

SOUTHAMPTON CITY COUNCIL
EXAMINATION OF CORE STRATEGY PARTIAL REVIEW (PR) AND THE CITY
CENTRE ACTION PLAN (CCAP)

A RECORD OF THE DIALOGUE BETWEEN THE INSPECTOR AND THE COUNCIL
(APRIL – JUNE 2014)
FOLLOWING THE HEARING SESSIONS.

1. From Inspector to Council, 16th April 2014

SOUTHAMPTON CITY COUNCIL
EXAMINATION OF CORE STRATEGY PARTIAL REVIEW (PR) AND THE CITY
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Further Suggested Modifications

1. At the Hearing sessions held on 31 March, 1, 2 and 4 April 2014 I raised a number of Matters, Issues and Questions which formed the basis of further evidence and discussion. During these sessions a number of possible changes to the PR and CCAP were discussed. My role is only to consider changes necessary to ensure that the plans are legally compliant and sound. In order to be sound the plans must be positively prepared, justified and effective as well as consistent with national policy. At this stage I have no reason to consider that, subject to modifications, there is likely to be an issue with the soundness of the plans.
2. Before the Hearings began the Council prepared a list of modifications that it is proposing to advertise. At the same time the Council may also wish to consider making the further modifications set out in the tables below. These reflect the additional changes that I consider at this stage are needed to make the plan sound. They should not come as a surprise as they concern matters discussed during the Hearings sessions.
3. At the end of the consultation period the Council should send the responses to me, together with a brief analysis. I will take all the representations into account before finalising my report to the Council.

Partial Review

Para/ Policy	Reason	Suggested change
Policy CS 1 (2) and other relevant references in the PR and CCAP	To reflect the evidence base, in particular the Retail Update	Reduce the figure to 90,000 m ² comparison goods floorspace
Table 1	The time period appears as a phasing and does not reflect the "PSA first" approach or	Remove the phasing from Table 1 and consider placing the table in the CCAP

	that sites may come forward earlier as economic growth strengthens	
Para 4.6.4	Some of the figures in this paragraph are hard to understand when considered against the evidence base (including the South Hampshire Strategy and Background Paper on Offices)	This is not a soundness issue but it does need to be checked
Maps	This site, which is outside the CCAP boundary, is relied on to deliver significant office floorspace in the CCAP	Change the city centre boundary to include the Station Quarter (west of Southern Road) site

CCAP

Para/ Policy	Reason	Suggested change
Para 4.6	Some of the figures in this paragraph are hard to understand when considered against the evidence base (including the South Hampshire Strategy and background Paper on Offices)	This is not a soundness issue but it does need to be checked
Policy AP 1	It is unclear at present which sites are expected to deliver the significant office development necessary to meet the office requirement. The Framework is clear that local plans should address the spatial implications of economic change. Only those sites that are deliverable within the plan period should be relied on	Change Policy AP 1 to clearly set out those sites that are expected to deliver the office requirement over the plan period.
Maps	This site, which is outside the CCAP boundary, is relied on to deliver significant office floorspace in the CCAP	Change the city centre boundary to include the Station Quarter (west of Southern Road) site
Policy AP 4	To reflect discussions at the hearings	Replace the policy and its supporting text with the policy and text put forward by the Council in relation to Issue 5
General	Ancillary retail use would not normally require planning	Consider whether "ancillary" should be replaced by "small scale"

	permission.	
Policy AP 6	The “need” has already been identified in the retail assessment	Change the second criterion to remove the requirement to demonstrate retail need
Policy AP 6	The Framework provides guidance for dealing with out-of-centre or edge-of-centre retail development. Convenience shopping is dealt with in Policy AP 7	The last paragraph of the policy could be deleted
Policy AP 7	There is no control over changes between different types of retail use. The first part of the policy is a statement and could be placed in the supporting text	The first sentence of the policy could be deleted
Table 4	To bring the plan up to date	Consider updating the table to include 2013 completions
Policy AP 16, Bullet 4	In response to comment by SCAPPS	Include reference to the parks
Paragraph 4.162	Conflicts with Policies CS 12, AP 16 and AP 24 where the importance of key/ strategic views are recognised and should not be compromised	Consider replacing the last sentence with: “High quality development may however be considered if the strategic view is one of a number of similar views or part of an open vista which is largely retained”.
Map 12: Tall buildings	To reflect the intention of Policy 17 as proposed to be modified	The Council is intending to delete one of the sections of the purple line on the map. The legend should make clear that this is indicative of where individually designed buildings could be located
Policy AP 23	The Council should consider how it would deal with a proposal to redevelop the existing industrial estate with the current policy wording	If the Policy sees the longer term future of this site in uses other than industrial, then consider re-wording the first paragraph
Map 20	There was much discussion about where the outer (river) boundary of the development site (and Quarter) should lie. It has been drawn more tightly in the proposed modification. However this may not allow sufficient flexibility or space to undertake construction works and permanent fixings to the river bed	Consider whether the outer boundary should be as originally shown in the submission plan. Further explanatory text or a policy criterion could be added to explain that the boundary has been drawn in such a way as to allow associated construction activity and fixtures to the sea bed. It should be made clear that such works would require consultation with the Harbour Master and Port Authority and Port operations should not be adversely affected.

Policy AP 28	To ensure that new residential development takes account of existing nearby noise generating uses. The Council may though consider that this is unnecessary in view of the planning permissions that have already been granted	Consider whether a requirement for appropriate noise mitigation measures should be included as an additional criterion
Paragraph 5.97	To reflect the existing situation and the likelihood that the current industrial/ nightclub uses will not move away until later in the plan period	Include reference to the B2 use and nightclub on Orchard Place
Delivery	To ensure that the delivery of the office and retail policies is properly monitored	Consider whether sufficient key indicators have been included to effectively monitor the amount of new office floorspace coming forward on the Policy AP 1 sites and the amount of retail floorspace coming forward in the PSA
Appendix 4	To reflect the evidence given at the Hearings	Amend table to reflect the 600 homes on the Royal Pier site

Christina Downes

INSPECTOR
16 April 2014

2. From the Council to the Inspector, 30 April 2014

Thank you for your post hearings letter; and for the opportunity to discuss proposed modifications with you before they are finalised for consultation. We're aiming to have the full schedule of changes ready to show you by the week commencing 19 May. In addition, if possible, we'd welcome the chance for feedback on the following points beforehand to check to see if you're content with our emerging approach.

1. Offices

The redraft of the office section is one of the more significant changes. Hopefully we've addressed your concerns - please see the attached. (Please disregard the figures in the first paragraph. We will be amending these to provide more clarity and consistency with the South Hampshire Strategy in line with your advice).

2. The Retail Target.

The 'Strategic Perspectives' (2014) [SP] study baseline scenario (which incorporates an increase in the internet's market share from 10.5% to 15.9%)* generates the 90,000 sq m figure (2006 - 2026). At the examination we proposed a range of 90,000 - 100,000 sq m. The upper figure reflects a small increase in Southampton's market share from 33% to 34%, which we consider to be both realistic and properly reflects the 'centres first' policy approach to 'claw back' market share which currently goes 'out of centre'. Our

perception at the hearing was that presenting a range wasn't a major issue, so we would like to double check this with you. We would prefer to undertake the consultation on the basis of a 90,000 - 100,000 sq m range if this is possible?

*(SP also produced an 'upper end' internet projection of 18%, which generates a target of 82,000 sq m. However if an increase in Southampton's market share to 34% was also incorporated into this scenario, this would broadly get us back to 90,000 sq m; so we consider a 90,000 - 100,000 sq m range to be robust).

3. Retail Expansion

Policy AP 6 Extension of the Primary Shopping Area – as discussed at the hearings, you've asked that the second criterion is amended to remove the requirement to demonstrate retail need. Can we take the following approach instead?

- Amend the criterion to “2. the identified need for the development is unlikely to be met within the existing PSA”; and
- Change the supporting text para. 4.54: "The appropriate amount of additional retail floorspace outside the PSA and its phasing will be considered against the Council's assessments of retail need (as set out in this plan or as revised based on ongoing monitoring, ~~based on the strength of economic growth and expenditure~~); and the delivery of schemes and level of vacancies within the existing PSA. The overall health of the retail centre will also be subject to ongoing monitoring".

(We accept that retail need is not a separate test to be considered at planning application stage. Therefore we've rephrased to tie 'the identified need' into the Council's plan led assessment. We still consider there should be a cross reference to this to judge the sequential test at the planning application stage. The sequential test depends on how much retail development can be fitted into the PSA, and so we need to cross refer to what 'how much' is (ie the plan led assessment of retail need).

4. Reference to Retail Development in Site Policies

Central Station, Chapel Riverside and Ocean Village – for clarity, the Council would like to include standard wording 'small-scale retail or retail development which meet policies CS 3, AP 5, AP 6 or AP 7'

Royal Pier Waterfront – We would also like to continue to include speciality retail. This is not included in your letter but would this be acceptable? The wording in this case would be: "small scale retail, or retail (including speciality retail) which meets policies CS3, AP5, AP6 or AP7, or clearly delivers overriding regeneration benefits". Supporting text in 5.52 will clarify that speciality retail at Royal Pier Waterfront is 'appropriate to a waterfront location'. It will also include guidance (after stating that retail should 'complement instead of compete with the primary shopping area'), that 'Retail uses may however be important in the delivery of the scheme, or in creating an active waterfront, and therefore regeneration benefits will be a consideration in addition to the sequential test and impact assessment'.

(This ties in with our response to your questions at the hearing).

5. Supporting Text on Views

Para 4.162 (supporting text to Policy AP 16 Design). Your letter explains we should 'consider replacing the last sentence with: "High quality development may however be considered if the strategic view is one of a number of similar views or part of an open vista which is largely retained". Can the Council add in extra text at the end to state 'or where there is an overriding benefit of the development of an allocated site'?

(We've sought to address your concerns by strengthening the original wording, whilst maintaining some flexibility if required).

3. From the Inspector to the Council, 1st May 2014

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Further Suggested Modifications

1. Offices

- a. The redraft of the office section generally provides a much more focused approach which sets out more clearly the sites which are envisaged to meet the office requirements. The 2 new tables are very helpful.
- b. It is appreciated that the Council does not want to deter regeneration by insisting on unrealistic office requirements. On the other hand it is also important to ensure that office uses are not pushed out by other higher value land uses. Paragraph 4.5 of the Council's note provides an appropriate amount of flexibility with tests that can be applied if a developer wishes to reduce the office content.
- c. I am though concerned that this has been watered down by Paragraph 4.6. Most of the sites in this paragraph are those on which the Council is relying to deliver its office requirements (especially in the short/ medium term). Sites in Table Xb are longer term and Station Quarter Southside and West Quay Industrial Estate, for example, are unlikely to contribute before 2026. Royal Pier Waterfront in particular is a very important site for office development and as I recall the developer is anxious to have a reference included about its contribution of up to 73,000 m² of offices. The wording almost invites a reduction in office provision! Similarly with Station Quarter north of Western Esplanade. If Station Quarter west of Southern Road is a good location for office development why indicate that other uses may be entertained? It would be better left unsaid in my view. So I am actually wondering whether Paragraph 4.6 is necessary at all? The Council's priorities for these sites are set out in the individual quarter policies anyway.
- d. Map 3 will presumably need to be changed to reflect the inclusion of the Station Quarter (west of Southern Road) site within the city centre boundary.

2. The Retail Target

- a. I do not object to a range of provision if that is what the Council would prefer. However I do not believe that the evidence base supports a range with an upper level of 100,000 m².
- b. In the Retail Update the gross floorspace capacity with an increase in market share is 59,003. If IKEA and Watermark West Quay are added in this would rise to 97,116 m². If internet trading is at a higher level than the Experian forecast then the figure would be 80,095 m². These seem to me to represent the two extremes compared with the baseline of 87,785 m². A blended average would be around 88,332 m² and in reality it seems likely that there would be some increase in market share (hence raising capacity) and some increase in internet sales (hence reducing it).
- c. Unfortunately there is no sensitivity test that combines the two, which was a point I made at the hearing session.
- d. I therefore remain to be convinced on a figure that exceeds the 90,000 m². The Council may wish to ask Dr Norris whether he is able to provide more evidence that would support a higher level of retail floorspace but on the evidence currently available it is difficult to support it.

3. Retail Expansion

- a. Whilst I understand the Council's intention I still have some concern about the reference to the "identified need" in criterion 2. This seems unnecessary anyway because the first part of the policy already establishes that there is a "need" for more comparison floorspace in the city centre. The proposed revision to Para 4.54 makes clear that the need derives from a plan-led assessment.
- b. I suggest criterion 2 merely needs to say: "there are no suitable sites within the existing PSA", which establishes the Framework compliant sequential approach.

4. Reference to Retail Development in Site Policies

- a. I meant to ask the Council about the provenance of the 750 m² floorspace limit for "small scale" retail. This is effectively a locally set floorspace threshold as referred to in Paragraph 26 of the Framework. Could the Council prepare a short note on how this has been derived please?
- b. **Central Station, Chapel Riverside and Ocean Village:** I am not sure whether AP 5 is relevant to any of these sites? Policy AP 6 is only relevant to Station Quarter I believe. It would be better for the wording attached to each quarter to refer only to the relevant policies.
- c. Apart from Station Quarter, which includes land within the Area of Search for the PSA extension, I am concerned about encouraging retail development other than that which is small-scale (ie under 750 m²) on the other two sites. It seems to me that such proposals would not necessarily be subject to sequential or impact tests as they would be retail uses "in accordance with an up-to-date Local Plan" (Paragraph 24 of the Framework). However this may just be a matter of wording because as far as I am aware the Council is only wishing to encourage small scale retail uses at Chapel Riverside and Ocean Village. Perhaps this could be confirmed?

- d. **Royal Pier Waterfront:** It seems to me that speciality retail uses would be acceptable if that is what the Council wishes to see on this site. However it seems that the Council is not against larger scale retail development on this site. If that is the case then Policy AP 28 needs to make clear that retail uses over 750 m² will be assessed for retail impact. It was pointed out at the Hearing that many marine type retail outlets also sell high end fashion goods. The sequential test would only be relevant if the Council wanted to ensure that PSA and PSA expansion sites were developed first. This seems unlikely. So I think the wording needs to be adjusted to include a requirement for an impact assessment on retail proposals over 750 m² although the consideration of regeneration benefits is clearly a relevant one when undertaking this test.
- e. Again, I am not sure that Policy AP 5 is relevant to the Royal Pier site.

5. **Supporting Text on Views**

- a. I do feel that the last part of the final sentence to Paragraph 4.162 conflicts with the importance of strategic views in both the Core Strategy and other parts of the CCAP. Policy AP 16 specifically requires such views to be protected. The wording being suggested about an “overriding benefit” seems open to interpretation and argument.
- b. There will be circumstances where material considerations indicate that a development proposal should not be determined in accordance with the development plan. Policies cannot cater for every eventuality. Nevertheless the plan needs to be strong and clear in its intent. Of course it is always open to the Council to reassess whether all of the strategic views are worth keeping although from the representations it seems that these are of considerable community value.

I hope this provides helpful clarification. However if the Council want to come back with further questions I will be happy to address them.

Christina Downes

INSPECTOR
1 May 2014

4. **From the Council to the Inspector, 13th May 2014**

Thank you for your 2nd note with your response to our initial draft amendments. This covering note provides a brief summary of the further amendments we have made in the light of your response; and answers your additional questions.

Offices

There have been 2 changes since our initial drafts:

- Amending the first paragraph to clarify how the development targets relate to the South Hampshire Strategy (with a new Appendix 2 setting out a more detailed comparison).

- In line with your response, deleting the 'site specific' supporting text (except additional explanations for the Western Gateway and East Park Terrace sites which we consider remain relevant and respond to earlier representations). As a consequence of these deletions, we have made two small additions to para. 4.10 of the Plan (to refer to key sites and infrastructure costs).

Retail

Target

If there is a case to increase the target in the future, this can be established through the Council's ongoing monitoring. At this stage we accept that 90,000 sq m is a robust target and so do not wish to press for this to be presented as a range with a higher figure.

Retail Expansion

We have made amendments to address your comments.

Reference to A1 Retail Development in Site Policies

The intended approach for sites is as follows:

- To support small scale retail (750 sq m and below) on all sites. Please see note overleaf regarding the 750 sq m threshold.
- We agree that AP5 is only relevant to sites within the existing primary shopping area, and AP6 is only relevant to North of West Quay Road / Central Station, and have amended the Plan accordingly. The relevant policies for other sites are CS3 / AP7 (which apply the tests of significant adverse impact and the sequential approach). (For clarity we propose to use the CSPR to change the reference in CS3 from 'PPS6' to 'national policy guidance').
- Existing primary shopping area – support all A1 retail proposals.
- Extended primary shopping area (including Station Quarter) – support A1 retail proposals which meet AP6 or CS3 / AP7.
- Royal Pier – support A1 retail (including speciality retail) which meets CS3 / AP7; or has an overriding regeneration benefit. (We would prefer the retail references to cover impact, sequential approach and regeneration to ensure all considerations are covered, and to enable the Council to maintain control over the form of retail proposals at Royal Pier).
- All other sites: support A1 retail which meets CS3 / CS7. The Plan relies on the general CS3 / AP7 policies for these sites. The site policies for Chapel Riverside / Ocean Village explicitly cross refer to CS3 / AP7, given the waterside regeneration potential of these two sites. However we are not seeking additional encouragement for retail on these sites, simply to apply existing national policy. Para. 4.56 and the following new para. explain this approach; and cite Chapel Riverside and Ocean Village as two examples of such sites where retail proposal would be considered under CS3 / AP7.

Text on Views

We have made amendments to address your comments.

Please see map attached to show where changes will be made to Map 12 (Indicative) Tall Buildings

Note on 750 sq m retail threshold

Planning policy in Southampton has included a local threshold of 750 sq m since the Local Plan Review Initial Deposit was published in 2001. At this time, PPG 6 (paragraph 4.13) included a threshold of 2,500 sq m gross floorspace but noted that assessments may be necessary for smaller developments. Southampton's threshold was set at a lower level in order to use the same threshold for all the Southampton's centres including local and district centres.

The 750 sq m threshold is larger than the size of large convenience stores and smaller format supermarkets such as Tesco Express or Sainsburys Local. In the city centre, it is also larger than the ground floor footprint of comparison retail stores such as Primark (Above Bar Street) and smaller units on the WestQuay Retail Park such as Mamas and Papas. Above this level, the Council considers that retail development will start to have an impact and this should therefore be a policy consideration.

The 750 sq m threshold was accepted in two examinations; the Local Plan Review (held in 2005) and the Core Strategy (in 2009). Few comments were raised on the Local Plan Review. The Government Office of the South East noted however, that units larger than 750 sq m in district and local centres may change the nature of the centre.

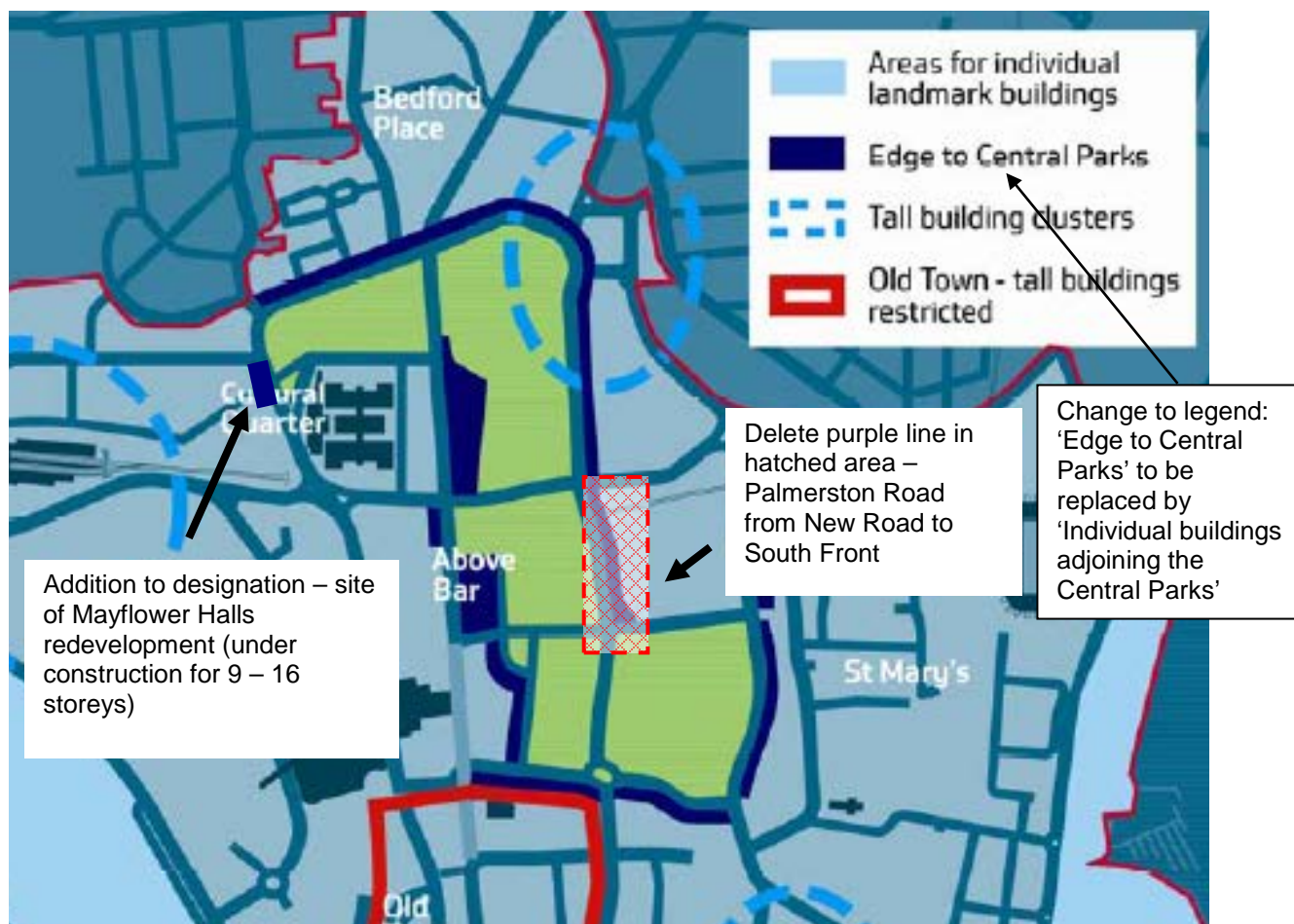
The Core Strategy Inspector addressed the threshold in paragraph 4.20 of his examination report (on policy CS 3 'Town, district and local centres, community hubs and community facilities') which states:

'The last paragraph of the policy requires that new retail provision of 750 sq m or more outside the centres, will be subject to the PPS 6 sequential test. Given the acknowledged stability of the city's retail hierarchy and the current relative vitality of the district and local centres, as well as Shirley town centre, I am satisfied that this will provide the necessary level of control in relation to schemes that might threaten the individual viability of the existing centres across the city to fulfil their respective roles. Bearing in mind that the threshold level selected has been operating satisfactorily for some years under the extant policies of the Local Plan Review (LPR) (CD92), policy RET11 of which is still "saved", I am content that this is an appropriate starting point for the application of the sequential test in the current circumstances of Southampton and its well established retail hierarchy'.

The 750 sq m threshold is used in the city to identify proposals where there may be a retail impact. Where the retail development is just above 750 sq m, a full impact assessment may not necessarily be required but impact will be a policy consideration when determining these applications.

The City Centre Action Plan and Core Strategy Partial Review continue to apply the same threshold as this is a well established approach which has been successfully used across the city. It is in accordance with the NPPF which permits a locally set floorspace threshold with a default threshold of 2,500 sq m if one is not in place.

Excerpt to show changes to (Indicative) Tall buildings map (map 12)



5. From the Inspector to the Council, 27th May 2014

Please thank the Council for their helpful note and the further changes they have proposed. These seem to me to address the points I have raised. There were only 2 minor things:

1. Map 3 does not seem to have been altered to include the site west of Southern Road.
2. In the proposed changes to Paragraph 6 (offices) I didn't understand what was meant by the following sentence: "on a "like for like" basis with the South Hampshire Strategy targets, this is the equivalent of 111,500 sq m of new offices (2011-2026)". Maybe this is explained in the new Appendix 2 (which I haven't got) but on the face of it I found it confusing.

6. From the Inspector to the Council, 30th May 2014

I have been looking again at Natural England's representations and its concern about the compliance of the CS with Paragraphs 113 and 118 of the Framework. The changes to Policy CS22 don't seem to address the point about a criteria based policy to show how

development proposals affecting wildlife/ geodiversity sites will be considered particularly distinguishing between different hierarchies. Natural England suggest two examples referred to as DM4 and DM5. I have no way of knowing what these say - the link in their letter doesn't work. I wondered whether the Council could send me copies and whether they have consulted Natural England again on the proposed change to the policy? On the face of it however it doesn't seem to me to meet the points made or the two aforementioned paragraphs in the Framework.

7. From the Council to the Inspector 5th June 2014

Biodiversity

We did discuss the changes to the CSPR CS 22 (and the CCAP new para. after 4.155) with Natural England, by way of emails, phone conversations and a meeting. This led to the changes in CD3 / 10, which Natural England agreed addressed their representation. (These now appear as changes MM5, 47 and 48). This agreement with Natural England is set out in letters CD97 and 98, which I attach.

Natural England's original concern, with reference to the NPPF paras. 113 and 118, was that policy CS 22 did not set criteria based policy but simply requires "appropriate consideration"; and did not set out an 'avoidance - mitigation - compensation' hierarchy. We (and Natural England) consider the MM5 change addresses their concerns by introducing:

- a policy with separate criteria for international and national / local sites;
- a clear test that development 'does not adversely affect' or 'is unlikely to have an unacceptable impact on' designations
- an avoidance, mitigation, compensation hierarchy.

In our view these revisions do introduce a criteria based policy which show how development will be considered, and distinguish between the hierarchy of designations, addressing the NPPF paras. 113 and 118.

(Policies DM4 and DM5 relate to the Dorset Minerals Strategy. DM5 appears the most relevant. The link is as follows:

<https://www.dorsetforyou.com/media.jsp?mediaid=193807&filetype=pdf>)

Other Points

For information, ABP, Royal Pier Waterfront Ltd and the Council have agreed a boundary and set of wording for the site. This is incorporated in the list of changes. In brief, the boundary reflects the current development proposal and the text acknowledges that some additional works might be required outside this boundary.

Map 3: The city centre boundary is extended to include the whole area west of Southern Road. The Station Quarter development site is also extended to cover this area, with the exception of the recently completed Police HQ which has already been developed.

Offices: The reference to 'on a like for like basis' refers to translating the 110,000 sq m target (2006 base date and net gain) to the 111,500 sq m target (2011 base date and gross gain). We appreciate this gets a bit complicated, and have sought therefore to

provide the explanation in Appendix 2. The Appendix appears at the end of the Additional Modifications (page 21, titled "Appendix - New appendix on development targets").

8. From the Inspector to the Council, 10 June 2014

I have one new point to raise - sorry it has come rather late but I hope there wont be a problem and that it can be added to the main modifications list. The definition of "small scale" retail is found in Paragraph 4.61 and the Council gave me the background to it which is fine. However this is in effect a locally set floorspace threshold (Para 26 of the Framework) and should be included in Policy AP 7 itself rather than its text. I think there is a court case that relates to this but I'm not sure what it is. Please could the Council also just check to make sure that no similar issues arise in other places.

I have noticed that Policy AP 6 also refers to "major comparison retail development" and the text (Para 4.50) gives the definition. For the same reason this should be included in the policy. There are possibly other places too - including the site specific policies.

9. From the Council to the Inspector, 11th June 2014

Please confirm to the Inspector that we will introduce the 750 sq m retail threshold as per below. We will do this as follows:

Policy AP6

- adding in the 2nd paragraph that major comparison retail development is "(750 sq m gross or greater)"

Policy AP7

- The first para. to start: "Proposals for major convenience retail development (750 sq m gross or greater)..."

-The second para. to start: "Small scale and specialist local food shopping including food markets (less than 750 sq m gross)..."

Site policies

-where site policies refer to "small scale retail" add "(under 750 sq m gross)"

-the one exception is Policy AP37 with reference to St Mary Street. Given this is a designated secondary shopping area, I'd suggest a degree of flexibility to accommodate other local retail uses which might be a bit larger than 750 sq m gross. I'd suggest criterion iv would read: "Within St Mary Street secondary shopping as identified on the Policies Map, small scale retail (A1) (under 750 sq m gross), other local retail and food and drink uses;..."

I've looked through all the other policies and can confirm there are no other points where this type of issue arises.

10. From the Inspector to the Council, 11th June 2014

Yes that seems to be fine. I presume these will be additional main modifications.

11. From the Inspector to the Council, 12th June 2014

Please could you ask the Council the following:

1. The change to the city centre boundary is surely a main modification to both the Partial Review and the CCAP? Also wont most of the maps in the CCAP need to be changed?
2. There also does not seem to be mention of the extension to the PSA expansion area which presumably should be included as a main mod to Map 4?
3. Have the maps within the CCAP been checked to make sure the changes are noted in the modifications?
4. Will the significant changes to the policies maps be included with the schedule of modifications?

12. From the Council to the Inspector, 18th June 2014

Maps

We've made some detailed changes in the light of your comments. The last attachment above is the latest version of the map document. This shows all the changes to the maps since 'proposed submission'.

In response to your questions:

1. The change to the city centre boundary is surely a main modification to both the Partial Review and the CCAP? Also wont most of the maps in the CCAP need to be changed?

Yes, see first map on page 2. This explains that the relevant change will be made to all maps. (This avoids the issue of recommissioning graphics at this stage for some of the maps). There is also a cross reference to this in MM129.

2. There also does not seem to be mention of the extension to the PSA expansion area which presumably should be included as a main mod to Map 4?

Yes, see changes to map 4 and policies map on page 4. There is a cross reference to this in MM132.

3. Have the maps within the CCAP been checked to make sure the changes are noted in the modifications?

and

4. Will the significant changes to the policies maps be included with the schedule of modifications?

Yes. A brief text description of all the map changes (on the policies map, and the illustrative maps within the CCAP) are now included in the main / additional modification schedule, with a cross reference to the relevant map in the map document. MM129 - MM136 set out the main modifications; AM82 - AM84 set out the additional modifications.

13. From the Council to the Inspector, 18th June 2014

Health and Safety Executive

We had a bit of doubt about how to set out the locations with hazardous substance consent, and the requirement to consult the HSE on relevant nearby planning applications. On reflection we think the following position is best, for your info and any comment. Apologies this is late in the process.

There are two locations with Hazardous Substance consent in the city centre:

1. The gasholder site on Britannia Road north of the football stadium. This is understood to be fully redundant now. However the hazardous substance consent remains in place and could be used by Transco to store materials, so the HSE have confirmed the requirement to consult them on relevant development within 300 metres of the site remains in place.
2. The Eastern Docks explosives licence. At present the consultation zone is shown as the last map on page 16 in the map changes just sent to you by separate email. It is almost entirely within the operational port and just extends in to the Ocean Village Quarter.

At the preferred options stage of the CCAP the HSE sent what appears to be a standard response, explaining that they don't comment on individual plans. I attach their comments. This requested that the plan includes a policy statement on the requirement to consult, and identifies the facilities on the policies map. They did not make comments at submission stage.

The CCAP already indicates in the design guidance to the Itchen Riverside and St Marys Quarters* (with respect to the gas holder site) and Ocean Village* (with respect to the eastern docks), the requirement to consult the HSE. The updates to the policies map already include the eastern docks consultation zone. Given its continued status, we now also intend to show that part of the gas holders consultation zone within the city centre on the policies map. We will add this to the map documents.

*See Proposed Submission Plan pages 121, 151 and 156 last bullet point of design guidance.

The 2006 local plan had a proposals map for the city as a whole, with a full inset map for the city centre. On adoption of the CCAP and Partial Review we intend only to produce a fully updated policies map for the city centre.

However it would seem sensible to use the Partial Review of the city wide Core Strategy to produce an illustrative addendum to the city wide map. For the sites with hazardous substance consent outside the city centre it will probably take a couple of weeks or more to check the installations and prepare the maps. There were 7 installations outside the city centre listed in the local plan although I suspect only 4 of these still apply. Rather than hold up the consultation on the modifications, I'm hoping this can be regarded as a further 'additional modification' that we can make at any time; as it is simply identifying the existing factual position regarding consultation requirements.

There is a separate requirement to consult the MoD on proposals within their explosives zone around Marchwood Port, the outer limits of which encompass Western Gateway and Royal Pier. The way the Plan identifies this is unchanged. In the Proposed Submission Plan it is identified at para. 4.166 (Design section) with brief cross references to this para. in the design section of the Western Gateway Quarter (on page 103), Royal Pier (on page 109) and Old Town Quarter (page 128). As previously intended, we are

adding the consultation zone to the policies map (this is the second to last map on page 16, map changes attached to the other email).

14. From the Inspector to the Council, 23 June 2014

Irene

Following our telephone conversation I can confirm that the main modifications and associated changes to the maps seem to be in order and can now be published for consultation.

15. From the Inspector to the Council, 24 June 2014

Please could you check something with the Council. The office target in Policy CS 1 of the Core Strategy is 322,000 sq m gross floorspace, which is proposed to be reduced to 110,000 sq m in the Partial Review. I am puzzled that it is considered to be "gross" as it is the additional figure after the 55,000 sq m has for lost office floorspace has been accounted for. Shouldn't it therefore be "net" or even "additional"?

16. From the Council to the Inspector, 24 June 2014

Thanks for spotting this. In this case the "(gross)" referred to the building dimensions (gross internal) but I agree in this case it is misleading. We'll rephrase to read:

At least 110,000 ~~322,000~~ square metres (**gross**) of **additional** office floorspace

17. From the Inspector to the Council, 25th June 2014

Sorry to be firing off another question but I have been trying to understand the derivation of the 111,500 sq m figure for offices in the new Appendix and really cant get to grips with it. As far as I can see the 125,000/ 181,000 sq m figure in the South Hampshire Strategy is a net figure (it says so in the Table on Page 18 of that document) and therefore would mean that it is the additional floorspace required. This would thus be comparable to the 110,000 sq m in the PR/ CCAP. Indeed this seems to be confirmed by Table Xd in the proposed mods which puts in an additional figure for losses.

The losses assumed in the CCAP (and discussed at the hearings) are 55,000 sq m (see office background paper table on Page 29). In that same table the SHS loss figure seems to be 30,600 - although I am not sure of this in light of Para 4.6.23 which would imply a much lower figure. Anyway, I cant understand where the 49,600 sq m for losses in the new table Xd come from?

Also I am not sure why 61,900 sq m and 181,000/ 125,000 sq m are in bold in Table Xd as these two sets of figures are not comparable.

18. From the Council to the Inspector, 27 June 2014

I hope the note below sets out the position and answers your queries.

2012 PUSH Strategy Figures

Whilst policy 6 of the PUSH Strategy describes the office figures as 'net additional', this is misleading unfortunately. They are actually the office targets required both for new economic growth (ie the net gain in offices) and to replace the loss of existing offices. They cover the period from 2011 to 2026 and include the 125,000 / 181,000 sq m target for Southampton.

I've added a technical note at the bottom to set this out.

Core Strategy / CCAP figures

Therefore the 125,000 / 181,000 sq m targets:

Are not comparable to the 110,000 sq m headline target in the Partial Review, repeated in the CCAP Appendix Tables Xb and Xc. This is the target for just the net gain in offices, and for the different time period of 2006 – 2026.

Are comparable to the 111,500 sq m target, now set out in CCAP policy AP1 and repeated in Table Xd. This target covers both the net gain in offices and the replacement for the loss of existing offices; and for the same time period of 2011 – 2026. Table Xd sets out the net gain in offices (61,900 sq m) and the replacement for the loss of offices (49,600 sq m) which together total to the requirement for 111,500 sq m.

(It might be worth emphasising that the 111,500 sq m and 110,000 sq m figures are not the same figure one rounded to the other. They are completely different figures, it is just unfortunate that they happen to be very similar!)

Office Losses

All the figures in Table Xd, including the 49,600 sq m losses, are from 2011 – 2026.

The 55,000 sq m office loss set out in p29 of the background paper is from 2006 – 2026. The difference between the two figures is the loss which has actually occurred between 2006 and 2011.

(Para 4.6.23 of the background paper sets out that, based on the DTZ assumption, there would be a loss of 1,725 sq m per annum. The p29 Table shows that over the period 2013 – 2026 this amounts to 22,425 sq m; and adding in the actual losses which have occurred from 2006 – 2013 [8,200 sq m] gets to the 30,600 sq m figure).

Emboldened Figures

Having reread this, I don't think that putting some of the Table Xd figures in bold as helped. As you say, the emboldened figures are not comparable with each other. We will 'de-bold' these.

Amendments

In the light of all of the above, and a general reread of the CCAP Appendix, we intend to make some very minor additional amendments to aid clarity when we adopt the plan. The first attachment shows an annotated version with these amendments.

Technical Note: 2012 PUSH Strategy Figures

The second attachment is an extract from the PUSH “Employment floorspace and house building provision figures” background paper, which sets out the basis for the 2012 PUSH Strategy office figures.

Page 5 table 2.6 is the starting point. It sets out a table from the PUSH Economic Strategy, based on forecasts undertaken by DTZ.

Column F sets out the South Hampshire office “Development requiring supply” figure of 760,000 – 840,000 sq m. This is made up of:

Column A – “Accommodating forecasted employment change”. (This represents new economic growth and is the net gain in offices required)

Column C – “Replacement requiring supply”. (Column B is forecast total loss of office space. It is assumed that 50% of this is offices demolished and then replaced as offices on the same site, so does not represent a permanent loss. Column C is the remaining 50% - a loss of offices which isn't re-provided on site and so needs to be replaced elsewhere).

Column D – Choice and flexibility – a 10% uplift.

The key point is that Column C sets out the predicted loss of offices which needs to be replaced on new sites, and Column F is therefore the target for new economic growth (net gain of offices) and to replace the loss of existing offices.

(Pages 6 to 7 start from the Column E total of 910,000 – 1,070,000 sq m and convert this to the equivalent of the Column F total, after accounting for taking out the New Forest [which at that stage had left PUSH] and rebasing from 2006 to 2011). The table at para. 1.19 sets out the resulting range and para. 1.21 explains that the bottom end of this range is chosen – 580,000 sq m; which is the total South Hampshire target which appears in policy 6 of the 2012 PUSH Strategy).

19. From the Inspector to the Council, 27 June 2014

Please thank Mr Tuck for his explanation. I suggest that the changes being proposed are minor/ additional modifications.