

Hearing Statement

Fareham Local Plan Examination

Matter 8 – Hearing Day

Employment

Prepared on behalf of Cambria Land Ltd

March 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 adjacent to Junction 11 of the M27, the Spurlings Industrial Estate and Down Barn Farm employment area, 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 8 covering Employment.

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2 Matter 8 Employment

(Policies E1-E7) Employment land need and supply.

Questions

1. *What is the justification for the scale of employment land allocated in the Plan?*

- 2.1 There is considerable demand for employment land in Fareham and there has been an undersupply of high-quality sites to meet occupier's needs over the past few years, so there is a need to ensure that sufficient land of the right quality and in the right location is provided to meet these needs across the next plan period.
- 2.2 The allocations from the current Local Plan demonstrate that just because land is identified for development in the Local Plan, it is not necessarily taken up as some of the sites that were previously allocated remain undeveloped. Some of these existing allocation have significant constraints that either affect their development, or make them unattractive to occupiers, so it is considered that additional well-located land needs to be made available for development.
- 2.3 Whilst it is presented as an over-supply in numerical terms, a range of sites are needed to provide for different types of employment requirements across the plan period and to ensure that enough land is allocated, especially where some proposed employment sites may still not come forward.
- 2.4 Additional land needs to be provided to meet occupier requirements that can't be met by existing sites or those that are proposed to be allocated in the emerging Local Plan.
- 2.5 There are material issues that will affect the delivery of allocated sites within the early part of the plan period.
- 2.6 In order to make the Plan Sound and for it to be in accordance with the Framework, additional land of the right quality and in the right location and that can come forward in the early part of the plan period needs to be allocated to provide sites that are attractive to the market and which meet the needs of businesses.

2. *What are the implications of the surplus of employment land? If taken up will there be sufficient housing to support their development? Will there be an appropriate balance between workers and homes? Will the surplus depress land values to a point where development is not viable?*

- 2.7 As noted above, some sites that are propose to benefit from an allocation in the Local Plan may not come forward as they cannot provide the right conditions for businesses looking for new premises or they are otherwise constrained such that they cannot come forward either within the Plan Period or when demand dictates, or provide suitable alternative accommodation for relocating businesses within the Borough that will need space due to the requirements for vacant possession such as those at Welbourne. It is considered that additional land needs to be allocated that is attractive to the occupational market, in the right location with excellent connectivity to the motorway network and available in the short term.
- 2.8 It is specifically acknowledged in the Local Plan that some of the existing site allocations will only come forward towards the end of the Plan period. As noted in the NPPF (paragraphs 82 and 83), a flexible and responsive supply of employment land should be provided to adapt to change and meet the needs of business with the locational requirements of specific sectors allowed for.
- 2.9 The allocation of additional land is unlikely to depress land values as occupiers will go to the sites that meet their requirements, with high quality sites charging a premium because of their locational characteristics and lower quality sites with poor access will attract lower values. If sites do not meet occupier's

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requirements, then they will look elsewhere for sites with the right credentials, which means that Fareham will lose investment as it will not be an attractive location for businesses to locate to.

- 2.10 One of the stated aims of the Council's Development Strategy is to make the Fareham Economy more self-contained, so making sure that there is enough land for businesses will help to achieve this aim.

3. Paragraph 6.8 of the plan states that Policy E1 identifies a requirement for office and industrial uses. This is not the case. What is the justification behind this?

- 2.11 There is a clear requirement for industrial and warehouse and logistic uses, as well as other more specialist uses such as manufacturing, and there are continuing high levels of demand for new floorspace to accommodate these uses across Fareham and the wider South Coast area.

4. Policy E1 identifies sites for employment use but does not indicate what type of employment uses would be appropriate on each site. Is this approach justified? How does this ensure that the specific employment needs of the borough are met? Are the range of sites allocated in the plan appropriate for any type of employment use? How does this relate to existing planning permissions for specific employment uses?

- 2.12 This is considered to be a failing of the evidence base and the draft Plan, which deals with quantity of land supply rather than quality. The Vision for the draft Plan is to provide sites that are attractive to the market. For general employment land to meet B2 and B8 requirements, this means that land needs to be allocated that has good access, close to the motorway and can deliver units of the size and type that the market requires.

- 2.13 Large parts of the proposed employment land supply are either too far from the motorway network to be attractive for general employment needs and accessed via residential areas, or are otherwise constrained either by the type of employment premises that can be accommodated due to neighbouring uses, or in the timing of their delivery, only coming forward after massive infrastructure investment.

- 2.14 The sites that make up the allocations E2 and E3 (Faraday Business Park and Swordfish Business Park – collectively referred to here as Daedalus) are too far from the motorway junctions, even with the delivery of the Stubbington Relief Road, to serve the parts of the market where accessibility is key. Furthermore, the site is focused on hi-tech and aviation uses.

- 2.15 Of the remaining sites that are close to the motorway network, these are either small sites that will not make a meaningful contribution to the employment land supply (such as sites E4b and E4d), are small sites and in occupation for other uses that won't come forward early in the plan period (site E4a), or are constrained in other ways that will affect delivery, such as narrow bridges on access roads (site E4c) or poor market sentiment (E4).

- 2.16 There is a heavy reliance on Welbourne coming forward to provide large employment units in a high quality location that the market demands. However, the timescales are reliant on significant infrastructure works and funding to secure an improved motorway junction, as well as relocation of existing businesses. It is understood that the landowner and developer of Welbourne, who controls the existing units at Dean Farm that forms part of Welbourne development, is to grant new ten year lease extensions to the existing tenants, clearly indicating that no commercial development will come forward for some time.

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- 2.17 By the time the leases end in 2032, reserved matters approvals are granted, and demolition, remediation and construction is complete the earliest that new commercial space of this quality will come forward is probably 2034 or 2035, right at the end of the plan period. Therefore clearly only a fraction of the proposed 90,000 sq m (gross) of new employment floorspace at Welbourne is likely to be developed in the plan period.
- 2.18 Furthermore, development at Welbourne will ultimately lead to the displacement of 13,860 sq m of existing operational employment space at Dean Farm and the wider Welbourne site that already benefits from good proximity to the Motorway network. These occupiers will need to go to an alternative employment site in Fareham or these businesses will have to leave the Borough, which will not support part of the Council's vision to improve self-containment and retain employment.
- 2.19 The sites E4b, E4c and E4d could provide in the region of 10,000 sq m of floorspace, but this does not take account of uses, sizes or unit configurations that these existing occupiers at Dean Farm may require or whether they want to expand or consolidate operations to improve productivity or efficiency. One such occupier, TJ waste, a significant and long standing local business has been looking for a new location as they will be displaced by the Welbourne development, but they are unable to find a site to move to within Fareham that meets their needs. This is a failing of the Local Plan as it has not considered the need for a buffer of employment land of a similar quality to help manage issues such as this. TJ Waste have engaged with Cambria Land to explore a relocation to the site adjacent to Down Barn Farm and the Spurlings Industrial Estate, where all of their current and future needs can be met, due to a lack of alternative locations (a copy of their recent correspondence regarding their search for alternative locations is included at Appendix 1 of this statement).
- 2.20 Of the remaining sites at Little Park Farm (E4c) and Solent 2 (E4), these are already allocated in the adopted Plan but have not yet come forward as they have material constraints to deal with including access and ecology that will affect their delivery or attractiveness to the market.
- 2.21 The Evidence Base to the Local Plan (documents EMP001 and EMP002) identify that the site at Little Park Farm, even with an improved and signalised access underneath the railway bridge, is only likely to be suited to occupiers with low intensity operations or B8 open storage use due to the access constraints. The site also accommodates existing uses, that would need to move elsewhere, and a residential property would be retained at the site that could compromise intensive use of the site or operations during out of normal business or night time hours.
- 2.22 The Solent 2 site previously secured planning permission for B1 office use in 2008, the approved layout comprises a number of smaller office blocks within a wooded area. The site accommodates an area of ancient woodland, trees that benefit from TPO's and also areas of priority habitat in the form of deciduous woodland and lowland meadow. The ecology report that supported the previous development also noted that a population of slowworms are present on the site and these would need to be translocated to an alternative location as the proposed form of the development could not support this population by retaining sufficient habitat for them.
- 2.23 The land at Little Park Farm is therefore only suitable for a limited range of uses that would not require high levels of traffic movements, whilst the site at Solent 2 has only demonstrate that it is suitable for smaller office units that can be accommodated amongst the retained areas of ancient woodland and habitat that should be protected. Use of the Solent 2 site for B2 or B8 development would require larger, more regular footprints and service yard areas that would be significantly harder to accommodate on the site, and development would also need to address the nearby housing, that could restrict 24/7 operations and

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significant amounts of mitigation and compensation to deal with loss of habitat (much of which is priority habitat) to also secure a net gain in biodiversity that could not be accommodated on site.

- 2.24 The two proposed allocations E4 and E4c, would therefore have more limited development capacity and market appeal, and the Solent 2 site appears to have significant issues affecting its delivery that have not been fully considered in the site assessment process, which is a failing of the draft Plan and the supporting Evidence Base.

5. The Stantec Report (EE004) identifies a demand for strategic warehouses and recommends the provision of 5 new sites in the sub region, an additional need of around 50ha. Does the plan seek to address this? If not, why?

- 2.25 With the exception of the Welbourne site, which will not come forward until the very end of the plan period, the Local Plan does not address this need. The land adjacent to Down Barn Farm/Spurlings Industrial Estate, could potentially provide land of 10 Ha + that would help to meet this need as it has the right credentials to appeal to the occupational market in terms of immediate access to the motorway network, single ownership, few development constraints and a straightforward site in respect of ecology and land form. A Green Infrastructure led strategy, respecting the local landscape could provide the employment space that would help meet these strategic needs immediately, certainly at a much earlier stage in the plan than Welborne.

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Employment Policies

Policy E5 – Existing Employment Areas

6. Part b) of the policy requires a development to facilitate the creation of additional jobs. However, extensions may not create new jobs but support existing ones or result in modernisation. What is the justification for this policy requirement?

- 2.26 The extension of premises within existing employment areas are not necessarily considered to lead to the creation of many new jobs and relying on job creation under this policy is not a robust approach as the question alludes and is only likely to lead to marginal gains in floorspace and job opportunities. However, the extension of employment sites outside their existing boundaries to accommodate the needs of businesses looking to expand or to accommodate new development that cannot fit within the existing boundary of an existing employment area, however, would, should be allowed where development would not lead to any unacceptable impacts, as this approach would provide a more flexible approach to meeting the needs of businesses and be consistent with the terms of the Framework.
- 2.27 The Down Barn Farm site should also be identified as an existing employment site as it accommodates existing employment uses. The full Down Barn Farm site has not been identified as an existing employment area, as its existing use is acknowledged within the Council's own evidence base in document EMP001 (Site assessment for site ref 179, inc 3141). For some reason it is not reflected on the proposals map.
- 2.28 The proposals map therefore needs to be amended to include the existing employment uses at Down Barn Farm including the unit that is in use for the processing of hard-core and concrete material, which generates employment activity and is taking place on previously developed land. This will allow the best use of previously developed land to be made over the plan period to meet Fareham's ongoing need for employment land.

*Employment Allocations Site selection**10. Has the site selection methodology followed a robust process?*

- 2.29 No, it is considered that the methodology does not result in the allocation of sites of the appropriate quality to meet the identified need. The selection process includes a 'Planning Status' section, which is arbitrary and relates to the chances of success of a development proposal at the site, which should not be a consideration at this stage of the Evidence Base.
- 2.30 The purpose of the Business Sites Assessment (document EMP001) should be to consider constraints of development and also opportunities presented by sites to be presented to the Local Authority who can then determine the issues affecting delivery as they would be better placed to do so. Including a planning status can artificially skew the scoring and should be removed. In any event, in the case of the land at Down Barn Farm it does not take account of the fact that permission has previously been granted for development at this site, or indeed at the existing adjacent Spurlings Industrial Estate, to provide for employment related development in this area.
- 2.31 The Framework 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 significant constraints and question marks over their delivery have instead been put forward as allocations.

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- 2.32 The Business Sites assessment also places significant emphasis on the proximity of some sites to local amenities but not others. This is inconsistent and misleading. One of the criticisms of the Down Barn Farm site was the proposed Area of Landscape Quality covering the site and its distance from local amenities.
- 2.33 In respect of landscape, the landscape around the Spurlings Industrial Estate and Down Barn Farm is not considered to be of such high sensitivity that development cannot take place, as it is characterised by lower lying topography, existing development and the presence of the M27, which all affect the landscape setting of this area, meaning that it has the potential to accommodate development without leading to any significant adverse impacts that can't be mitigated.
- 2.34 Furthermore the site has lower levels of tranquillity and is affected by relatively high levels of light pollution (Document DS003 Figures A3.3 and A3.4 of Appendix 3).
- 2.35 Whilst the site does not incorporate any amenities, although it is adjacent to a Park and Ride site offering access to Fareham town centre, the site is comparable to if not better than many other employment areas. The site benefits from links other areas of Fareham where facilities are located, and that can be accessed in a sustainable manner, e.g. by using the nearby pedestrian/cycle link underneath the M27.
- 2.36 The site would be circa 900 metres from the amenities found at Wallington (which includes 2 pubs, a Sainsbury's food store, costa coffee and other services), accessed using local streets, that generally have a 20mph speed limit and pedestrian/cyclist routes. This distance is comparable to the distance to amenities from the proposed allocation at Solent 2 (circa 600m to the nearby KFC, LIDL food store and Solent Hotel and Spa), but the scoring for amenities for Solent 2 is far higher at 4 when compared to the lower score of 2 from the Down Barn Farm site, when there is not a great deal between them in terms of length of journey or the type of amenities available.
- 2.37 The Down Barn Farm site is actually better located in respect of amenities than some existing employment sites, such as those at Concorde Way that are further from local amenities and have fewer connections that would be appropriate for walking and cycling, as they are on busier roads with a lack of infrastructure that would encourage walking and cycling.

11. The Business Needs Sites Assessment rates sites A-E according to their suitability. How has this informed the site selection? Why have some sites rated as A been rejected? Site Allocations Policies E2, E3, E4, E4a, E4b, E4c, E4d

- 2.38 The land adjacent to Spurlings Industrial Estate and Down Barn Farm is rated D, when this could easily be identified as a C or higher. Insufficient attention has been paid to the qualities of the site. The methodology supposedly identifies sites that will be of the most interest to occupiers with good access to the strategic highway network have a low rating for allocation purposes.
- 2.39 The site assessment study concludes that due to the landscape sensitivity and lack of access to amenities, the site has a rating of D. As noted above the site is not significantly worse in terms of access to amenities than some allocated sites. In respect of landscape matters, it was clear from the Hearing Session into Matter 2, that simply because a site is within an area of proposed Special Landscape Quality, it does not automatically mean that development cannot take place, it is instead a mechanism to ensure that full consideration is given to the potential impact of development on the wider areas that were determined to be of most sensitivity.

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- 2.40 The landscape around the Spurlings Industrial Estate and Down Barn Farm is not considered to be of such high sensitivity that development cannot take place, as it is characterised by lower lying topography, existing development and the presence of the M27, which all affect the landscape setting of this area, meaning that it has the potential to accommodate development without leading to any significant adverse impacts that can't be mitigated. .
- 2.41 Whilst the upper reaches of Portsdown Hill are visible from a wider vantage point, the lower reaches of the slope are far less sensitive and have a much more urbanised character that is associated with the development along the M27 motorway. Furthermore, there are existing hedgerows and trees around the site boundaries that can be reinforced to screen any development. .
- 2.42 Historically, planning permission has previously been granted for development at Down Barn Farm and the development at Spurlings Industrial Estate. Evidence has previously been provided demonstrating that the visual impact of new development could be mitigated through the preparation of an appropriate Green Infrastructure Strategy that would also give rise to benefits in respect of enhancements to biodiversity and enhancing public access to areas of the countryside.
- 2.43 As noted below, it is clear that there are other constraints affecting sites that are proposed for allocation that have not been given due consideration to ensure that a range of suitable sites are coming forward to meet different needs. The Solent 2 site has a number of constraints and there is a low level of confidence that this will be brought forward to achieve the quantum of development anticipated by policy E4. The site assessment study does not pick up on any issues that may arise in the planning status of this site, even though these have been identified by Natural England and are fairly apparent when a visual inspection is made of the site given its extensive cover with vegetation.
- 2.44 Furthermore, the constraints of the Little Park Farm Site are identified, and it is acknowledged that this may not meet all occupier's demands. This is supported by the Site Assessment Addendum (Document EMP002) which states that the site would likely only be suitable for:

relatively low traffic generating uses and low site density occupiers

- 2.45 Despite the constrained access, which limit the site's appeal to the market, this site is to be allocated (policy E4c), even though this is not consistent with the Council's Vision to provide employment land that is attractive to the market. Land adjacent to Down Barn Farm/Spurlings Industrial Estate has no such constraints with a much more straightforward access and connection to the nearby motorway network, scoring highly in respect of market sentiment and attractiveness, yet this has been discounted as a potential allocation.
- 2.46 There are clear failings in the site assessment document and the process of allocating sites has not used a consistent or necessarily suitable criteria, especially when compared to the Vision for the Local Plan and the requirements of the Framework.

12. Are the sites allocated for employment uses soundly based: are the stated capacities achievable; are the site-specific requirements justified and effective; is there evidence that there are no insurmountable constraints to the development coming forward?

- 2.47 Of the sites that are allocated in the draft Local Plan, the sites at Solent 2 and Little Park Farm are already allocated in the current Development Plan but have not yet been brought forward for development due to their material constraints and lack of market attractiveness.

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- 2.48 Solent 2 has previously benefited from planning permission for office use, which was granted in April 2008. No development has occurred to provide employment premises on the site since the grant of this permission. Bizarrely, the representations on the Draft Publication Plan from the owners of the site (Ref: 1712-31254 within document CD007 Part 1, at page 106) state that there is significant demand for employment land and that a number of enquiries have been received from interested parties in taking premises at the site, however this interest has not translated to any activity to help meet employment needs in the area for 14 years.
- 2.49 The site is covered by areas of Ancient Woodland, Protected Trees and areas of Priority Habitat in the form of deciduous woodland and lowland meadow, as confirmed by Natural England's response about the site to the Draft Publication Plan (Page 823 of document CD007 Part 1 from their response dated 18 December 2020). It is also understood that the site provides habitat for a number of species including bats and a slowworm population that need to be translocated. There are also services that cross the site that will constrain development and a watercourse that any development will need to address.
- 2.50 The Evidence Base that supports the Local Plan clearly sets out that there is a need for sites to come forward for general employment uses for light industrial, industrial and warehousing/distribution.
- 2.51 If Solent 2 is to come forward for an alternative use to offices then a new planning application would need to be submitted. If general industrial units are to be accommodated on this site, then they would require larger regular plots to accommodate such units, with associated service yard and car parking in a format that is attractive to occupiers. Securing a layout of this nature with larger, regular development plots will be impossible to accommodate given the various constraints at the site, especially once the requirements of draft policies NE1 and NE2 are taken into account which respectively require the protection of priority habitats and the provision of a 10% net gain in biodiversity.
- 2.52 The access to the site is also adjacent to a residential area which will be sensitive to HGV movements and activity in the night time period, which is a requirement of high-quality employment sites to provide flexibility for occupiers. This is considered to be a further constraint to B2 or B8 development at this site, which are uses that typically require the ability for 24/7 operations.
- 2.53 Despite high levels of demand, the lack of activity on this allocated site since the grant of planning permission in 2008 does not inspire confidence that the site will come forward in this next plan period. There is also little confidence that the site can accommodate the type of employment premises required in Fareham to meet identified needs or that the stated capacity of 23,500 sq m can be achieved whilst also complying with the requirements of the allocation or other policies within the draft plan.
- 2.21 It has had permission for B1 use but the landowners insist it is appropriate for B8 use, but it has not come forward despite significant regional interest from occupiers across the industrial and warehouse sectors. The site is adjacent to an existing residential area along Arabian Gardens so noise impact and disturbance from vehicle movements may affect operations at the site, particularly if 24/7 use is needed.
- 2.22 The site at Little Park Farm has a significant access constraint using a single track access under an existing bridge that provides a width of 3.1 m and a height that would not easily allow HGV's to pass underneath. It is understood that the land owner of this site has agreed the principle of increasing the width of the single track road with the Highway Authority and also of adjusting levels through the bridge to increase the maximum clearance that should allow easier access for HGV traffic.
- 2.54 The one constant that cannot be altered, however, is the width of the access through the bridge. A traffic and pedestrian control system using traffic signals would therefore be needed to ensure that oncoming

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- traffic or pedestrians and cyclists do not meet each other. No detail has been seen of any such signal arrangement, but this would still act as an impediment for the site access. Details of the bridge width following the works to improve clearance are set out in the landowner's representations as included in document CD007 at page 719.
- 2.55 Standard dimensions for HGV tractors are generally 2.55 metres wide whilst trailers can be up to 2.6 metres wide. These dimensions do not include wing mirrors that project further from the side of the vehicle and provide a further consideration for drivers when navigating constrained spaces. The improved access provision would therefore still provide limited clearance for larger vehicles in terms of width.
- 2.56 In combination, the limited width and incorporation of a signalised access to the site under the bridge would affect the attractiveness of this site to some occupiers. The risk of bridge strike, signal failure or a vehicle becoming stuck under the bridge are all factors that would affect market perception, especially if occupiers have a range of deliveries from various companies who may not be familiar with the road layout and want to service using a variety of vehicle type and size.
- 2.57 Again, the Little Park Farm site has remained undeveloped since its allocation in the current Local Plan, and whilst the landowner seems committed to bring this site forward in this next plan period, the site is not considered to be a high-quality site that will be attractive to all sectors of the employment market for general needs employment.
- 2.58 The sites at Daedalus are considered to be relatively free from constraints, but it is acknowledged that these are more likely to come forward for more local needs or high tech uses associated with the adjoining airport (document EMP001 para 5.24) so the site will be unsuitable for occupiers requiring B2 operations that may be less suited to an aviation environment or require more direct access to the motorway network. Even with the provision of the new relief road, the site is still too far from the M27 to be attractive to many occupiers. The site is 6.3 km from the nearest junction of the M27.
- 2.59 The delivery of the employment land component at Welborne is problematic for a couple of reasons. Firstly it requires vacant possession of an existing employment area, which will displace 13,680 sq m of employment floorspace, and the current occupiers are being granted new ten year leases; and secondly to form a high quality employment site it requires the construction of a new all ways junction at Junction 10. Whilst Welborne now benefits from planning permission, the funding package for the highway works is not yet fully agreed and work has not yet commenced and this is now many years behind schedule. The latest update from the County Council about delivery of the upgrade to Junction 10 of the M27 notes that this is expected to start in 2023 but is still subject to confirmation of funding and an approved design being in place (March 2022 update from Hants CC in Appendix 2 of this statement).
- 2.60 The Council admit that much of the employment land at Welbourne and indeed Daedalus, will only come forward towards the end of the Local Plan period (para 6.12.2 of the Submission Plan), and there is still no defined start for the required infrastructure works that the Council Evidence Base acknowledges is critical for occupiers to take the Welbourne site seriously as a viable employment location (Document EMP001 paragraphs 5.7 and 5.16).
- 2.61 Given the constraints for the sites noted above and the lack of certainty about delivery in a timely manner, it is apparent that not enough high quality, deliverable employment sites with good access to the M27 are being allocated in the Plan t
- 2.62 Some local businesses will need to find new premises to facilitate vacant possession required to facilitate the Welbourne development.

2.63 Therefore, until such time as additional land is allocated in the right locations, the Plan cannot be considered to be Sound.

Appendix 1



TJ Waste & Recycling Ltd
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Councillor Sean Woodward
Leader, Fareham Borough Council
Civic Offices
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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 existing 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

A handwritten signature in black ink, appearing to read 'John Gosling'.

Managing Director
T J Waste & Recycling Ltd

Appendix 2



TJ Waste & Recycling Ltd
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Councillor Sean Woodward
Leader, Fareham Borough Council
Civic Offices
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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

A handwritten signature in black ink, appearing to be 'John Gosling', written over a light blue circular background.

Managing Director
T J Waste & Recycling Ltd