

### Consultation comments on policy E6 – retaining employment opportunities

- Support - 11
- Neither support of object - 2
- Object - 3

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

<b>Comments which support policy E6 – retaining employment opportunities</b>		
<b>Respondent number</b>	<b>Comments</b>	<b>Officer comment</b>
ANON-KSAR-NKJY-D Hampshire County Council	<p>Hampshire County Council in its role, as both a public landowner and service provider, supports the ambitions of the Local Plan to encourage economic development.</p> <p>The County Council has a portfolio of buildings, including offices within Winchester and its surroundings. Many of these are offices which are situated within or close to town / city centres.</p> <p>With ongoing economic challenges facing local authorities to deliver their services and the change in working practices following the pandemic, the County Council is regularly reviewing these holdings and requests that the policy supports public sector transformation programmes. Rationalisation of office accommodation facilitates a more efficient use of floorspace and allows the public estate to be fit for purpose.</p> <p>For example, a sub-clause could be added to allow</p>	<p>Support welcomed.</p> <p>The difficulties of the public sector are recognised, however this policy is aimed at retaining employment uses and is considered to provide enough flexibility to allow for alternative employment uses, including though re-development.</p> <p>The suggested amendment to iii) is not supported, as proposals should consider employment uses and developments with a significant element of employment use where possible, in order to retain employment opportunities.</p> <p>vi) already allows for the consideration of wider benefits of proposals to be taken into account against the loss of the existing use, so an amendment is not required.</p> <p><b>Recommended Response:</b> No change.</p>

	<p>consideration as to whether the site or building is part of a public sector transformation programme.</p> <p>Sub clause iii. could be made more flexible by inserting 'could', so the sub-clause would read 'The potential of the site or building to be developed for a mixture of uses, that could include an element of employment.'</p> <p>Sub clause vi. could be expanded to clarify that the benefits could include those wider reaching than on a site scale or economic basis. For example, sub clause vi. could read 'The benefits (social, economic and environmental) of the proposed use compared to the benefits of retaining the existing use.' These changes could ensure the plan is positively prepared, flexible and effective in reaching all objectives of the Local Plan.</p>	
ANON-KSAR-N85D-G	<p>This policy should be applied without exception, consistently and not selectively. The requirement to demonstrate that continued employment use is no longer practical or viable should be assessed independently, having regard to social and economic effects on the local community. Practical or viable must not be interpreted as employment use yielding less profit than new housing development. Land ownership carries responsibilities to the surrounding community, particularly in the centre of a settlement. Land should not be exploited for maximum profit at the expense of people's livelihoods and social needs when there are alternatives.</p>	<p>Support welcomed and comments noted.  <b>Recommended response:</b> No Change.</p>

BHLF-KSAR-N8ZJ-U	Policy E6 seeks to retain land that was last used for an employment use. Proposals that would involve a loss of employment use would be expected to demonstrate that the site is no longer required for employment use and has no prospect of being must be reused as such. This is supported, particularly where the site could be converted to residential under the permitted development regime.	Support welcomed and comments noted. The local plan will not be able to override national permitted development rights, although conditions can be placed on planning permissions where justified and reasonable. <b>Recommended response:</b> No Change.
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<b>Comments which neither support or object to policy E6 – retaining employment opportunities</b>		
<b>Respondent number</b>	<b>Comments</b>	<b>Officer comments</b>
BHLF-KSAR-N8T8-3 Olivers Battery Parish Council	The proposed “considerations” where proposed development would involve the loss of existing or allocated employment land and floorspace, or land that was last used for an employment use, need to include the impact on the businesses in the remaining Local Centre if part is lost to another use. Also, the requirement to provide viability assessments of the sites and evidence of the appropriate marketing need to be relevant to the nature, scale and location of sites and not for town centre uses.	This comment appears to relate to impacts on local centres. This policy does not apply to the town centre uses which are the main components of local centres. It is accepted that local business uses in the vicinity may help to maintain the viability of local centres by their custom, unfortunately this policy can only consider the merits of continued employment use on the site itself. Any viability assessments and marketing should be relevant to the particular circumstances of the site and its location.  <b>Recommended Response:</b> No Change
BHLF-KSAR-N8R2-U Hursley Parish Council	Employment Opportunities  There is a disappointing lack of reference to employment opportunities and changes in the employment market across the Winchester District in this draft local plan. However, one large site in the southwest Winchester area just off the Badger Farm	This response relates solely to Bushfield Camp and comments relating to Bushfield Camp (W5) will be considered under responses to that policy.  <b>Recommended response:</b> No Change.

	<p>Road known as Bushfield Camp is included. Bushfield was a military training base until 1971 and some of the military buildings and parade ground remain.</p> <p>The site is adjacent to Badger Farm parish, overlooked by Compton Down and located in the Compton and Shawford Parish area. Bushfield Camp is a former military site now owned by the church commissioners and is recorded in the current local plan as an 'opportunity' site.</p> <p>Agents acting on behalf of the church commissioners envisage a 1 million Sq ft employment-led regeneration of the camp. The Bushfield site extends to about 43 hectares (105 acres or 4.6 Million Sq ft) with development planned for half the site, with the remaining area and maintained as publicly accessible and biodiverse green space. Public consultation on this site is expected to run from November to December 2022 with an outline planning application submitted by May 2023. Given the size and location of the site consideration should also be given to including an element of residential development alongside the proposed employment led regeneration plans bringing jobs and homes closer together. This would be an efficient use of an important brownfield site.</p> <p>Hursley Parish Council welcomes the focus on employment opportunities in this proposal, however the impact and potential opportunities presented by the development on existing traffic, future transport and congestion is an important consideration. There must also be consideration of the design, height, and style</p>	
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	particularly when overlooked from Compton Down. The site is currently used for recreational purposes so an assurance that public rights of way will continue to exist as well as a plan to manage and sustain the land is important.	
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<b>Comments that object to policy E6 – retaining employment opportunities</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKHU-7 Oliver's Battery Parish Council	<p>Retaining Employment Opportunities (Policy E6)</p> <p>The proposed “considerations” where proposed development would involve the loss of existing or allocated employment land and floorspace, or land that was last used for an employment use, need to include the impact on the businesses in the remaining Local Centre if part is lost to another use.</p> <p>Also, the requirement to provide viability assessments of the sites and evidence of the appropriate marketing need to be relevant to the nature, scale and location of sites and not for town centre uses.</p>	<p>See response to identical comment above.</p> <p><b>Recommended Response:</b> No change</p>
ANON-KSAR-NKZX-V	<p>Whilst the intention of the policy is to prevent the loss of employment land and floorspace to non-employment uses, as with Policy E1 above the current wording of the policy could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises.</p> <p>It is therefore recommended that the policy be amended to include explicit support for the redevelopment of</p>	<p>Disagree, this is already covered by point i) of the policy. However, it is considered that E5 should be similarly worded and an amendment is recommended to that effect. See response under Policy E5.</p> <p><b>Recommendation:</b> No change to E6, but addition to E5.</p>

	<p>existing employment sites / premises for employment use, or simply set out that the policy only applies to the redevelopment of employment sites for non-employment uses.</p>	
<p>BHLF- KSAR- N8BD-W</p>	<p>Strategic Policy E6 - Retaining employment opportunities Objections and comments The Local Plan emphasises the need to protect existing employment land and premises, rather than allocating new sites. Paragraph 10.95 refers to adequately protecting employment land in order to support the economy and do without further employment allocations etc. The Trust objects to Policy E6 because it does not adequately protect employment land and considers that it should be strengthened and clarified if it is to retain employment opportunities. Within the policy, the clause “the potential of the site...to be developed for a mixture of uses, that include an element of employment” is too permissive as it encourages intensification on an industrial estate for non-employment use so long as it includes “an element”. This implies this could be only a token element. The Trust feels paragraph 10.97 is unclear in its intention and considers it should be re-drafted. For example:</p> <ul style="list-style-type: none"> <li>• There is an apparent double negative: “may not also not be appropriate”;</li> <li>• What does “unnecessary” increases in travel mean?</li> <li>• Why does the text imply that applications for hospitals,</li> </ul>	<p>E6 sets out a presumption against any loss of employment land/use and seeks to retain existing employment sites where realistic, assessed against a range of criteria.</p> <p>It is considered too restrictive to set a specific amount that should remain in employment use. However, it is agreed that the current wording is not positive enough.</p> <p>Regarding paragraph 10.97, the wording of the first sentence is considered necessary to highlight that the other activities discussed in the paragraph may also not be appropriate in addition to those discussed in the previous paragraph.</p> <p>Hospitals and educational establishments are referred to as examples of uses that do not generally fall within the terms of this policy, but have large travel implications.</p> <p>The text accompanying policies will be revised before publication, when minor changes such as ‘unnecessary’ can be considered.</p> <p><b>Recommended Response:</b> Amend criteria iii as follows – ‘...that include <del>an element</del> <b>a significant amount</b> of employment’. No Change.</p>

	educational establishments etc on employment land will be judged differently to those for retail and residential?	
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	<b>Recommendations</b>	<b>Officer response</b>
Comments from SA	NONE	
Comments from HRA	NONE	

## **Amendments to policy E6**

### Amendments to supporting text

All supporting text updated, final version below.

### **RETAINING EMPLOYMENT OPPORTUNITIES**

10.101 Due to high land values, and the attractiveness of the district as a location and a place to live, there are continuing pressures for the redevelopment of existing employment sites for other uses, particularly residential. Employment uses are therefore particularly vulnerable to redevelopment, and it is important to ensure they are adequately protected to support the economy of the Winchester District.

10.102 It is also important to ensure that inappropriate activities are not developed in inappropriate locations. Retail and other town centre uses that are proposed in industrial areas or on employment sites, will be considered in accordance with the sequential approach set out in Policy E4 above. Residential development is unlikely to be appropriate within general industrial areas.

10.103 Other forms of redevelopment may not also not be appropriate in employment locations where they do not support the spatial strategy of the plan, or contribute to an increase in unnecessary travel contrary to sustainable travel goals and efforts to reduce carbon emissions. Examples of this may include activities that have large travel implications, such as hospitals, educational establishments. There are a number of existing employment uses on sites within the countryside. These comprise an important component of local employment opportunities across the district and should also be retained where appropriate.

10.104 This policy sets out criteria against which changes of use from established, or allocated employment land and premises should be assessed. This also applies to land or buildings that are currently vacant, but were last used for an employment use.

10.105 It is recognised that it may not always be appropriate or reasonable to retain employment uses and therefore this policy specifies criteria that will be used to assess the merits of changes of use.

10.106 The ETCUS recommends retaining existing employment sites, the onus will be on applicants to demonstrate why that would not be reasonable or practical in any particular case. Policy E6 sets out a number of criteria that will need to be satisfied. It is recommended that applicants approach the council in advance of submitting applications to agree the scope of supporting evidence that will be necessary to determine the application.

10.107 The criteria set out in Policy E6 requires exploring the possibilities of using the premises or site for alternative employment uses in the first instance. This will usually include the submission of viability assessments and details of marketing undertaken to demonstrate that the existing or an alternative employment use would not be practical or viable.

10.108 The exercise should be able to demonstrate that the price and terms on which the land or premises were marketed were reasonable by comparison with similar examples in the local area. Information should be provided detailing any interest received from potential buyers or tenants since the marketing commenced. Where interest has been received and that interest has not been pursued, this must be documented and submitted with the planning application.

10.109 Proposals should consider the possibilities for relocation of any current businesses on the site. The terms on which any current, or recent occupiers have been offered in relation to the site will form part of the consideration of the proposal.

10.110 Occasionally, it may be desirable for sites not to continue in their current use on grounds of amenity or adverse traffic impacts or other environmental grounds. In these cases, the possibility of alternative employment uses should be considered in the first instance, having regard to the spatial strategy of the Local Plan.

10.111 Proposals that involve the loss of other activities and uses that provide employment, but do not fall within employment uses as defined in Policy E5, will be considered on their own merits, taking into account the overall benefits of the new development compared with the existing use and assessed against the general policies of the plan.

### **Policy E6 Retaining Employment Opportunities**



Proposals that involve the loss of existing or allocated employment land and floorspace, or land that was last used for an employment use, will only be permitted where it can be demonstrated that continued employment use is no longer practical or viable, taking account of the following considerations:

- i. The redevelopment potential for other employment uses including the scope for intensifying or providing an effective use of the site or building, and the potential to improve and extend the range of modern employment floorspace;
- ii. Whether the building or use meets, or could meet, a specific local business requirement - such as providing low cost start up accommodation;
- iii. The potential of the site or building to be developed for a mixture of uses that include ~~an element~~ **a significant amount** of employment';
- iv. The impact of continued employment use on the local environment and amenity;
- v. The suitability of access arrangements for the site/buildings, by road and public transport;
- vi. The benefits of the proposed use compared to the benefits of retaining the existing use.

Proposals that involve a loss of employment use will be expected to demonstrate that the factors set out above have been satisfactorily addressed.

As part of the assessment of proposals, applicants will be expected to provide viability assessments of the sites and evidence of the appropriate marketing of sites for potential employment uses. Marketing should be undertaken for a minimum of at least 12 months.