on Open Space Standards will now be in a later DPD
Eastleigh Borough Council	3	PPO 36	Support the emphasis placed on improving the 'green grid';	Welcome support	No change required
Environment Agency	27	PPO 36	Should link open spaces to promote a sustainable network that can be used as green corridors, cycle routes and alternative transport links. This could be done through a joint strategy with Southampton City Council and the Environment Agency.	Agree. Accessibility is an important issue. Although there will be some open spaces where it is not appropriate to promote cycle routes, the Core Strategy seeks to improve and extend the open space network.	No change required
New Forest District Council	11	PPO 36	While these policy options are supported, the Core Strategy should ensure that so far as is possible open space and recreational opportunities are provided in a way that will minimise additional recreational pressures arising from the housing growth proposed (16,300 additional homes 2006-2026) on the nearby sensitive parts of the New Forest. Suggest that this should be taken into account in the detailed proposals for extending the green grid under Preferred Policy Option 36.	Welcome support for policy Whilst we recognise that the New Forest will attract Southampton residents, the Core Strategy and draft Green Spaces Strategy seek to improve and support the open spaces within the city to reduce this. The Core Strategy will set out key principles for development; later documents will consider more detailed issues and proposals such as these.	No change required
Environment Agency	9	PPO - Omission	Policy is required to improve the quality of existing 'green' sites and improve the capacity to adapt to climate change by restoring natural processes. Investment is required to mitigate development pressures and reduce fragmentation to mitigate climate change impacts. Suggests adding in the following policy:	Some of the detailed policy components suggested are contained within other policies i.e. promoting biodiversity and delivering different types of green space. A Green Infrastructure study has been undertaken in South Hampshire to address the wider issues raised including networks of green space and access to	Include reference to the Green Infrastructure study with reference to extending the green grid.

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
			<p><u>Green infrastructure</u> <i>Green infrastructure will be identified, developed and implemented in the region to:</i> <i>- Ensure that a healthy and enhanced environment is provided for the benefit of present and future communities, promote biodiversity, and to contribute to economic objectives. Therefore this plan should:</i> <i>1. Provide connected and substantial networks of accessible multi-functional green space, in urban, urban fringe and adjacent countryside areas to service new development.</i> <i>2. Have a multiple hierarchy of provision of green infrastructure, in terms of location, function, size and levels of use at every spatial scale.</i> <i>Provide and safeguard green infrastructure based on the analysis of existing natural, historic, cultural and landscape assets, provided by characterisation assessments and the identification of new assets required to deliver green infrastructure.</i> <i>3. Identify biodiversity conservation areas and biodiversity enhancement areas, to deliver large-scale habitat enhancement for the benefit of wildlife and people.</i> <i>4. Set targets for the provision for natural green space within development areas.</i></p>	<p>them. This will be referenced in the Core Strategy. However, it is not possible within the Core Strategy to include policies for outside Southampton as proposed.</p>	

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 34 General approach to open space – now CS 21 Protecting and enhancing open space (and incorporating PPO 36)**
 - **PPO 35 Open Space standards – deleted**
 - **PPO 36 Extending the Green Grid – now incorporated into CS 21**
- **Policies and reasoned justification in chapter 5 ‘Key requirements for successful development’**

Chapter 6 – Key Diagram

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Eastleigh Borough Council	8	6.1.1 Key Diagram	It is requested that the Park and Ride designation be moved westwards, as its current location could be interpreted as being linked to Southampton International Airport.	Noted. The spatial diagram is just that, a general expression and not geographically specific. The Proposals Map will be updated to reflect the site specific allocation in due course. However, the notation for the park & ride site on the Key Diagram for the Proposed Submission Document will be amended.	Amend the location for the park and ride site, to the north of the city, on the Key Diagram Key diagram has been amended to show this.
GOSE	2	6.1.1 Key Diagram	We note the key diagram, which sets out the broad locations for uses such as housing. Have you considered whether you have shown all the proposed broad locations and all the other strategic requirements (PPS12, paragraph 2.13)?	Yes. The Key Diagram shows the broad locations for housing and the direction of city centre growth. The Proposed Submission version will also include gateway locations and the potential extent of the green grid. The Proposals Map will be updated to reflect the site specific allocations in due course.	Amend key diagram to include expansion of the green grid and gateways. Key diagram has been amended to show this.
GVA Grimley on behalf of Development Securities Plc	16	6.1.1 Key Diagram	Seek clarification that the whole of the City Centre area falls within the indicative higher residential densities designation. The area of focus for retail, office and leisure is unclear and should be increased to meet the boundary to the west and incorporate West Quay III.	The City Centre chapter states that the city centre will be a focus for residential uses. The spatial diagram is a general expression of the strategy and not geographically specific. The Proposals Map will be updated to reflect the site specific allocations in due course.	Ensure that it is clear that higher residential densities are appropriate in the whole of the City Centre.
Highways Agency	10	6.1.1 Key Diagram	In accordance with PPG13, Park and Ride sites should be located where they can intercept existing traffic and not where they would generate additional trips. A transport impact assessment would also be required for such sites and we would also expect to see a reduction in town centre parking. The HA is concerned about the location of the Park and Ride site close to the M27 Junction 5, and we would wish to discuss this further before further development of this and other DPDs.	Agreed. The three sites would intercept traffic following from the west, north and east along the M27 / M3 corridors. The northern site would be located either south of junction 5 or north as part of the Airport Parkway Station. The junction already deals with traffic for the Airport and the City and as such a site could 'capture' this and transfer traffic onto more sustainable bus routes thus enhancing air quality in the City.	No change required.
Natural England	24	6.1.1 Key Diagram	This is fairly over simplified and would be better if it referred back to the particular preferred option that the actions/symbols on the map related to.	Agree the need to cross refer between the policies and the Key Diagram, however it is a general expression of the strategy and not geographically specific. The Proposals Map will be updated to reflect the site specific allocation in due course.	Add in references to policies within key
RSPB	8	6.1.1 Key Diagram	Objection - The RSPB commends Southampton City Council for their recognition of the complex range of issues affecting biodiversity within the city in section 4.4. These issues are effectively addressed through Preferred Policy Option 7 and 8 which provide a robust framework against which the impact of development proposals on biodiversity can be considered. The RSPB is however concerned that the Key Diagram does not identify any of the international, national or local designated sites that are protected under Preferred Policy Option 7. It is therefore suggested that the Key Diagram be amended to identify the location of	The Key Diagram is a general expression of the strategy and not geographically specific. The Proposals Map shows wildlife designations and will be updated to reflect the site specific allocations such as important areas for habitat restoration/re-creation in due course. We welcome the offer to work together on identifying areas.	No change required.

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
			designated sites, including SPAs, SSSIs and SINCs. This is in accordance with paragraph 5 PPS 9. In addition, Local Development Frameworks should identify important areas for habitat restoration/re-creation, by means of appropriate policies and maps. The RSPB is currently mapping wetland restoration areas which could be used to fulfil this requirement. We would be happy to discuss the use of this work with Southampton City Council. Paragraph 5 of PPS9 states: "Local development frameworks should: (i) indicate the location of designated sites for importance for biodiversity and geodiversity, making clear distinctions between the hierarchy of international, national, regional and local designated sites; (ii) and identify areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies." It is therefore suggested that the Key Diagram be amended to identify the location of designated sites, including SPAs, SSSIs and SINCs. This is in accordance with paragraph 5 PPS 9.		
Savills on behalf of Wilky Property Holdings plc	4	6.1.1 Key Diagram	This overall approach should conform fully with the findings of the City Local Plan Review, including those areas deleted from the Strategic Gap during the Local Plan Review. It is also concerning that vast swathes of land are apparently designated as Rural-Urban Fringe, and it is hoped that this will be better designated in the Submission Stage or removed altogether. It is the view of the respondent that the motorway forms the necessary break to development. Suggested change - Delete the Rural-Urban Fringe designation or at least designate clearly what land is affected and provide a robust up to date evidence base for such designations.	The three gaps identified in the Core Strategy were both assessed by the Local Plan Inspector and are in the South East Plan submitted to Government. The Proposed Submission Key Diagram will include more information on the Urban Rural designation.	Add in further information on the Urban-Rural Fringe designation.
Turley Associates on behalf of the Pressmile Ltd	21	6.1.1 Key Diagram	The key diagram appears overly complex and confusing. It seeks to display too much information and as such, its purpose is lost. The diagram should be simplified and include a clearer reference to the four key areas (city centre, neighbourhoods, open space and the waterfront) and to the major redevelopment areas. Beyond this, details such as density areas, rail tunnel widening etc should be left to the more detailed diagrams set out in the Core Strategy itself. National advice should be used to guide the density of development, not a specific policy or the key diagram.	Note comments. The Key Diagram will be amended for Proposed Submission and will be supported by other diagrams with the neighbourhoods diagram amended and retained. It is not possible to clearly show the different key areas due to the overlap between them for example with the city centre including neighbourhoods, open space and waterfront areas.	Amend Key Diagram and supporting diagrams to make them clearer.

Chapter 7 – Implementation, Delivery and Monitoring

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Environment Agency	29	7.1.2	Add in text on brownfield remediation, for example the need to maintain any remedial measures on the development over the long term. We are concerned about the lack of mention of surface or groundwater quality.	The redevelopment of brownfield sites will generate detailed queries about site remediation. These will be addressed in later more detailed documents.	No change required
Natural England	25	7.1.2	All four of the implementation strategies have resource implications for Southampton City Council. We look forward to seeing how developer contributions will be controlled and delivery monitored. In other LDF core strategies the authority have listed which policies will be monitored and which figures/indicators will be used to test the success of the policies, we would advise that SCC do the same.	Agree. Proposed Submission version will include table of indicators, targets and responsible agencies / organisations.	Include more information on monitoring policies
Central Neighbourhoods Partnership and Health & Well Being Partnership	8	PPO 37	Section 106 money should be used for the relevant area. Consult with local community as to what the money should be spent on. Be consistent.	Agree that money should be spent within the local area. However, there are set guidelines on section 106 monies which require contributions to be directly related to the development, necessary and reasonable.	No change required
Chamber of Commerce	13	PPO 37	Comments provided on the Planning Gain Supplement (including principles of lower charges for regeneration sites and small-scale development and request for further clarity on how it would interact with existing planning obligations and relate to local sites and priorities). This must support public spending not replace it as too great a tax on planning consent will stop development and therefore the regional growth target of 3.5% will be missed.	Note comments on the Planning Gain Supplement and the potential effect on slowing development. This will be taken into account in the SPD on developer contributions to be prepared once further government guidance has been issued.	No change required
Communities and Renewal Partnership	17	PPO 37	Welcome PPO 37 which broadens the concept of developer contributions to include non – physical aspects. Improvements to residents' quality of life come from both physical improvements and facilities and improved services. We cannot assume that the public services will have sufficient revenue to run new programmes from new facilities, or to run programmes from existing facilities for new residents.	Welcome support	No change required
Forestry Commission	3	PPO 37	Funding should be secured for the provision and continuing management of green infrastructure.	Agree. The Core Strategy specifically mentions open space and natural environment contributions.	No change required
GVA Grimley on behalf of Development Securities Plc	17	PPO 37	Seek confirmation that developer contributions will be set out in accordance with Circular 05/05 and be reasonable and justifiable in planning terms.	Yes, contributions will be sought in accordance with government guidance in Circular 05/05 or its replacement in future	No change required
Highways Agency	16	PPO 37	It is vital that development does not take place at a faster rate than the provision of any related infrastructure requirements, as this could lead to impact occurring on the trunk road network and would conflict with PPG13.	Agree with the need to co-ordinate development and infrastructure	No change required
Southampton University Hospitals NHS Trust	5	PPO 37	Health Care is an essential service required to meet the needs of developments, in particular residential development. Appropriate contributions should be sought to ensure health facilities are available at the appropriate time.	Agree with the need to promote health and for appropriate contributions to health facilities. This is specifically mentioned in the Core Strategy.	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Southern Water Services	8	PPO 37	Support the principle expressed in PPO37 that development will only be permitted if the necessary infrastructure, including water supply and sewerage is available or will be provided at the appropriate time to serve the development. However our support must be qualified by our separate objection which reflects that the Core Strategy contains no policies that facilitate or enable infrastructure provision.	Welcome support. Agree that additional policy text is required to facilitate infrastructure.	Add in policy text on infrastructure
Theatres Trust	7	PPO 37	It is important that the need for developer contributions for cultural activities is identified and a fuller explanation will be given in the SPD. Recommend 'Securing Community Benefits through the Planning Process' available at PlanningResource.co.uk	Note reference. There will be a range of areas for which it may be appropriate to seek developer contributions, depending on the site and its uses. The policy aims to be sufficiently flexible to address this.	Ensure policy delivers local benefits and is in line with government guidance
Communities and Renewal Partnership	18	7.1.4	To give more flexibility in agreeing developer Contributions consideration should be given to extending the areas of contribution set out in the table so that the fourth and sixth lines read as follows (or something similar): - Provision or improvements to open space and leisure facilities <u>and programmes</u> . - Community, Health and / or education facilities <u>and programmes</u> including Community Hubs	Agree that money should be spent within the local area. However, there are set guidelines on section 106 monies which require contributions to be directly related to the development, necessary and reasonable. The detailed issues will be addressed in a SPD following a decision by government on the future direction of section 106 contributions.	No change required
Environment Agency	30	7.1.4	Developer contributions should contribute to all forms of infrastructure and suggest expanding this to recognise others such as river infrastructure, green corridors, alternate transport routes such as cycle and pedestrian trails and flood infrastructure.	Agree that developer contributions could be used for the case proposed.	No change required
SEERA	7	7.1.4	It would be helpful in the submission document if the range of infrastructure listed and defined reflects the definition of infrastructure set out within paragraph 3.5.5, Figure 2 of the revised draft South East Plan Implementation Plan, as approved by the Assembly's Regional Planning and Executive Committees.	Agree importance of linking Core Strategy with regional planning guidance and specifically the SEEDA Implementation Plan. However do not consider that it is necessary to include all the items listed in the Implementation Plan. More details will be set out in relation to specific policies in the Proposed Submission document. Fuller details will be included in a revised SPD on developer contributions.	No change required
Southampton University Hospitals NHS Trust	6	7.1.4	Should be amended to include "and health facilities". The "Area for Contribution/Measure should include health facilities. The importance of improved health care facilities and access to them is outlined in Policy Option 31 with the requirement for larger developments to produce HIAs. There is no point in an HIA identifying the effect of that development on health and how it relates to health care provision if it does not have to contribute to rectify any shortcomings.	The table currently highlights 'Community, health and/or education facilities' as an area for contribution / measures	No change required

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Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Atis Real on behalf of Ordnance Survey	2	7.1.5	Objection – this is considered completely unworkable and inappropriate because; there can be no presumption of commercial viability until full details of the proposed development are available for assessments; a development proposal arises when a planning application is submitted and the commercial market will not evolve to reflect the development plan if, as a result, there should be no commercial viability. There is no need for this passage to be included as a development proposal will not arise unless there is a prospect of commercial viability and Circular 05/05 sets out the test which must be applied which includes a recognition of economic viability. Suggest deleting 7.1.5	Agree that development will not proceed if it is not viable and therefore paragraphs 7.1.5 – 7.1.7 are unnecessary.	Delete paragraph
Scott Brownrigg on behalf of Kier Property	2	7.1.5	Objection - the LDF states that as developers have been fully engaged in the development plan process then it follows that the allocations will be commercially viable and that there will be limited occasions when this presumption will need to be reconsidered. Even after the provision of a full financial appraisal the LDF states that there could be circumstances where the City Council agrees that an allocation is not commercially viable but that 'it is better for the development not to proceed than for it to be delivered contrary to the development plan'. In my view, it is ludicrous if it is demonstrated that an allocation is commercially unviable that the Council would still stick rigidly to its development plan. I would like to see the implementation of the plan being a little more responsive to the economic, environmental and social needs of the City.	Agree that development will not proceed if it is not viable and therefore paragraphs 7.1.5 – 7.1.7 are unnecessary.	Delete paragraph
Atis Real on behalf of Ordnance Survey	3	7.1.6	Objection – the commercial market will not evolve to reflect the development plan if, as a result, there should be no commercial viability. There is no need for this passage to be included as a development proposal will not arise unless there is a prospect of commercial viability and Circular 05/05 sets out the test which must be applied which includes a recognition of economic viability. Suggest deleting 7.1.6	Agree that development will not proceed if it is not viable and therefore paragraphs 7.1.5 – 7.1.7 are unnecessary.	Delete paragraph
Atis Real on behalf of Ordnance Survey	4	7.1.7	Objection – this is considered completely unworkable and inappropriate because; there can be no presumption of commercial viability until full details of the proposed development are available for assessments; a development proposal arises when a planning application is submitted and the commercial market will not evolve to reflect the development plan if, as a result, there should be no commercial viability. There is no need for this passage to be included as a development proposal will not arise unless there is a prospect of commercial viability and Circular 05/05 sets out the test which must be applied which includes a recognition of economic viability. Suggest deleting 7.1.5 – 7.1.7 inclusive in their entirety.	Agree that development will not proceed if it is not viable and therefore paragraphs 7.1.5 – 7.1.7 are unnecessary.	Delete paragraph

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
The Environment Centre	26	7.1.7	Objection (part a.) – Change to include a full SD appraisal in addition to financial.	The importance of sustainable development is shown throughout the Core Strategy. As development will not proceed if it is not viable, paragraphs 7.1.5 – 7.1.7 are unnecessary and will be deleted.	Delete paragraph
GOSE	4	7.1.10	PPS12 (paragraph 2.2) states that the strategy and associated policies should be expressed in terms which emphasis the means and timescale by which the objectives derived from the spatial vision will be met. It is suggested that this point is further considered. Do you consider there to be a clear monitoring framework that will give early warning of problems in time for planned contingencies to be triggered? The monitoring framework does not appear to have identified the key steps for delivery of major proposals.	It is recognised that monitoring is a key part of the Core Strategy and the successful implementation of its policies. The Proposed Submission version will develop the monitoring information and include a delivery plan. An updated housing trajectory will also be included.	Add in monitoring framework and delivery plan Update housing trajectory
Southern Water Services	9	PPO - omission	Objection - although PPO 37 aims to <i>prevent development</i> until infrastructure is available no policy supports or facilitates <i>infrastructure delivery</i> . Policies in the Core Strategy should support and facilitate the delivery of this essential infrastructure in accordance with PPS1. The Core Strategy should include a policy on the provision of infrastructure, including water supply, sewerage and wastewater treatment infrastructure. The delivery of infrastructure, including water, sewerage and wastewater treatment services has not been identified as a policy issue in the Core Strategy Preferred Options and this is a significant omission in the light of the major investment that will be required to meet the additional demands from new development. Suggested wording: <u>Provision of water supply, sewerage and wastewater treatment infrastructure:</u> New and improved water supply sewerage and wastewater treatment infrastructure will be encouraged and permitted in order to meet the identified needs of the community. New development will be permitted only if sufficient water supply, sewerage and wastewater treatment capacity is either available, or can be provided in time to serve it. (Move from Preferred Policy Option 37)	Agree	Add in policy text relating to infrastructure proposals.

Major / additional changes in Proposed Submission Core Strategy:

- **Policy changes;**
 - **PPO 37 Developer Contributions - now CS 25 The delivery of infrastructure and developer contributions and new policy text on enabling infrastructure**
- **Policies and reasoned justification in chapter 5 ‘Key requirements for successful development’**

Appendices

Organisation / Individual	Point No.	Para/PPO etc	Comment	Officer response	Recommendation
Theatres Trust, Rose Freeman	5	Appendix-Omission	Suggest the addition of a glossary in an appendix with an explanation of 'community facilities'.	A glossary will be included in the Proposed Submission document	Include Glossary in Proposed Submission Core Strategy
Drivers Jonas on behalf of SEEDA	17	Appendix 2	Note detailed standards; however SEEDA considers that parking standards should be flexible and provide for a variety of types of development and have regard to site specific considerations. Given the already restrictive current standards, these restrictions should not be further increased.	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. This has been delayed and standards will now be set out in an SPD. Flexibility will be provided in the Proposed Submission policy within the constraints of maximum standards, PTAL and government guidance.	Include standards within separate SPD Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria.
Savills on behalf of Linden Homes	2	Appendix 2	Objection - Whilst the level of 1 to 2 bed units is supported, there is concern though that the level of parking for 3 bed units should be the same as 4 bed units or both should be increased in order to assist the provision of family housing rather than flats. Suggest - 3 bed units should be permitted 1.5-2 spaces per unit and 4+ bed units permitted 2-3 spaces per unit	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. This has been delayed and standards will now be set out in an SPD. Flexibility will be provided in the Proposed Submission policy within the constraints of maximum standards, PTAL and government guidance.	Include standards within separate SPD Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria.
The Planning Bureau Ltd on behalf of McCarthy and Stone	6	Appendix 2	I would like to congratulate those who have designed this section as they have identified Sheltered Housing and have given it its own thresholds. However I do not feel that these thresholds are correct. In previous experience of McCarthy and Stone developments and other council's representations to Core Strategies and Parking Standards the most common thresholds are; 1 parking space per 3 dwellings, 1 parking space per staff.	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. This has been delayed and standards will now be set out in an SPD. Flexibility will be provided in the Proposed Submission policy within the constraints of maximum standards, PTAL and government guidance.	Include standards within separate SPD Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria.
Peacock and Smith on behalf of WM Morrison Supermarkets Plc	6	Appendix 2 – Cycle Parking	Objecting – our client objects to the suggested standards for Class A1 retail development of 1 space per 200sqm GFA. Such standards should have more flexibility to reflect the lack of need for such parking in large format retail development, where bulk-shopping is the 'norm'. Suggest – that in 'bulk retailing' developments such as supermarket and retail warehousing, an appropriate standard of 1 cycle parking space per 400 sqm GFA is more than adequate to meet the needs of cycle-based consumers.	Car parking standards will be set in line with the LTP2, South East Plan, PPG 13, PPS 3 and the Halcrow Car Parking Study. This has been delayed and standards will now be set out in an SPD. Flexibility will be provided in the Proposed Submission policy within the constraints of maximum standards, PTAL and government guidance.	Include standards within separate SPD Amend car/cycle parking standards to ensure that parking will take into account not only PTAL maps but also other criteria.
GOSE	8	Appendix 3 - Housing Trajectory	The housing trajectory does not appear to make reference to the different sources of housing provision which would add up to the housing numbers. For example, a stacked bar chart showing the delivery by different elements of supply over time may be useful. You should also consider the advice in PPS3 (paragraphs 59 to 61) with regard to windfalls and maintaining a continuous supply.	Agree to include more detail. Although windfall housing sites have provided a significant amount of housing for Southampton; the housing trajectory identifies a 10 year supply of housing on allocated sites as demonstrated in the SHLAA and in accordance with PPS3.	Amend trajectory to show more details of housing provision

Major / additional changes in Proposed Submission Core Strategy:

- **Preferred Options Appendices reordered:**
 - **Appendix 1 Saved policies – now Appendix 3 and restricted to Local Plan Review policies replaced partly or in full in the Core Strategy**
 - **Appendix 2 Detailed parking standards - deleted (to be incorporated into a separate SPD)**
 - **Appendix 3 Housing trajectory – now Appendix 1 and updated to reflect SHLAA and revised guidance in PPS3 on including allowances for windfall housing units**
 - **New Appendix - PTAL map (new Appendix 2)**
 - **New Appendix - Background Papers and Surveys (new Appendix 4)**