

Consultation Responses – C SPR 2012

Core Strategy Partial Review – Schedule of Comments and Proposed Response (Version for Members' Room)

Organisation / individual	Comment No.	Para / Policy etc	Summary of comment	Officer response	Recommended change
EBRA	1	General	The changes to the Core Strategy are noted.	Noted	
Business Solent	1	General	Strongly supports this proposed revised approach, the accompanying draft detailed changes and the analysis informing these changes.	The support is welcome	
Hammerson	1	General	<p>Object - In undertaken the C SPR, SCC should also take on board other changes to the Core Strategy evidence base including the GVA Retail Study which updated the study used to formulate the Core Strategy. The GVA study found quantitative capacity for significant additional convenience goods floorspace and a qualitative argument to support a new modern city centre superstore. It also revised the comparison goods capacity figures which are substantially less than envisaged. If SCC is undertaking a partial review, Hammerson is strongly of the view that it provides an appropriate opportunity to update the retail capacity figure.</p> <p>Alternative approach - Broaden extent of C SPR to include updated retail capacity figures as set out in the GVA retail study (July 2011)</p>	The reduction in the retail targets is much less than the reduction in office targets, and there is more flexibility in the adopted core strategy (2010) regarding the retail targets. However the retail sector is undergoing significant change and therefore it is agreed that the retail target should be reduced through the C SPR rather than just the CCAP.	Reduce retail targets
Hampshire Chamber of Commerce	4	General	There needs to be a clear statement relating to creation of jobs / business space / housing proposed for the city centre (no mention of affordable housing in city centre; this assumes that those working in offices will be on high incomes living outside the city centre.	This is covered by the CCAP. However it would be useful to add anticipated job and population growth to the CCAP.	
Environment Agency	1	General	The Environment Agency has no comments on make regarding the reduction of office targets.	Noted	
Natural England	1	General	Natural England has no comment to make on the C SPR.	Noted	
Business Solent	2	General	Business Solent endorses the revised Core Strategy policies CS 1, CS 6, CS 8 and text.	The support is welcome	
Hammerson	3	General	We would welcome the opportunity to discuss our comment with you in more detail should this be appropriate.	Noted. A meeting has now taken place.	
A. Samuels	15	General	This draft amounts to "nothing much". Scoring out references to the discredited south east plan, and recognising contemporary economic difficulties and claiming a new flexibility is useful, but not exactly a programme for the future. Merely playing about with the amount of office space and the dates is not exactly an incentive or encouragement for developers.	Noted. The review provides a more realistic basis for the City Centre Action Plan, and the appropriate mix of office and other uses on development sites. This realistic approach will aid delivery.	
A. Samuels	16	General	The reality is that the city council wishes developers to build offices in the city centre, and will be very reluctant to refuse planning permission; and anyway there will be a presumption in favour of permission. Hopefully the level of CIL will not prove too much of a deterrent. So the "bargaining" position of the council is not strong.	The Council does wish to support office development in the city centre. The CIL is being set at a £0 for most commercial development.	

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Hampshire Chamber of Commerce	1	1.3 / 2.4	The 120,000 sqm cited is short of the forecasts in the emerging CCAP and CCM.	The figure is consistent with the approach in the CCAP. Some of the figures in the draft CCAP related to overall physical capacity, although these are no longer included in this way. The City Centre Master plan figures also refer to overall physical capacity.	
Hampshire Chamber of Commerce	2	1.3 / 2.4	There needs to be more detail as to how this will affect the adoption of a CBD and whether it dilutes the vision and aspirations for the CBD.	The City Centre Action Plan sets out the vision for a business district. Major new office development is still proposed.	
Hampshire Chamber of Commerce	3	1.3 / 2.8	Needs to be a clearer economic statement; the original rationale is based on PUSH strategy, but CSPR is missing sector-based arguments / numbers of jobs / how this relates to premises going forward etc.	The Core Strategy Partial Review sets out the overall PUSH economic aims. More detail is contained in background evidence. However, a reference to the number of jobs would be useful.	Add reference to number of jobs in CCAP and CSPR, and to sectors.
A. Samuels	1	1.3	The entire Core Strategy needs to be rewritten and to conform to the forthcoming NPPF.	The Core Strategy has recently been adopted and is considered to be broadly in line with the NPPF.	
A. Samuels	2	2.3	Working in the context of PUSH is absolutely correct, as is the town and city centres first policy; provided adequate infrastructure is there. Though an awareness of the complementary and individual purpose and value of the district centres should be an integral element of the overall strategy.	The support is welcome. Infrastructure planning has and is being undertaken. The core strategy (policy CS8) already recognises the role of district centres in office provision.	
A. Samuels	3	2.3	Experience shows that the demand for office space is not increasing as much as was at one time forecast. Cost is a factor, and technology enables the space need to be reduced. Furthermore companies prefer modern purpose-built prestigious space to old premises, flexibility is a sound approach.	The 2010 DTZ / PUSH forecasts take account of the latest data on working practices / space needs. A reference in the CSPR and CCAP to changing working practices, and the need to monitor this, would be useful. It is considered the City Centre Action Plan takes an appropriately flexible approach to the safeguarding or redevelopment of older office stock.	Add reference to changing working practices, and the need to monitor
A. Samuels	4	2.4	Stated the importance of learning from recent new office developments and looking at new office space in context, i.e.	Agree. The City Centre Action Plan sets out these issues further.	

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			attractiveness of the city centre and specific locations. Note that the centre of gravity of the city has been moving westwards.		
A. Samuels	5	3.2.1	Stated the need for a variety of transport measures; public transport with improved bus priority, smart card systems, attractive pedestrian avenues, travelators, signposting (including touch screen information), safe and easy cycling routes and access for disabled. Civic Centre Road should be closed except for essential vehicles, some Harbour Parade surface car parking could provide amenity space, the council should seek to open up awareness of the proximity of the sea and access to the waterfront. Some staff parking and client parking may be required.	The Core Strategy (policy CS18) and City Centre Action Plan address many of these issues to the appropriate level of detail. The action plan promotes a redesign of the Civic Centre Road area to promote pedestrian / cyclist movements, rather than a road closure.	
A. Samuels	7	3.2.1	There may not be much increase in demand for retail space in the city centre as shoppers will visit shops to view and order goods to be delivered later. Less space is needed to accommodate the shoppers, but more for out-of-centre warehousing. The business and commercial fraternity have for long indicated their unmet need and difficulty in respect of warehouse space.	The assessment of retail needs has been updated to take account of the latest internet trends. The PUSH / DTZ forecasts have recently updated the forecasts for warehouse space.	
A. Samuels	8	3.2.1	Thriving and vibrant city centres need much more than offices and shops; they need leisure facilities (in the widest sense). See the Mary Portas Review recommending town or city teams, BIDs, flexibility in business rates, flexibility in parking regimes.	Agree. The adopted Core Strategy and the City Centre Action Plan also promotes leisure uses.	
A. Samuels	9	4.3.1	Lunch time office staff need readily accessible shops, especially a range of food shops. Southampton lacks a Waitrose or similar quality food store. Then there is the need for restaurants and cafes and pubs, and gyms and swimming pools and such like.	Broadly agree. The adopted Core Strategy and City Centre Action Plan promote a range of shops, cafes, bars and leisure facilities.	
A. Samuels	12	4.3.1	Shoppers, including office workers at lunchtime, seem to like markets, so suitable provision should be made in the centre, though not so as to damage access and fair competition for the established shops.	Agreed that markets add to the mix of attractions in the city centre. CCAP Policy 6 already refers to food markets.	CCAP: add a more general reference to markets
A. Samuels	6	CS 1	The line of commercial buildings on Above Bar facing east over Andrews, Palmerston and Houndwell parks should be "opened up" to the parks, as they are refurbished and rebuilt, to provide pleasant and attractive working conditions for staff. The bus station in Houndwell Park should be removed as buses should not layover in the parks but in the suburbs at the other end of the journey.	Agreed – this would also have wider benefits for the attractiveness of the city centre. The action plan refers to the potential, although in development terms this is likely to be long term.	
A. Samuels	10	CS 1	In other cities, office workers go into restaurants, cafes and bars after work and then on to a place entertainment. This does not happen in Southampton. The negative perception of the centre should be improved and shops and leisure facilities encouraged to open late. A concert hall, events hall and ice skating rink would be desirable (provided by the private sector).	Agree that the range of retail and leisure facilities in the city centre should be enhanced, and connections improved. The City Centre Action Plan sets out a vision to achieve this.	

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Hammerson	2	CS 8	The policy wording within CS 8 still refer to PPS 6, this should be updated. Alternative approach - Amend policy CS 8 to reflect national policy in PPS 4.	Agreed – the latest guidance is now the NPPF.	Para. 4.6.13: delete “PPS6” and replace with “the latest Government guidance”.
A. Samuels	11	CS 8	In number of clusters of small shops, e.g. East Street, Below bar, Bedford Place, and to some extent St Mary's, an infiltration of some smaller offices might help to diversify and revive such areas, as niche shopping with more office workers in the vicinity.	Agreed. These are city centre locations and the Core Strategy and City Centre Action Plan support this approach.	
Highways Agency	1	7.26	(and CCAP para 4.144) The agency looks forward to further discussions with both TFSH and SCC should the Sub Regional Transport Model identify any transport interventions impacting on the Strategic Road Network.	Noted	
A. Samuels	13	7.2.6	An overall parking strategy is essential. Park and ride is essential for office and shop workers, as the experience of other towns and cities has shown and its absence in Southampton is deplorable. Windhover, Stoneham (see Eastleigh Borough Council development proposals) and Adanac are obvious locations. In the city centre short time day parking should be flexible, reasonably priced, and a discount scheme should be run in conjunction with the retail parks, e.g. £x off the parking ticket if £y is spent in the store or £y is spent in the city centre. Technology would enable such a system easily to operate, and attract clients and customers.	The Core Strategy identifies locations for park and ride facilities. However, in the light of the reduced office targets, the latest transport modelling illustrates that these are unlikely to be needed (at least for city centre growth) within the plan period. The City Centre Action Plan sets out an appropriately flexible approach to car parking provision with new development.	
A. Samuels	14	Table 3	Query what the current scientific view and council policy is about climate change and rising sea levels as developers have been concerned and sometimes reluctant to develop in low-lying parts of the city centre.	The Council's approach to flood risk is based on the latest scientific advice on likely sea level rise, and sets out a realistic and effective approach to address these issues and facilitate development.	