



CH/MH/HP13023

Date 5 January 2015

Claire Jones-Hughes  
Programme Officer  
c/o Banks Solutions  
6 Brading Road  
Brighton  
BN2 3PD

Dear Ms Jones-Hughes

**FAREHAM BC DEVELOPMENT SITES & POLICIES: ACTIONS ARISING FROM HEARINGS  
ISSUE 4: EMPLOYMENT (INCLUDING DEVELOPMENT SITE BRIEFS) (DSP17-DSP19)  
WYG FOR MR GRAHAM MOYSE (LAND NORTH OF JUNCTION 11 OF M27)  
RESPONDENT REF: DREP389**

I refer to the above matter, and confirm that this response provides additional points to those previously submitted through the representations and hearing statement made on the Publication and Submission versions of the Fareham Local Plan Part 2.

Question 1 – Council to set out the role of the Solent Strategic Economic Plan and the Marine & Maritime Supplement and how these have been taken account of in LP2. Council to add both documents to the Library of submission documents

The Solent Strategic Economic Plan is an important economic document that forms part of the evidence base in the formulation of the Local Plan Part 2. The Solent SEP March 2014 identifies a number of 'strategic sectors and clusters', including advanced manufacturing, engineering and transport and logistics that require B2 and/or B8 floorspace. In particular, the Solent SEP identifies a potential shortfall of 4 million square feet of warehouse and distribution space in South Hampshire. This shortfall needs to be met by all local authorities within the PUSH area, especially boroughs such as Fareham that has sites immediately adjacent to key motorway junctions that can serve the two principal centres of Southampton and Portsmouth.

The Fareham Local Plan Part 2 is not making adequate additional provision to address this shortfall, and therefore the Plan is not being positively prepared in accordance with Paragraph 21 of the NPPF, which states that Local Plans should *"Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances"*.

My client's site at Land North of Junction 11 of the M27 provides a suitable, available and viable employment site and this site should be allocated for employment uses.





### Question 3 – Council to provide further clarity on its approach to Open Storage uses in LP2

There is a lack of available sites within the Borough to provide open storage uses. At the Examination, we highlighted the deliverability issues with bringing forward Little Park Farm over the development plan period, due to the access constraints, and the unsuitability of Midpoint 27 for open storage uses.

At Little Park Farm, it is likely that a lower density industrial scheme would be developed longer term, given the substantial financial investment required to assemble the site, including the Shared Value Agreement with Network Rail to alter the bridge. This is demonstrated by the proposal to build 211,786 sq.ft. of industrial floorspace on the site.

We understand, from Lambert Smith Hampton that Midpoint 27 is currently under offer, and is due to be built out for new industrial uses on the developable part of the site, which is approximately 2 acres.

In terms of demand, Lambert Smith Hampton has confirmed to us that a significantly higher number of open storage enquiries are received for sites around the Docks and close to the Southampton and Portsmouth conurbations, as opposed to the Segensworth industrial area. This is due to a number of issues including shorter drive times, ease of servicing local customers, staff retention and more attractive values. Junction 11 would be an attractive site for both open storage and general industrial development, given its proximity to Portsmouth and the strategic road network.

Moreover, my client has received a number of enquiries from businesses seeking employment space and identifying land at Junction 11 of the M27 as an ideal business location. This evidence is appended to our representation and demonstrates market demand for my client's land.

### Question 6 – Council to provide further justification for the allocation of Little Park Farm and Solent 2 for employment use

Little Park Farm has been allocated as an employment site since June 2000 within the Fareham Borough Local Plan Review and therefore has not been implemented in 14.5 years i.e. nearly a full development plan period. The lack of implementation raises serious questions about the site's proposed allocation within the Local Plan Part 2, especially in light of Paragraph 22 of the NPPF, which states that *"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose."*

The letter provided by Southern Planning Practice at Appendix 1 of the Council's response (DCD-22) only reinforces the position that a Shared Value Agreement has yet to be entered into between the landowners and Network Rail, and this Agreement is likely to take a considerable amount of time. The short term option (Option B) to retain the existing bridge is only likely to appeal to occupiers seeking a short term let, and those businesses that can operate with the restrictions of the current railway bridge arch. Indeed, if open storage uses are temporarily allowed on the site, at some point in the future, these are likely to be displaced, when higher value uses are constructed on the site (211,786 sq.ft. of built form is proposed). This would create a requirement for additional land for open storage uses during the development plan period, which in turn provides clear justification for additional employment allocations.

The timescale for the delivery of the comprehensive option (Option A) continues to change. Previous correspondence by Forbisher Developments Ltd (See Appendix 1 to DSP Statement on Issues and Questions Issue 4, October 2014 DCD-08) sets a date of commencing development during 2013/14. However, the Fareham Employment Study 2014 by Wessex Economics mentioned a commencement date of 2016. More recent representations indicate that Option A would be implemented in 2018 and project



completion by 2020. These changing dates clearly demonstrate that the delivery of this complex site continues to be a protracted process, with no guarantee that Option A will eventually be implemented.

In accordance with the economic role of sustainable development under Paragraph 7 of the NPPF, we do not believe that the proposed Local Plan Part 2 is positively prepared to ensure that "*sufficient land of the right type is available in the right places and at the right time to support growth and innovation*". My client's site is large enough to meet employment needs; is located in the right place, adjacent to a strategic motorway junction; and can be delivered at the right time i.e. in the short term. The allocation of this site would provide flexibility to ensure that deliverability issues with other sites in the Borough do not create 'pent up' demand in the industrial market and stifle economic growth.

The land at Junction 11 has not been subject to a Sustainability Appraisal as part of the Local Plan Part 2 process, and any comments made by the Council in the DSP Statement on Issues and Questions Issue 4, October 2014 (DCD-08) should be disregarded until a new up-to-date appraisal has been undertaken to assess the site within the context of the employment requirements of the Local Plan Part 2.

### Summary

There is clear evidence within the Solent Strategic Economic Plan that the provision of additional employment land is required by local authorities within the South Hampshire area to address the shortfall in the warehouse and distribution sector. Within Fareham Borough, there is unmet demand as evidenced by the examples provided. Moreover, the allocation of Little Park Farm is questionable, given the lack of delivery over the past 14-15 years and the site constraints. The Council should provide greater flexibility in the choice and location of employment sites in accordance with Paragraphs 7 and 21 of the NPPF, especially as sites for open storage uses are not readily available. My client's site to the north of Junction 11 of the M27 is therefore an appropriate employment site that should be allocated within the Local Plan Part 2.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin Hawthorne'.

**Martin Hawthorne**

**Director**

For and on behalf of WYG

cc. Graham Moyse  
Ian Judd







**Pro Mech Limited**

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07 January 2015

Graham Moyse  
Downbarn Farm  
Boarhunt Road  
Fareham  
Hampshire PO17 6AJ

Dear Graham

**Land At Junction 11, M27**

As you know we occupy premises with a yard in Spurlings Industrial Estate. Our existing building is just about satisfactory at the moment but we badly need further land for open storage in order to grow our business. We need open storage land of at least one acre.

Our existing site has good access to the M27 motorway which is essential for the operation of the business which requires good road access to the Portsmouth and Southampton areas and the whole south coast corridor and the A3 and M3 corridors. The open storage land we need needs to be in close proximity to our existing workshop and yard as well as giving good access to the M27. A site at Junction 11 would be ideal.

We have looked at what other limited sites are available in the Fareham area but there are non available or suitable for our needs.

If you able to obtain the necessary planning consents then we can confirm that we would be very keen to take on a site at Junction 11.

Kind regards

A handwritten signature in blue ink that reads "J. Cooper".

John Cooper