

FAREHAM
BOROUGH COUNCIL

Development Sites and Policies Plan

Statement on Issues and Questions

Issue 4– Employment (including Development Site Briefs)
(DSP17-DSP19)

October 2014

DCD-08

4.1 Are all the employment policies and proposals consistent with national guidance?

4.1.1 The Council considers the employment policies and proposals to be consistent with national guidance. Economic Growth is a key commitment of the NPPF, and paragraph 21 sets out a list of requirements that Local Planning Authorities are expected to deliver in drawing up Local Plans. This includes setting a clear economic vision for the growth in the area, allocating sufficient sites and supporting growth in business sectors.

4.1.2 The economic vision for the Borough is set out in the Core Strategy (Local Plan Part 1), which is complemented by the DSP Plan. The CS includes an overall vision for the Borough, which states (paragraphs 3.3 and 3.4) that *“The Borough will accommodate significant levels of development. It will take into account climate change and the key sub regional objective of increasing economic prosperity within South Hampshire and the need to strengthen Fareham’s key role within in. Fareham Borough will have a strong and diverse economy and the highly skilled workforce will have well-paid and permanent jobs.”* This is supported by Strategic Objective SO3 (page 15) which is *“to deliver a sub regionally important strategic employment site at Daedalus Airfield and provide a range of other employment opportunities to enable companies to both expand and locate within the Borough, including locally important clusters, whilst maintaining and improving workforce skills and maintaining low levels of unemployment”*.

4.1.3 In terms of allocating sites, the DSP Plan seeks to deliver the level of growth set out in the Core Strategy (Policy CS1, page 20), which seeks to deliver 41,000sq.m of net additional floorspace. The Plan also demonstrates that there are sufficient sites within the Borough to meet the targets set out in the 2012 South Hampshire Strategy Review (DPH01) (100,000sq.m), which were subsequently reinforced by the findings of the 2014 Wessex Economics Employment Study (DED01). The Employment Study (DED01) showed a need for 100,100sq.m of employment floorspace in the Borough by 2026, in order to provide for predicted population growth. By allocating sufficient employment land to exceed the targets from the Employment Study (DED01), which are higher than the original CS targets, the Council is meeting the NPPF requirement to plan proactively and to meet anticipated needs over the Plan period.

4.1.4 Flexibility is a key principle in the NPPF and this is reflected in the DSP Plan within Policy DSP17, which permits changes of use between different economic development uses in existing employment areas. Flexibility is also provided through Policy DSP18 and the allocations by not providing a specific capacity “target” for each site and by not being overly prescriptive about the type of uses that will be permitted. This is discussed in more detail in answer to Inspector’s Question 4.4.

4.1.5 The NPPF (paragraph 22) states that planning policies should *“avoid the*

long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.” The Council produced an Employment Land Review (DED02) in late 2013, which considered all the existing employment sites and areas across the Borough, including sites that were allocated in the Local Plan Review (2000) (DLP01), but also a number of sites that were not. The Employment Land Review (DED02) considered the suitability of these existing sites against a pre-determined set of criteria to understand their suitability for offices and industrial/warehousing. This process included such criteria as access, neighbour issues, site prominence and character, and is set out in full in the Employment Land Review Appendix (DED02a, pages 3-4). Where it was clear that certain sites were not suitable for long term protection for employment uses, they were not allocated for such uses in the DSP Plan.

- 4.1.6 The Employment Land Review (DED02) also considered the suitability of potential allocation sites, and were judged against a similar set of criteria as existing sites and areas. Only sites that were shown to be suitable for future employment development were allocated as new employment allocations. This work was also further supported by information in the 2014 Employment Study, which was undertaken by Wessex Economics (DED01). The Employment Study (DED01) considered some of the proposed allocation sites, providing detailed commentary on the deliverability of these sites. The suitability and deliverability of each of the employment sites is discussed in more detail in response to Questions 4.5, 4.7 and 4.9 of this Statement. Where evidence showed certain sites or areas were unlikely to deliver a net growth in employment floorspace, like Fareham Town Centre, these were not included in the supply detailed in the Plan.
- 4.1.7 The Council’s approach to allocating existing and proposed employment sites based on the suitability is in accordance with NPPF paragraph 22. It ensures that only those sites that are considered to have a reasonable prospect of being in employment use over the Plan period are allocated.
- 4.2 *Has the Council attached appropriate weight to the findings of the Fareham Employment Study – Final Report (Jan 2014)?***
- 4.2.1 The findings of the Employment Study undertaken by Wessex Economics in 2014 (DED01) have been fully taken into account in the production of the Publication and Submission versions of the DSP Plan, with appropriate weight attached. The Study represents an up-to-date assessment of employment needs in the Borough, as well as an assessment of potential strategic sites and is thus a vital part of the Council’s economic development evidence base.
- 4.2.2 Confusion may have been caused by the wrong date being referenced in the supporting text in paragraph 5.5, the footnote on page 41 (footnote 56) and paragraph 5.23. These sections of the Plan referred to 2013, even though the publication date of the study was January 2014. Corrections to

these sections have been proposed as minor modifications in the Schedule of Minor Changes to Fareham Borough Local Plan Part 2: Development Sites & Policies Plan Publication Version (DSD02).

- 4.3** ***a) The Core Strategy includes a requirement for 41,000 m² of employment floor space between 2006 and 2026 (policy CS1). The Employment Study (2014) recommends a requirement of 100,000 m² for 2011 to 2026. Five sites are allocated for employment in policy DSP18 but although the Development Briefs for those sites identify the site area, there is no reference to floor space provision. Is the Council's approach sufficiently clear and will decision makers know how to react to a development proposal?***
b) If not how should it be clarified?
c) What is the reasoning behind the categorisation of employment sources as set out in Table 3 (paragraph 5.7)?

a) The Core Strategy includes a requirement for 41,000 m² of employment floor space between 2006 and 2026 (policy CS1). The Employment Study (2014) recommends a requirement of 100,000 m² for 2011 to 2026. Five sites are allocated for employment in policy DSP18 but although the Development Briefs for those sites identify the site area, there is no reference to floor space provision. Is the Council's approach sufficiently clear and will decision makers know how to react to a development proposal?

4.3.1 The DSP Plan seeks to deliver the Core Strategy target of 41,000sq.m, but also demonstrates that there is a sufficient supply of employment land to meet both the target in the 2012 South Hampshire Strategy (DPH01), and the more recent evidence in the form the Wessex Economics Employment Study (DED01).

4.3.2 The majority of the sites that make up the Council's employment supply already have the benefit of planning permission. The largest contributor to supply is Daedalus (Solent Enterprise Zone), which was allocated as a Strategic Employment site in the Core Strategy and has subsequently been given outline permission for the whole site, as well as a number of full permissions on individual parcels within the site, with a number of buildings now commenced or completed. Three of the five site allocations also have extant planning permissions (E1, E4 and E5).

4.3.3 What this demonstrates is that the majority of the employment floorspace supply is provided through commitments. Only two of the allocations do not currently have planning permission (Little Park Farm and Kites Croft), and these are estimated to deliver around 14,000sq.m (as shown in Table 3), which is around 10% of overall supply.

4.3.4 The DSP Plan acknowledges that there is a potential shortfall in the amount of B1 floorspace required in the Wessex Economics Employment Study (DED01). However, as Table 3 of the DSP Plan (page 44) demonstrates

there is predicted to be an overall surplus of employment floorspace across the use classes, which includes a significant supply of B1-B8 floorspace, where the exact use has not been prescribed (more detail on this use type is explained in paragraphs 4.3.6 to 4.3.8). The Policies in the DSP Plan are flexible in allowing changes between uses, reflecting on the National Planning Policy Framework. The Council is satisfied that the strategy for economic development set out in the DSP Plan will allow for sufficient levels of employment floorspace, including B1, to meet market demand.

b) If not how should it be clarified?

4.3.5 The Council does agree that an indicative capacity floorspace for each of the allocations, including those with permission, would provide extra clarity. Therefore, the Council proposes a set of minor modifications to add “& Indicative Floorspace Capacity” to the “Potential Use” row in each Employment Site Development Brief, which is the same format as the Housing Site Briefs. The Council is also seeking a minor amendment to clarify that Midpoint 27 does have an extant planning permission. The changes to each of the Briefs is set out below:

Employment Site E1: Solent 2

Potential Use & Indicative Floorspace Capacity	Employment <u>floorspace</u> (B1, B2 or B8) of approximately <u>23,500sq.m</u>
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Employment Site E2: Little Park Farm

Potential Use & Indicative Floorspace Capacity	Employment <u>floorspace</u> (low intensity B1, B2 or B8) of approximately <u>11,200sq.m</u>
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Employment Site E3: Kites Croft

Potential Use & Indicative Floorspace Capacity	Employment <u>floorspace</u> (B1, B2 or B8) of approximately <u>3,000sq.m</u>
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Employment Site E4: Midpoint 27, Cartwright Drive

Planning Status	None <u>Extant permission for B1-B8 floorspace</u>
Potential Use & Indicative Floorspace Capacity	Employment <u>floorspace</u> (B1, B2 or B8) of approximately <u>4,000sq.m</u>

Employment Site E5: The Walled Garden, Cams Hall

Planning Status	Extant permission for <u>1,843sq.m</u> of B1 floorspace
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Potential Use & Indicative Floorspace Capacity	Employment <u>floorspace</u> (B1) <u>of approximately 2,000sq.m</u>
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c) What is the reasoning behind the categorisation of employment sources as set out in Table 3 (paragraph 5.7)?

- 4.3.6 Table 3 has a separate column for general employment use (category B1-B8). This reflects a number of permissions that have been given for economic development uses that do not specify the exact use class, allowing flexibility between different economic development uses. This also reflects the fact that on some of the allocations the Council is not being overly-prescriptive on the type of economic development uses that will be permitted.
- 4.3.7 This approach is supported by the NPPF, which requires (paragraph 21) policies to be *“flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”* Being overly-prescriptive of uses could act as a barrier to economic growth, especially in growth industries that are not predicted in current evidence.
- 4.3.8 This approach also recognises that modern working arrangements mean that employment sites and areas now cover a variety of use classes, with some sites include an element of offices, manufacturing and storage in the same building. The approach taken by the Council reflects this move towards more flexible arrangements and allows for a natural mixes between uses.
- 4.4 Is policy DSP17 sufficiently flexible and reflective of the advice in the NPPF (e.g. para 22)?**
- 4.4.1 Flexibility is a key part of the NPPF’s overall approach to building a strong, competitive economy. This is set out in the bullet points in paragraph 21 as well as paragraph 22. The Council believes that Policy DSP17 adequately reflects the wording of the NPPF, and incorporates sufficient flexibility.
- 4.4.2 The defined sites and areas allocated in Policy DSP17 have been fully assessed in the Employment Land Review (DED02), and only those deemed to be suitable for continued employment uses have been protected. This adheres to NPPF paragraph 22, which seeks to *“avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”*.
- 4.4.3 The Policy allows these defined existing employment sites and areas to expand and intensify, as well as changes of use between different uses that contribute towards economic development in these sites and areas. This allows for suitable economic growth, but also reflects the NPPF desire for

flexibility between uses. The NPPF is clear that policies should be “*flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in circumstances*”. By allowing changes between different economic development uses on existing sites the Plan ensures that growth in certain sectors, that may not be B uses, will not be unnecessarily stifled or restricted.

- 4.4.4 The Policy does provide a caveat that changes between different economic development uses in existing employment sites and areas should provide similar quality and quantity of jobs. This focus on job numbers reflects the growth aspirations of the sub-region and the overall strategy set out in the Core Strategy. Strategic Objective SO4 places emphasis on maintaining low levels of unemployment and thus Policy DSP17 has been developed with increasing overall job numbers in mind. Whilst the Council acknowledges that there are a wide variety of uses that can contribute towards economic development, some inevitably provide more jobs than others. To that end, the Council considers it necessary to ensure that when considering changes between economic development uses, job numbers continue to be a key consideration. Ignoring this issue could, potentially, lead to the replacement of uses that provide high levels of jobs with low density uses, resulting in lower overall job numbers in the Borough, decreasing job opportunities for residents.
- 4.4.5 The Policy does clarify that there are a number of “main town centre uses” which also contribute towards economic development. The NPPF emphasises that “main town centre uses” should be focussed into existing Centres to retain vitality and viability. Therefore Policy DSP17 includes a necessary caveat which cross-references Policy DSP37 Out-of-Town Shopping and the requirements for sequential and impact assessments (where necessary).
- 4.4.6 The final part of the Policy covers losses of employment floorspace where it can be demonstrated that a site is not “fit for purpose” or where a unit has been vacant for twelve months. This allows the Council to react to changes in circumstances on individual sites, but also changes in market demand over time. This part of the Policy coincides with the latter part of NPPF paragraph 22 which states that “*where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals*”.
- 4.4.7 The Council will review the delivery of employment floorspace through Annual Monitoring Reports and future iterations of the Employment Land Review. This will highlight the direction of the market and will allow the Council to react to any unforeseen issues. Employment floorspace needs and allocations will be reviewed as part of the committed Local Plan Review, following the revision of the South Hampshire Strategy.
- 4.4.8 The Council’s commitment to an to an early review of the Local Plan is also proposed to be emphasised in a modification paragraph 1.11 to the

submission version of the Plan as follows:

The Council's commitment to an early review of the Local Plan is reiterated in the Local Development Scheme. The Council is committed to review the Local Plan, and this is set out in the Local Development Scheme (Revised September 2014), which was agreed at Fareham Borough Council's Executive Meeting on the 1st September 2014. The Council's timetable for the Local Plan Review allows the Authority to take account of the current review of the South Hampshire Strategy. The timetable for the review of the Local Plan is as follows:

- Summer 2016 – Consultation on draft Local Plan (Regulation 18)
- Summer 2017 – Publication of pre-submission Local Plan (Regulation 19)
- Autumn 2017 – Submission to Secretary of State (Regulation 22)
- Winter 2017 – Examination (Regulation 24)
- Spring/Summer 2018 – Adoption (Regulation 26)

The Local Plan Review undertaken by the Council will be comprehensive in nature, updating and reviewing the adopted Core Strategy, Development Sites and Policies and Welborne Plans, to form one Local Plan.

4.5 *What is the justification for the allocation of the Solent 2 site for employment uses and is it reasonable? Is paragraph 5.23 of the plan factually correct?*

4.5.1 The Solent 2 site is considered to be an integral part of the Borough's overall employment land supply. Unlike other currently available employment sites in the sub-region Solent 2 has potential for both B1 and/or B2/B8 uses. Table 3 in the DSP Plan shows, the Council has a potential deficit (4,600sq.m) in office floorspace against the requirements derived in the 2014 Wessex Economics Employment Study (DED01). Given that Solent 2 has an outstanding permission for B1 floorspace, of which around 16,000sq.m is for offices, this is the single largest potential supplier of office development in the Borough. Without the office floorspace predicted at Solent 2, the Council would have a significant undersupply of office floorspace over the Plan period, and would need to identify additional sites to compensate.

4.5.2 The Council believes that the Solent 2 site is eminently deliverable, being well located, and relatively prominently positioned, adjacent to junction 9 of the M27. The site is located to the west of the wider Solent Business Park, which is located mainly in the boundary of Winchester City Council. To the south of the motorway junction is the Borough's largest employment area, Segensworth, which helps to make Junction 9 of the M27 a core employment hub for the sub-region. The Employment Study (DED01) (page 38) confirmed that "*market perception is that this location is good for employers*", although it did note concern over peak time congestion.

- 4.5.3 The wording of the NPPF (paragraph 22) is clear that Local Plan's should *"avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose."* Whilst the Council is aware that there has been some marketing of the site since permission was originally granted for the wider Solent Business Park, the location of Solent 2, on the outskirts of the Business Park, ensured it was always likely to be one of the latter parcels to be developed. The recent recession is also a major factor in the lack of development on site, with the dual impact of not only ensuring limited market interest in employment across the Country, but also causing higher than average vacancy rates in existing built employment stock elsewhere, including the rest of Solent Business Park and Segensworth. The "knock on" effect is that even as the market starts to recover it is often these excess vacancies that are the first option to be taken up, before greenfield sites such as Solent 2.
- 4.5.4 Taking the above into account, the Council remains convinced that there is a reasonable prospect in the site being developed over the Plan period for employment uses. The Employment Study (DED01) concludes (page 43) that *"the prospects for development (for Solent 2) before 2026 are reasonable but depend on the improvement in economic conditions, and the market for business space."* It also states (page 43) that *"if the South Hampshire economy really picks up and significant occupier requirements materialise, the Fareham part of Solent Business Part 2 might come into its own"*. The landowner contends that market interest in the site has been limited in previous years, but the Council is aware that there has been market interest from potential occupiers more recently.
- 4.5.5 The Employment Study (DED01) advises caution in releasing such a key employment site for other uses, given that it is unclear how patterns of demand will manifest themselves in the recovery stage. The Council is aware that there are currently very few currently available sites, such as Solent 2, on the market for companies looking to develop their own, bespoke units. With the site being a unique, and key, part of the employment floorspace supply, and thus a significant contributor to the growth of the Borough's economy over the Plan period, the Council considers the allocation of the site for employment uses as both reasonable and justified.
- 4.5.6 The Council believes the wording in paragraph 5.23 is factually correct as the site does have an outstanding permission for around 23,500sq.m of B1 floorspace. Whilst it is acknowledged that some of this floorspace is B1(a) and some is B1(c) it is still under the wider umbrella of B1 use.
- 4.6 ***What evidence is there, of consideration of cross-boundary employment issues between Fareham BC, Winchester CC and Portsmouth CC particularly with regard to the need to allocate land at Solent Business Park?***

- 4.6.1 The Council continues to work with neighbouring authorities as part of the Partnership for Urban South Hampshire (PUSH). PUSH originally produced the evidence (DPH02) that underpinned the development levels in the Core Strategy, and refreshed this work in the 2012 South Hampshire Strategy (DPH01). This collaborative working involved Fareham Borough Council, Winchester City Council and Portsmouth City Council, amongst other Authorities and helps satisfy the Council's Duty to Cooperate. More information on how the Council has met the Duty to Cooperate is set out in response to Question 1.1.
- 4.6.2 The 2012 South Hampshire Strategy (DPH01) seeks to deliver over 1 million square meters of employment floorspace by 2026, the distribution of which was done with a full understanding of, amongst other things, the capacity issues in each Local planning authority boundary. The employment targets in the 2012 Study (DPH01) were ambitious for the Borough of Fareham (100,000sq.m outside of Welborne), but also for Portsmouth (150,000sq.m) and Winchester (178,000sq.m). This demonstrates that the sub-regional work took into account the need for a "City's First" approach (focussing development into the City Centres in the first instance), by promoting high levels of employment in Portsmouth, but also looked at capacity by doing the same at Winchester. The Portsmouth Site Allocations Document and the Winchester Core Strategy acknowledge the needs identified through the PUSH work. The Winchester Core Strategy also acknowledges existing commitments at Solent Business Park and Segensworth (within Winchester City Council ((CC)) boundaries).
- 4.6.3 The Council notes that there are areas of unoccupied employment land in neighbouring authorities, but these sites are needed by those authorities to meet their own identified needs. Each authority needs to proactively deliver employment to meet individual targets that, in turn, contribute towards overall sub-regional targets. Therefore, the targets for Fareham Borough are independent of the needs for Winchester CC and Portsmouth CC. It would not be, therefore, appropriate to un-allocate Solent 2 in the context of land supply outside of the Borough, as such land was a consideration in the creation of the targets in the South Hampshire Strategy (DPH01). The assertion that availability of land for additional employment development in neighbouring authorities negates the needs for Fareham to allocate sufficient sites to meet its own targets undermines the sub-regional approach taken by Fareham and PUSH.
- 4.6.4 The 2014 Wessex Economics Employment Study (DED01) considered employment development in neighbouring authorities and reflected that Solent 2 would face competition from the rest of Solent Business Park, and Lakeside Business Park in Portsmouth. However, the competition between employment areas in the sub-region is a sign of economic growth and is supported by the NPPF which seeks to achieve jobs and prosperity. The development of multiple employment sites and areas across the sub-region is to be expected in order to meet growth targets.
- 4.6.5 The delivery of Solent 2 as an employment site is not considered to

undermine the potential for economic growth in Winchester CC and Portsmouth CC. The Council has received no objection to the Plan from either Portsmouth CC or Winchester CC on the basis of re-allocating Solent 2 for employment uses. Furthermore the Council did receive a representation from PUSH (DREP 139) which supports the overall approach the Council is taking.

4.7 *Is the allocation of Little Park Farm (E2) justified? Can it be delivered?*

4.7.1 Little Park Farm was allocated in the previous Local Plan (DLP01) and has yet to be delivered. The Employment Land Review (DED02) and the Employment Study (DED01) conclude that the site suffers from access issues which could limit the level of development on site, with the Employment Study stating *“the key challenge for effective use of Little Park Farm site is that currently access is by means of a narrow lane”*. The Council has noted that some representations have questioned the delivery of the site, these seem to be based on the lack of progress on the site since the production of the previous Local Plan, rather than any new information on viability or other issues.

4.7.2 The Council has been in contact with the majority landowner throughout the development of the DSP Plan in order to ensure there is a reasonable prospect of delivery over the Plan period. The landowner was also contacted by Wessex Economics in the production of the 2014 Employment Study (DED01). The Council is aware that significant progress has been made on the land amalgamation on the site as well as progressing options on improving the access. Further detail on this is provided in Appendix 1, which is the landowners response to the draft DSP Plan, which is further referenced in their representation on the publication version (DREP234). The Employment Study notes that *“the landowner has developed detailed plans to address the access issues and has the legal rights to improve Little Park Lane”* (access road). The evidence does not conclude that the site is undeliverable because of potential constraints, but rather states (page 50) that because of its unique location away from neighbouring development, it *“has a useful part to play in the overall employment land strategy for Fareham, because it offers something different to the other sites.”*

4.7.3 In 2013, the Council received a pre-application enquiry on the site for employment uses, which showed further progress in bringing the site forward. The latest contact from the site landowners comes in the form of the representation to the Plan. DREP234 shows that the landowners consider the site to be available and deliverable over the Plan period. The Council is satisfied that there has been suitable progress made on the site to ensure that it will be delivered during the Plan period.

4.8 *What is the Council’s approach to proposals for open storage? Should it be reflected in the plan?*

- 4.8.1 Whilst open storage uses are considered to be an economic use, which contributes to the overall economic profile of the Borough, there is no requirement to specifically plan for them in the NPPF, nor has the Borough been set a specific target in the South Hampshire Strategy (DPH01). Open storage uses are classified as a “B8” use, which can also cover warehousing and distribution. The DSP Plan does plan to meet the set target for wider B8 uses.
- 4.8.2 It is noted that previously allocated “open storage” sites have been redevelopment for other purposes. However, through the flexible approach within Policy DSP17, the Council is confident that where a market exists for a certain use, proposals can, and will, come forward. The Council also considers that there is potential for part of the allocated Little Park Farm site to come forward for open storage development, given the limitations on the intensity of proposed uses, which is set out in Development Brief E2 of the DSP Plan.
- 4.8.3 The Council considers that a flexible approach to existing employment sites, and potential for open storage uses at Little Park Farm, means that open storage uses can come forward, where there is market demand. There is no strategic requirement to Plan for this particular type of B8 use through any national or sub-regional guidance or in the Council’s evidence. The result of this, is that it is not considered necessary to allocate specific sites to accommodate this open storage uses, over and above wider allocations for B8 uses.
- 4.9 ***a) Are the employment allocations based on a sound assessment of land availability and delivery?***
b) Is there any evidence that any of the sites are not viable and deliverable?
c) Can it be satisfactorily demonstrated that any of the employment sites proposed by the Council are not sound?
d) If so is there any evidence that would enable a conclusion to be drawn that the allocation of any of the following suggested sites would be sound:
- (i) Land to the north of junction 11 of the M27, Fareham (DREP389);***
(ii) Land at Pinks Hill, Wallington (DREP504) – to include open storage uses; or
(iii) Land between Southampton Road and Segensworth Road (DREP400) - also to include housing.
- Have these sites been subject to an adequate sustainability appraisal and appropriate public consultation?***
- 4.9.1 The allocations for employment land are based on a sound assessment of land availability and deliverability as set out in the 2013 Employment Land Review (DED02) and the 2014 Employment Study (DED01). The Employment Study looked to define an up-to-date position on employment

requirements, whilst the Employment Land Review (ELR) looked to show how these requirements could be delivered. The ELR (DED02) assessed all potential employment sites from the following sources:

- Uncompleted Local Plan (2000) allocations
- Town Centre sites
- District Centres
- Sites allocated in the Core Strategy (Daedalus)
- Sites promoted through the Development Sites & Policies Plan

A full list of all sites assessed as part of the most recent ELR are shown in Table 11 (page 25-26) of DED02, with further analysis on the individual on the sites available in Chapter 6 (pages 29-37). The ELR concludes with the recommendation (paragraph 7.5) of the allocation of the five sites which are allocated in the DSP Plan.

- 4.9.2 The justification of the allocation of Solent 2 (E1) is discussed in more detail in response to Question 4.5, whilst the justification of the allocation of Little Park Farm (E2) is discussed in more detail in response to Question 4.7. The remaining three allocations are relatively minor in their total capacity, with a total of around 9,000sq.m of floorspace expected to be provided across all three. However, it is important to ensure these smaller sites are allocated, alongside some of the larger allocations, to provide choice and flexibility for potential businesses looking for new premises in the Borough.
- 4.9.3 Site E3 (Kites Croft) consists of two small parcels of land that are the remaining part of the wider Kites Croft development that was permitted in the mid-1990s. The wider site has been developed over time, with the latest completions occurring in 2006. An application for around 3,000sq.m of employment floorspace (B1c, B2, B8) was permitted on the remaining parcels that form this allocation in 2008, but this permission has since lapsed, most likely due to the recent economic downturn. However, a further application has recently been received (August 2014) by the Council for 3,675sq.m of B1c, B2, B8 floorspace.¹ This evidence strongly indicates that not only is there market interest in this site, and that it is deliverable during the Plan period, but also the wider market for employment uses is improving.
- 4.9.4 Site E4 (Midpoint 27) is part of the wider Segensworth employment area, which is the largest employment area in the Borough, stretching from Park Gate to Titchfield with easy access to M27 Junction 9. The allocation is a remaining section which has yet to be completed, and is part of an outstanding outline planning permission for the wider site which is almost completely built out. The site is in a prominent location close to Cartwright Drive and is centrally located with a range of other employment related services within close proximity. The site was the subject of a pre-application enquiry related to employment development, as recently as 2012, showing that market interest in the site continues. Given the site's location and recent market interest, the Council remains convinced that

¹ <https://www.fareham.gov.uk/casetracker/casetracker.asp?a=1&public=Y&caseid=125413> (P/14/0779/FP)

there is a reasonable prospect of the site coming forward within the Plan period.

- 4.9.5 Site E5 (Walled Garden, Cams Hall) is adjacent to the wider Cams Hall employment site. Located within the grounds of Cams Hall this site is a combination of converted ancillary buildings which benefit from high speed broadband. The allocation is a walled garden to the south of the majority of employment buildings, located adjacent to the golf course. The allocation site gained a full permission for the erection of a building for office/server uses in 2004, but was approved again (with some alterations) in 2009 and again in 2011. An extension of the time limit to commence the scheme was granted in 2012, with two details pursuant applications being received in summer 2014. This demonstrates that whilst the proposals stalled in the recession years in the mid 2000's, development is progressing again and thus the site is deliverable within the Plan period.
- 4.9.6 Given the above, the Council believes it is justified in allocating all five employment allocations, with all being demonstrably deliverable within the Plan period. The Council believes these sites have been allocated based on sound evidence and has received no evidence to the contrary.
- 4.9.7 The Core Strategy, in Policy CS6, sets out a clear preference for focussing development into existing urban areas. Given that the allocated sites, together with existing permissions and the allocation of Daedalus (Solent Enterprise Zone) as part of the Core Strategy, can deliver the employment floorspace requirements for the Borough there is no justification for allocating additional sites in less preferable locations, such as greenfield sites. All three sites listed in the question are outside of the urban area boundaries and allocating them, when sufficient supply existing within the urban area, would be contrary to Policy CS6 of the Core Strategy.
- 4.9.8 Land north of junction 11 (site (i) in Question 4.9) forms part of the area of search for the North of Fareham Strategic Development Area (now known as Welborne), as described in Policy CS13 of the adopted Core Strategy (DLP02). The boundary for Welborne was then refined through a process of considering options for how the vision for Welborne could be achieved as a deliverable development. These alternatives related to the public consultation that was undertaken in July 2012, known as the 'options consultation' (DLP14) and were subject to a high level sustainability appraisal, as set out in the Sustainability Appraisal Options Assessment for the Draft Welborne Plan (DLP13). A summary of the assessments undertaken on these various options can be found in Appendix B of the Draft Welborne Plan (DLP13). In that appraisal, Masterplan/Transport options 1 and 2 included land proposed in representation DREP389 as part of an employment area, potentially with a link road to the remainder of Welborne (Option1) or not (Option 2). Those assessments indicated a number of issues regarding development at this location, and stated that it is "*Questionable whether employment at J11 could achieve design which is sympathetic with the immediate landscape (Portsdown Hill)*" (DLP13, Appendix B). The Sustainability Appraisal process informed the decision to

exclude the land north of junction 11 from the Welborne Plan boundary. This conclusion echoed the comments in the Inspector's Report following the Core Strategy Examination, which highlighted the issues of landscape sensitivity and the potential for development at this location to harmfully affect the development of more sequentially preferable sites (paragraphs 21 and 22, DLP03).

- 4.9.9 A representation was submitted in relation to the Land north of junction 11 (site (i) in Question 4.9) in response to the publication version of the DSP Plan. The site had not previously been submitted, or considered, as part of the DSP process, due mainly to its relationship with the Welborne Plan. However, given that Table 3, page 44 of the submitted DSP Plan shows a potential oversupply of around 31,000sq.m of employment floorspace there does not appear to be an issue with meeting such targets elsewhere in the Borough, and so there appears to be no justification in allocating this greenfield site for employment uses. Allocating this site would appear contrary to SA conclusions for the Draft Welborne Plan (DLP14), the advice of the Core Strategy Inspector (DLP03) and the general principle of focussing development into existing urban areas set out in CS6 of the Core Strategy.
- 4.9.10 The Land at Pinks Hill (sites (ii) in Question 4.9) was considered as part of the Employment Land Review (DED02). The site is located to the north east of Fareham adjacent to, but not immediately accessible from, Junction 11 of the M27. The site slopes significantly from west to east with main access provided from the A32 and Standard Way. The site was summarised in paragraph 6.39 of the ELR (DED02) where it considers additional access via the narrow Pinks Hill as "undesirable", but notes alternative access exists via Standard Way. The site did score reasonably well (rated C) in terms of suitability for B2/B8 uses, but is *"not particularly prominent and...not sequentially preferable"*, which showed the site was less suitable for B1 uses (rated D). The overall conclusion was that the site should *"only be considered if floorspace targets for B2/B8 cannot be met elsewhere"*. Given that Table 3, page 44 of the submitted DSP Plan shows a potential oversupply of around 14,000sq.m of B2/B8 floorspace there does not appear to be an issue with meeting such targets elsewhere in the Borough, and so there appears to be no justification in allocating this site for employment uses.
- 4.9.11 The land between Southampton Road and Segensworth Road (site (iii) in Question 4.9) was considered as part of the Employment Land Review (DED02). The site is located in close proximity to the wider Segensworth employment area and Southampton Road, with links to Junction 9 of the M27. The site is owned by multiple landowners, which could adversely influence deliverability, whilst recent representations have shown that the preferable development option for the landowners is a mix of residential and employment. The Council is confident that the DSP Plan allocates sufficient employment and residential sites to meet its development requirements within existing employment areas. Therefore there appears to be little justification for the allocation of this site.

4.9.12 None of the three sites have been subjected to a full sustainability appraisal in their own right as none were considered to be suitable for allocation as part of the Development Sites & Policies Plan. Sites (ii) and (iii) were consulted on as part of the Issues & Options stage of the Site Allocations process, but were not progressed further due to being located outside of the urban area boundary. For any of these sites to be allocated they would need to go through a full sustainability appraisal and further rounds of public consultation to give residents an opportunity to comment fully.

4.10 *Bearing in mind the Development Site Briefs are intended only as a guide, do they provide sufficient information to provide a decision maker a clear indication of how to react to a development proposal?*

4.10.1 The Development Site Briefs are intended to act as a guide to providing applicants/agents on the level of information needed, including highlighting key information that will be expected to be provided to support future planning applications.

4.10.2 The “Key Planning and Design Issues” sections of the Development Site Briefs provide a general background to each site highlighting certain strengths and weaknesses that should be considered. This can help focus the mind of both applicant and decision maker on key elements of each site, and act as a checklist for considering any proposal that comes forward. The “Information Required” sections of the Briefs set out specific information the Council sees as necessary to fully judge any submitted proposal. This list has been produced in consultation with a range of Council Departments and Statutory Bodies who are likely to be involved in the decision making process.

4.10.3 The addition of indicative capacity information (see answer to Question 4.3) as a minor modification should provide both applicant and decision maker with a broad indication on the anticipated capacity of each of the five allocations. Whilst this capacity is not a specific target or ceiling figure, it can be used when considering any proposals that come forward. Applications for proposals well above or below these capacity figures will need to be supported by evidence justifying this position.

4.10.4 Overall the Council believes that the Development Site Briefs provide clarity and sufficient detail to act as a starting point in helping perspective developers creating proposals for each site. They also act as an informative and useful guide to help decision makers when such proposals come forward, as they go beyond simple allocations and boundaries on the Policies Map by providing bespoke information relating to the individual characteristics and issues on each site.

APPENDIX 1 Little Park Farm Landowners Response to Draft DSP Plan



**LOW DENSITY EMPLOYMENT LAND DEVELOPMENT
LITTLE PARK FARM ROAD, SEGENSWORTH, FAREHAM**

Introduction

Frobisher Developments Limited (FDL) propose a low density development generally in accordance with Fareham Borough Council's (FBC) Employment Land Review reference paragraphs 5.8 and 5.9 dated October 2010 and the Core Strategy, paragraph 5.20. A site location plan is attached at appendix i and the site perimeter is outlined in red on the aerial photograph attached at appendix ii.

The overall site area comprises approximately 16.4 acres of land, the first parcel of which was acquired by FDL during 2001.

Land Assembly

Land assembly is currently in hand, albeit that it has, until now, been a slow process. The current position is noted below by reference to dwg. No. 3791.04 attached at Appendix iii:

1. Parcel nos. 2, 8 and 9 acquired 2001.
2. Parcel nos. 1 and 7 comprising roadways and amenity land acquired 2003.
3. Acquisition contract terms are agreed in respect of Parcels 11 and 13 and exchange of contract scheduled for end 2011.
4. Terms have been agreed for the purchase of Parcels 4, 5 and 6 with an anticipated contract exchange before end of 2011.
5. Parcel 14 is located within Winchester City Council's (WCC) jurisdiction. Acquisition negotiations are in hand with acquisition anticipated by mid-2012.
6. Parcel 3 acquisition outstanding.

In addition to the principal sections of title shown on dwg. No. 3791.04, Parcels 10, 15 and 16 are in the ownership of Environment Agency (EA), Network Rail (NwR) and Hampshire County Council (HCC) respectively. The latter two parcels are encompassed within FDL's Access Improvements negotiations detailed below.

Access Improvements

As has been identified in previous FBC commentary, site access is restricted and requires improvement. Aside from delays in land assembly this has been the major obstacle to bringing the site forward for development within its present Employment Land allocation.

Access from the Dewar Close/Little Park Farm Road roundabout, on Segensworth West Industrial Estate to the site entrance, is via a section of Little Park Farm Road owned privately by HCC Estate Department and thence through a restricted height Victorian railway arch bridge (referred to as Hayling Farm Bridge E15/37) owned by NwR.

Discussions are ongoing with HCC Estates and Highways Department surveyors regarding the physical reconstruction of Little Park Farm Road. Provision for access over Little Park Farm Road and the necessary improvement to such, is already provided for in easements benefiting FDL.

Hampshire County Council

Current road improvements are proposed as per dwg. No. F13878-P600-P2 - One-way Single Carriageway option, attached as appendix iv. The road improvements have been designed so as not to impinge upon long leasehold interests previously sold away by HCC adjacent to Little Park Farm Road and to work within FDL's easement parameters referred to above.

Road improvements will provide for Two-way traffic on the upper parts of Little Park Farm Road, controlled by traffic lights through both the bottom section of road and the railway bridge. The road will not be subject to adoption.

Network Rail

Discussions are ongoing with NwR Engineers and Property Board surveyors. Design and cost planning have been undertaken to NwR GRIP Stage 3. Detailed bridge design and construction contracts are pending finalisation of consideration with NwR Property Board in respect of Easement variations from NwR under the precedent Stokes vs Cambridge 1961 and Somerset County Council vs Snook 2004.

An Optioneering exercise has been carried out by NwR and Osborne, examining feasibility of reconstruction of the bridge to provide for a new two-way single carriageway road to replace the existing narrow and reduced height bridge, through to the traffic light controlled access option identified in F13875.SK.04A - Arch details, at appendix v. It has been established with NwR that broader reconstruction of Hayling Farm Bridge, to provide a two-way single carriageway road, is both uneconomic and overly disruptive to the railway line, whilst levels re-alignment of Little Park Farm Road would have a knock-on effect that would disrupt and compromise the adjacent commercial occupiers.

Reconstruction in accordance with F13875.SK.04A – Arch details, will maintain a single lane width at 3.65m whilst introduction of a new concrete box section, mounted off the existing abutments, will increase height clearance to some 5.050m, improved from an existing effective clearance of the existing arch of +/- 3.5m.

NwR have confirmed that works can be undertaken in a single 52-hour Line closure, but subject to up to 80 weeks notice of closure of the Lines to rail operating users on this route.

Planning Applications

A planning application, on behalf of FDL, for the reconstruction of Little Park Farm Road is in the course of preparation by Southern Planning Practice and Gyoury Self, with a pre-application meeting with FBC requested. It is understood from NwR that works of reconstruction to Hayling Farm Bridge fall within the scope of Permitted Development and the appropriate Notices will be submitted to FBC in due course.

Land Use

In FBC's current Employment Land allocation it is stated that land within this enclave is best suited to low density development, not exceeding 35%. Current industrial/warehouse development "best practice" indicates a maximum development density of 35-40% on a modern industrial estate, with uncompromised access.

In this instance, whilst having significantly improved access the site will still be, to a degree, compromised by the bridge height restriction and width. It is anticipated that the development platforms to be created will appeal to open storage, low density depot-type and sui generis users at construction densities of less than 20%.

The site is currently under consultation for inclusion in the Hampshire Minerals & Waste Plan, for use in categories 1, 2, 3 and 5. FDL have been working with HCC; both consider the site eminently suited to sui generis uses within the constraints/criteria of the Minerals & Waste Plan. A copy of the current HCC Minerals & Waste Plan consultation extract in respect of this land is attached as appendix vi.

It is only in recent months that significant progress has been made with NwR. In the past occupational interest in the land both from low density B1c, B2, B8 users and sui generis users has fallen away through the inability of FDL to offer certainty of site access improvement. These enquiries have included Coach/Bus and Commercial Vehicle Depots, Cargo Handling facilities together with sui generis users such as MRF, bottom ash and other materials recycling etc.

Time Scale

Assuming conclusion of land assembly as above and subject to both the grant of Planning Consent for improvement works to Little Park Farm Road and approval of Permitted Development Notices submitted by NwR it is envisaged that access improvement works could start in late 2012/early 2013, facilitating commencement of redevelopment to the site itself during 2013/14.

Conclusion

FDL consider the site development to be "deliverable" within the parameters and time scales set out above. Based on the site assembly values in hand, coupled with current budgets for access improvements, FDL consider bringing this site forward for development to be economically viable and have the funds immediately available to commit to this venture upon confirmation this Employment Land will continue to be so allocated under FBC's core strategy.