

*The Independent Voice of Local Business*.....

SOUTHAMPTON & FAREHAM CHAMBER OF COMMERCE & INDUSTRY

SUMMARY OF COMMENTS  
ON GOVERNMENT'S PROPOSED CHANGES  
TO THE SOUTH EAST PLAN – October 2008

**A) CHANGE NUMBER:- Chapter 4 (7) -SUPPORT with amendment - Policy SP2  
Regional Hubs - Clarification of Southampton's designation as a Growth Point**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports the inclusion of a new chapter on spatial strategy, which clarifies the designations of Hubs in a "HUBS" table. However we would like to see Southampton indicated along with Portsmouth as a Growth Point in the HUBS table and specifically mentioned in the supporting text. This will mean that the Growth Points in the table total 7 and not 6 as at present without Didcot, which is not a hub.

**Suggested amendment to supporting text and change to HUBS table:** At 4.10 in the new supporting text listing the seven Growth Points announced in October 2006, insert in brackets "(Portsmouth & Southampton)" after "South Hampshire" and amend the HUBS table to show a dot in the Growth Point column next to Southampton, as already shown next to Portsmouth.

**B) CHANGE NUMBER:- Chapter 16 (2) –SUPPORT and comment Policy SH1  
Rate of Infrastructure Provision and Implementation of development.**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports the deletion of final sentence of Policy SH1 "The scale and pace of land release for development will be related to the rate of economic growth taking place across the sub region and to the provision of new infrastructure." The Chamber is satisfied that the new last Chapter 26 added to the Plan on "Implementation, Monitoring and Review" **and the new SH9 added to the South Hampshire section means** the Plan now contains references to the controlled rate of land released for development. Under Chapter 26 (3) it refers to the creation of a Regional Infrastructure Fund and a separate non-statutory Regional Implementation Plan to be produced and updated by the Regional Planning Body.

**Expanded comment:** The Chamber's view is consistent with its position on Infrastructure and Implementation at the Examination Panel, which was that the Plan should not specify that business expansion be held back until the government provides funds for related works, particularly if the RSS is to be driven forward by increases in economic activity.

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**C) CHANGE NUMBER:- Chapter 16 (7) –SUPPORT Deletion of submitted SH5  
Rate of Greenfield Land Release - SUPPORT New Policy SH9  
-SUPPORT new Chapter 26.**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports the deletion of submitted Policy SH5 on Plan, Monitor and Manage and notes the inclusion of a new last Chapter in the Plan, Chapter 26 “Implementation, Monitoring and Review” which proposes that a non-statutory Regional Implementation Plan prepared by the Regional Planning Body. The Chamber hopes that this Regional Implementation Plan, together with the new Implementation Agency suggested for South Hampshire (new policy SH9), will enable additional employment land and associated infrastructure to be brought forward either in advance of need or to meet the requirements of local focus and the expanding economy.

**D) CHANGE NUMBER:- Chapter 16 (23) - SUPPORT New Policy SH9  
Establishment of an Implementation Agency for South Hampshire**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports the inclusion of the new Policy SH9 and the establishment of an Implementation Agency for South Hampshire led by PUSH but with democratic accountability to co-ordinate infrastructure provision and implement the strategy for South Hampshire. This includes aligning pace of development with infrastructure provision and management, monitoring economic growth, labour supply, house building. The Chamber would hope to see improved input by the South Hampshire business community to this new Agency and would wish to be involved in such input.

**E) CHANGE NUMBER :- Chapter 16 (6) -SUPPORT Deletion of submitted SH3  
Strategic Gaps - SUPPORT provision of a new policy**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports deletion of submitted policy SH3, which designated a list of 7 sub-regional gaps. We would like to see critical examination of the different ways settlement identity can be achieved and where it is desirable.

**Suggested amendment – new policy needed:** We would like to see a revised policy included that would examine the alternative approach of integrity and identity of settlements and not the gaps between them. Many existing gaps are, in fact, next to existing urban structures and so should be used in preference to other less sustainable locations or protected by landscape/countryside policies on merit.

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**F) CHANGE NUMBER :- Chapter 16 (8) –SUPPORT Recommended Policy SH3 Scale, Location and Type of Employment Development.**

**Proposed Change and why we support it:** The Southampton & Fareham Chamber of Commerce supports the final inclusion of reference to the South Hampshire Strategic Employment Area in recommended policy SH3 and particularly reference to the necessary transport interventions at the South Hampshire Strategic Employment Area, which is the largest employment site in South Hampshire at 130 ha.

**Comment on floor space estimation and distribution:** The Chamber has already expressed criticism of this “top down” policy driven statistical approach based on GVA 3.5% pa growth by 2026, rather than on a “bottom up” analysis of the firms with growth potential and their need for land. Therefore, we would support a periodic refinement of these distribution figures based on a factual analysis of input from businesses.

**G) CHANGE NUMBER;- Chapter 16 (21) –OBJECT Recommended Policy SH8 Environmental Sustainability – energy efficiency in new developments.**

**Proposed Change and why we object to it:** The Southampton & Fareham Chamber of Commerce objects to the deletion of all reference in recommended policy SH8 to energy efficiency standards in buildings (BREEAM) when, in fact, rating against the Code for Sustainable Homes has been mandatory for new homes since May 2008. To achieve national policy on combating climate change, we need sub regional level targets which are supported by planned action via Development Plan Documents.

**Suggested amendment:** We recommend the inclusion of a bullet point (iv) in policy SH8 to refer to the new mandatory Code for Sustainable Homes as detailed under policy CC4, which has now replaced the BREEAM standards. Similarly we object to the deletion of all reference in recommended policy SH8 to energy generation targets by new developments and we recommend inclusion of a bullet point (v) in policy SH8 to refer to micro-generation targets and the interim sub regional targets for land based energy generation under policies NRM14 and NRM 16.

**H) CHANGE NUMBER:- Chapter 6 (7) -SUPPORT Recommended Policy RE3 Employment and Land Provision – Key Marine industry sites**

**Proposed Change and why we support it:** Southampton & Fareham Chamber of Commerce welcomes the new reference to SEEDA’s Waterfront Strategies and supports the specific inclusion of key sites of importance to the marine industry being safeguarded in relevant Development Plan Documents, but we would like to see similar safeguarding relating to the specialist nature of marine industries not attached specifically to the waterfront. We would also like provision made to protect sites out of flood reach and suitable for the on-shore infrastructure needed to connect to off shore generation of electricity by tide, wave or wind. (NRM 14, 15 and 16).

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**I) CHANGE NUMBER:- Chapter 8 (34) –SUPPORT Recommended Policy T10  
Ports and Short Sea Shipping**

**Proposed Change and why we support it:** - Southampton & Fareham Chamber of Commerce supports the new emphasis on the important national role of Southampton Port which is now designated as a major international deep sea port with significant global and economic importance and which is now listed first of 6 ports.

**J) CHANGE NUMBER:- Chapter 16 (19) –OBJECT Recommended Policy SH7  
Sub Regional Transport Strategy**

**Proposed Change and why we object to it:-** Southampton & Fareham Chamber of Commerce objects to the failure to include a reference to the Chickenhall Link Road. This new road is a critical success factor for the South Hampshire Strategic Employment Zone - SHSEZ – listed with the other two SDAs.

**Suggested amendment:** Under “key issues to be addressed” at the end of Policy SH7, the bullet point on the SDAs should make reference to the South Hampshire Strategic Employment Zone as well, to read “Access to SDAs at North Fareham and Hedge End, the South Hampshire Strategic Employment Zone.”

**K) CHANGE NUMBER:- Chapter 16 (4) –OBJECT Recommended policy SH2  
Strategic Development Areas SDAs**

**Proposed Change and why we object to it:-** Southampton & Fareham Chamber of Commerce objects to the failure to include a reference to the Eastleigh Chord rail connection on the justification cited that a general reference to improving transport links to Southampton is included in the proposed revised text. The Eastleigh Chord will also improve rail services via Hedge End rail station for the SDA north of Hedge End. Also, specific mention is made under critical success factors for the Fareham SDA of the fast bus based service between Portsmouth, Gosport and Fareham, so there should be no reason for not specifically mentioning the Eastleigh Rail Chord for the Hedge End SDA.

**L) CHANGE NUMBER:- Chapter 8 (32) - SUPPORT Policy T9  
Southampton Airport**

**Proposed Change and why we support it:-** Southampton & Fareham Chamber of Commerce welcomes Southampton airport being treated as a local regional hub in its own right and welcomes the emphasis on the need to improve surface access.

Jimmy Chestnutt  
Director General

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## ABOUT US

*Your regional Chamber working for you locally*.....

As the independent voice of local business, Southampton and Fareham Chamber of Commerce is able to represent some 2,000 businesses in the South Hampshire region concerning the issues that affect their ability to grow and prosper. Their views are central to the Chamber's lobbying on issues of concern to our members and are the basis of our thinking on the many local, regional and national planning or government policy initiatives on which we are asked for formal comment as a business representative organisation. The volunteer Chamber members on the committees provide expertise and a wide knowledge of specialist topics. This is of great help in formulating the **Chamber Viewpoint**, which is published monthly in the centre pages of our magazine and on our web site.