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Hearing Statement

Fareham Local Plan Examination

Matter 2 – Hearing Day 1

Development Strategy, Landscape and Strategic Gaps

Prepared on behalf of Cambria Land Ltd

February 2022

Hearing Statement, Matter 2

1 Introduction

- 1.1 This Statement has been prepared on behalf of Cambria Land Limited in respect of the Fareham Local Plan 2037, which has been submitted to the Secretary of State for Examination.
- 1.2 This document seeks to make a series of representations on the Local Plan and the evidence base that underpins it; specifically, in response to the Inspectors Matters, Issues and Questions.
- 1.3 Cambria Land are promoting an area of land for employment use at Junction 11 of the M27 as they consider that there is a need for more land to be allocated within Fareham (and indeed the wider South East region) for employment needs to provide sites of the right quality in the right location to meet the needs of businesses over the plan period.
- 1.4 Responses are provided to the relevant questions that will form the basis of the Hearing Session regarding Matter 2 covering the Development Strategy and the proposed Area of Special Landscape Quality.

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2 Matter 2 Development Strategy(Strategic Policies DS1-3)Questions

1. Does the development strategy in the Fareham Local Plan reflect the vision and strategic priorities set out in the plan?

2.1 Part of the Council's vision for the new Local Plan is to accommodate the need for new employment space in the Borough, identifying the '*most appropriate locations that are attractive to the market and acceptable in terms of environmental impact.*' The Vision continues to state that Fareham will '*...have a strong and diverse economy with improved levels of self-containment with people working from home or close to home.*'

2.2 The Development Strategy does not reflect this vision for the following reasons:

Identifying the most appropriate locations that are attractive to the market

2.3 The Addendum to Business Needs, Site Assessments and Employment Land Study (document EMP002) identifies that the Down Barn Farm site scores highly in respect of its strategic location and also occupier perception. However, despite scoring higher on these two scores than most of the other employment sites, no additional land has been allocated at Down Barn Farm/Spurlings Industrial Estate to meet occupier needs.

2.4 The assessment criteria is artificially skewed by the 'Planning Status' element that seems to be based on whether the site is allocated or not, rather than its attractiveness to the market and suitability for employment development. The scoring for this is arbitrary and could easily be rectified by allocating the land for employment purposes which would increase the scoring to a level comparable with other sites being brought forward under this plan.

2.5 The National Planning Policy Framework (the Framework/NPPF) is clear in promoting development at sites that cater to specific occupier requirements, including where location is important to particular sectors such as logistics, storage and distribution uses (NPPF para 83). The superior locational characteristics of the land at Down Barn Farm is not in question, yet it has been discounted and other less suitable sites in poor locations with question marks over their delivery have instead been put forward as allocations.

2.6 Existing allocation at Daedalus will not be suitable for particular types of development as they do not have sufficient access to the motorway networks and may have more specific locational requirements than can be offered by this site (e.g. operators for a high number of HGV movements or those which have processes not compatible with the surrounding uses).

2.7 There are concerns that some of the remaining allocations identified in the Draft Local Plan will not come forward as they are constrained and there is no realistic prospect of them coming forward for employment use.

Solent 2 (Policy E4)

- This site has had planning permission for B1 development since 2016 and a screening request was then submitted for an alternative form of development but no further application has yet come forward to develop the site.

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- An EIA screening request was submitted for an alternative form of development but no application has since come forward since this time.

Little Park Farm (Policy E4c)

- Access is constrained as it is via a single-track road that needs to pass under a narrow railway bridge. So whilst the site may be suitable for smaller occupiers, or those with limited traffic movements, the site is therefore not suitable for general needs employment.

- 2.8 These sites have benefitted from an allocation in the previous Development Plan and did not come forward under that plan period, despite a period of high demand for employment land in the area.
- 2.9 In contrast, the additional allocations set out in the Draft Local Plan (Land North of St Margaret's E4a and Land North of Military Road E4b) have already been the subject of planning applications ahead of their allocation in the Development Plan, which demonstrates that there is a continued need for viable and available employment land in the right locations.
- 2.10 The Vision is clear in saying that locations will be identified in the new Local Plan that are appropriate and attractive to the market, but the Development Strategy does not back this up.

A strong and diverse economy with improved levels of self-containment

- 2.11 We are aware of existing employment sites that will be displaced as a result of the Welborne development coming forward and this situation will also potentially increase with the Council's focus on the intensification of existing sites, which will require vacant possession of the land to realise any significant increase to floorspace and employment capacity.
- 2.12 There is at least one local employer with existing premises that will be affected by the Welborne Development that has been searching for a new location to consolidate activities to but has been unable to find new accommodation. For example, TJ Waste who require premises for transport and waste related operations, but are unable to find anything suitable in the area, have approached Cambria Land as the land at adjacent to the Spurlings Industrial Estate and Down Barn Farm would meet their needs (please see their recent correspondence attached at Annex A). If land such as that at Down Barn Farm is not allocated, then this occupier will need to find premises outside of the Borough, and others will likely follow. This will not meet the Council's vision to provide a strong and diverse economy as they will lose existing businesses and this will weaken levels of self-containment.
2. *Is the development strategy for the location and nature of development in Fareham, justified as the most appropriate strategy for the sustainable development of the borough, when considered against the reasonable alternatives?*
- 2.13 No, sufficient flexibility has not been provided for any additional/alternative allocations to meet employment needs over the plan period, particularly during the early part of the plan. The Council acknowledge that a large part of the employment land will only come forward in later

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periods, with a significant amount dependent upon the delivery of infrastructure to support the Welborne development.

- 2.14 As noted above, there are also concerns over the suitability and attractiveness and also size, of other employment allocations in the Plan and it is considered that there is insufficient scope to adapt to meet employment needs or adapt to change over the next plan period.

Settlement Boundaries

5. *Will the settlement boundaries, combined with other policies and allocations, enable the Plan to meet the need for housing and employment whilst providing sufficient flexibility to adapt to change?*

2.15 No, sufficient flexibility has not been provided for any additional/alternative allocations to meet employment needs over the plan period, particularly during the early part of the plan. The Council acknowledge that a large part of the employment land will only come forward in later periods, with a significant amount dependent upon the delivery of infrastructure to support the Welborne development. As noted above, there are also concerns over the suitability and attractiveness and also size, of other employment allocations in the Plan and it is considered that there is insufficient scope to adapt to meet employment needs or adapt to change over the next plan period.

2.16 It is also noted that whilst the Spurlings Industrial Estate is identified as an existing employment area, the existing developed site at Down Barn Farm, which includes an employment/waste use and a small office building is not identified as an employment area. This will reduce Fareham's ability to react to change and make most efficient use of the previously developed land that it has at its disposal.

2.17 The Spurlings Industrial Estate and existing Down Barn Farm site can be put to better use to support employment needs and the settlement boundary should be amended to include these as existing employment areas with the land adjacent allocated for employment use to provide a more flexible supply of employment land that is in the right location and will be attractive to the market, as evidenced by the strong interest from TJ Waste.

Strategic Policy DS1 – Development in the Countryside

6. *Is the approach to development in the countryside justified, effective and consistent with national policy supporting a prosperous rural economy?*

2.18 Paragraph 85 of the Framework states:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements,

2.19 The Framework therefore acknowledges that sometimes development needs to happen in more rural areas, but the planning system should be flexible and responsive to cater for needs that may occur such as this. Sufficient flexibility therefore needs to be built in to the policy to ensure that it is consistent with national policy.

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7. *Is the requirement for development to be on previously developed land in criteria b) too restrictive?*

2.20 Yes, this is considered too restrictive as there may be circumstances that require land that is not previously developed to be brought forward to meet particular circumstances and needs not provided for in the new Local Plan. As noted by paragraph 85 of the Framework, as set out above, policies should provide flexibility to allow for development to occur in countryside locations to meet a defined need, which may be outside of settlement boundaries and therefore unlikely to be on previously developed land.

2.21 The wording of policy DS1 should therefore be amended to provide greater flexibility to allow development to come forward where there is an identified need that cannot be met elsewhere. It is acknowledged that this should preferably come forward on land that is previously developed and well located in respect of other existing development, however this may not always be the case.

8. *Criteria i) – m) apply to all proposals but criteria a)-h) are mutually exclusive. Is the policy effective in this regard?*

2.22 No Comment

9. *Criteria e) and f) link to the housing and employment development policies. Is there potential for conflict between these policies and unintended development in the countryside?*

2.23 No Comment.

10. *Is it clear to decision-makers, developers and local communities how proposals should demonstrate the requirement for a location outside of an urban area?*

2.24 No, but it is assumed that this will need to be considered on a case-by-case basis to assess the planning merits of such a proposal. Greater detail could perhaps be provided to define key criteria that would generally support a proposal, such as details of why no alternative locations are available or suitable, or why a development needs to take place in a particular location, for example to ensure continuity of operations, adjacency to the strategic highway network or to be in proximity to an existing workforce.

11. *Is the requirement that proposals should not be on best and most versatile agricultural land in criteria m) consistent with the Framework?*

2.25 No comment

Strategic Policy DS3 – Landscape

13. *Is the identification of Areas of Special Landscape Quality (ASLQ) justified, effective and consistent with national policy, in particular paragraph 174 of the Framework?*

- 2.26 The land adjacent to the Spurlings Industrial Estate and Down Barn Farm, which is included in the proposed Area of Special Landscape Quality is more readily defined by the urban influences in its vicinity and this part of the landscape designation is not particularly sensitive or considered to be of any meaningful landscape value. The Technical Review of Areas of Special Landscape Quality (document DS003) notes that there are intrusive influences to the southern part of this proposed area, that experiences less tranquillity than the higher slopes owing to the proximity to the M27 motorway (Chapter 3 paragraph 8).
- 2.27 Furthermore, the land is at a considerably lower level and it is considered that including the area around these existing employment sites is not protecting a valued or particularly sensitive landscape at that location, so this is not in accordance with paragraph 174 of the Framework.

14. *Has the Technical Review of ASLQ followed a robust process? Are the boundaries identified appropriate and justified?*

- 2.28 Whilst we would agree that the area of Portsdown Hill around Fort Nelson is of relatively high sensitivity and landscape value, due to its elevated position and *open expansive character with few hedgerows or trees*, the area around the existing Spurlings Industrial Estate and Down Barn Farm site is of less sensitivity and at a much lower level, with a variety of urbanising features that detract from the open nature and landscape sensitivity. In particular, the lower parts of the proposed area of Landscape Character are more readily defined by the following features:
- The prominence of a number of unsightly elements in the form of existing buildings and yard areas, masts, fences and typical roadside clutter;
 - The intrusion of the M27 motorway which cuts through the chalk scarp and divides its upper and lower slopes; and
 - The physical isolation of the lower slopes by roads, railways and urban development, and the impact of quarrying, all of which intrude upon its open, rural character.
- 2.29 It is therefore considered that including the area around these existing employment sites is not protecting a valued or particularly sensitive landscape at that location, so the approach to determining which areas should be subject to this designation have not been robustly assessed.

15. *Is it clear to decision makers, developers, and the local community what schemes are defined as major development proposals? Is the policy and supporting text effective in explaining the landscape assessment requirements for non-major developments?*

- 2.30 We have assumed that a major development proposal would be the same as that defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015

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16. *As the criteria in the policy are based on the Guidelines for Landscape and Visual Impact Assessment, should the supporting text in para 3.57 clarify that a Landscape and Visual Impact Assessment would be required, not simply a Landscape Assessment?*

2.31 We would agree that a Landscape and Visual Impact Assessment (LVIA) would be an appropriate document to support any development proposals. Information to illustrate that development of the land adjacent to the Spurlings Industrial Estate and Down Barn Farm sites has been submitted previously to demonstrate that visual impacts would be limited and mitigated through the preparation of an appropriate Green Infrastructure Strategy.

17. *What is the justification for landscaping schemes to be 'in accordance' with the Council's Landscape Sensitivity Assessment? Is this a development plan document?*

2.32 Landscape schemes should be guided by the LVIA that supports the development proposals, which will consider the landscape sensitivity, key receptors and the impact of any development on the landscape setting.

2.33 The proposed landscape scheme should seek to mitigate any impacts where possible, help the development integrate into the surrounding area and enhance the surrounding landscape wherever feasible. This is an entirely proper approach and the LVIA and proposed landscape scheme will then be the subject of consultation and discussion with the Planning Authority and other stakeholders to assess the detail of any proposals in an appropriate and tested manner. As it is understood the Council's Landscape Sensitivity Assessment has not been subject to formal consultation then it should not be something to be complied with, as any proposals and landscape impact will be assessed through the established planning process to determine applications.

2.34 We would also support reference to the enhancement of biodiversity to be considered in conjunction with any landscape scheme, which would be consistent with the requirements of the Framework and the Environment Act.

Annex A



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Councillor Sean Woodward
Leader, Fareham Borough Council
Civic Offices
Civic Way
Fareham
Hampshire, PO16 7AZ

15 February 2022

Dear Councillor Woodward

TJ Group Limited and Spurlings Industrial Estate

I am writing in connection with TJ Groups property requirement and the upcoming Local Plan Examination in Public.

TJ Group are under pressure to vacate from their exiting sites in Fareham and Portsmouth. Land adjacent to Spurlings Industrial Estate on Junction 11 of the M27 provides an excellent opportunity for TJ to consolidate and relocate from their existing outdated facilities and invest in a new world class and highly sustainable waste and operational facility. TJ have been working with Cambria Land who control land at Spurlings to design a new facility. It is critical to our organisation that the land needed for this new facility gets allocated in the new Fareham Local Plan to enable this business transformation.

Vacant Possession

TJ Waste & Recycling Ltd is the waste management arm of TJ, serving both commercial and domestic consumers with a range of waste collection and disposal solutions in the South East Region, including Fareham. Under this banner, TJ operates a network of strategically located Materials Recovery Facility's equipped to recycle up to 100% of waste received. Through organic growth and acquisition, TJ Waste & Recycling has become one of the leading independent waste management providers in the South East.

TJ Transport Ltd is the bulk haulage arm of TJ, serving the construction, building materials and waste industries with external transport solutions for their products and waste. Over 20 years of working closely with these industries TJ Transport is the leading bulk haulage provider in the Southern Region. Under this banner, TJ operates a network of inert recycling facilities producing secondary aggregate. To compliment it's own product range, TJ Transport sources and delivers a wide range of aggregates through a network of quarries and wharves around the UK, providing a one stop shop for commercial and domestic consumers.

Founded in 1994, TJ have three main operating facilities: Tipnor, Portsmouth; Belvedere Road, Southampton; and their head office on Charity Farm, Fareham. Tipnor and Fareham are part of long term regeneration and redevelopment plans. Tipnor is being promoted by Portsmouth City Council for major regeneration, and Charity Farm is on the site of the new Welbourne Garden Village. It is critical the business is able to find suitable alternative accommodation close to the majority of their existing workforce in the borough of Fareham.



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Sustainability and Efficiency of Operations

Creating a new facility at Spurlings would significantly improve the environmental performance of the business. Extensive research has been carried out and a world class modern energy-from-waste plant is proposed. Further research and development will take place at the new facility which will advance the technology in this space. In addition, consolidating on one site would also create operational efficiencies, especially with the excellent access to the motorway network that Spurlings provides.

Retention of Staff in Fareham

TJ employ 210 staff. A substantial proportion, over 40%, live in Fareham. The majority of staff are employed at Charity Farm on Wickham Road in Fareham. A relocation to Spurlings would mean the company can retain its staff and provide a long term financially sustainable home for the business, necessary for the significant investment needed to create a new facility.

TJ have searched and there are no other suitable sites in Fareham. If Spurlings is not allocated in the Local Plan the business will have to relocate out of the borough to find suitable alternative accommodation.

Consistency with Local Plan Policy

The draft Local Plan refers to expanding existing employment sites, and specifically refers to Spurlings Industrial Estate. It does not however refer to the adjacent Down Barn Farm (also controlled by Cambria) which has an existing waste licence. The current wording in the draft Local Plan is ambiguous and probably insufficient to give us the confidence to prepare and submit a planning application. The site should be specifically allocated in the Local Plan. Cambria Land have made extensive representations at each stage of the Local Plan consultation process.

The design is based on the best available proven technology and would significantly add to Fareham's environmental ambitions. We would welcome the opportunity to come in and present our proposal to secure your support. To drive this ambitious project forward we will contact your offices to arrange a conversation as soon as possible.

Yours sincerely
John Gosling



Managing Director
T J Waste & Recycling Ltd