



CH/MH/HP13023

Date 10 March 2015

Planning Strategy
Fareham Borough Council
Civic Offices
Civic Way
Fareham
PO16 7AZ

Dear Sir/Madam

**FAREHAM BC DEVELOPMENT SITES & POLICIES: MAIN MODIFICATIONS
WYG FOR MR GRAHAM MOYSE (LAND NORTH OF JUNCTION 11 OF M27)
RESPONDENT REF: DREP389**

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

DMM12 - Table 3: Clarify the Supply of Employment Floorspace

It is clear from Table 3 that no additional employment sites are proposed for allocation within the Main Modifications to the Fareham Local Plan Part 2. This is a major oversight in the Plan, and following our previous comments it is not considered to be positively prepared in accordance with Paragraph 21 of the NPPF.

The Council should not rely on any development coming forward at Little Park Farm or Welborne over the plan period to 2026, as both employment areas have considerable deliverability issues. In the scenario where these two proposed allocations are removed from the Local Plan Part 2, the surplus is reduced from 35,690 square metres to just 8,590 square metres. This is a precarious position, given that the Solent Strategic Economic Plan has identified a shortfall of 370,000 square metres (4 million sq.ft.) of warehouse and distribution space in South Hampshire.

Moreover, after a lengthy debate at the Examination about open storage uses, coupled with the submission of our recent representation, it appears that the Council has not given due consideration to the lack of sites for open storage within the Borough. This is a major flaw of the Plan, particularly as the Paper DCD-22 (December 2014) stated that *"The Council has not been presented with evidence to demonstrate that there is a market for such uses [open storage] that cannot be accommodated in existing sites or on one of the allocations in the LP2, especially in light of the previously mentioned surplus."* This evidence was provided in January 2015 by my client (Document Ref: DREP389-002), clearly demonstrating that there is lack of open storage sites in Fareham now, and that there is a clear preference for my client's site at Land North of Junction 11 of the M27.

The Main Modifications are therefore not positively prepared and will not be effective over the development plan period. The Main Modifications should be altered to include my client's site as there are major issues with the nature and deliverability of the existing employment allocations to deliver open storage uses in the short term.





DMM15 - Little Park Farm Employment Site

The inclusion of Little Park Farm as an employment allocation within the Plan is still disputed. The site was allocated in the Fareham Borough Local Plan Review, June 2000, and therefore has not been developed for nearly 15 years. The site is constrained by the railway bridge arch, and the timing of its implementation continues to be pushed back. There is no guarantee of delivery, and the previous 15 year time period provide strong evidence to support this lack of implementation. As a consequence, the Local Plan Part 2 requires additional sites to be allocated, especially to meet the shortfall identified within the Solent Strategic Economic Plan.

The inclusion of Little Park Farm is therefore not justified and will not be effective, as there are alternative sites such as my client's land that can be delivered over the plan period.

Summary

The evidence previously submitted by my client has not been taken into account in the formulation of the proposed Main Modifications to the Local Plan Part 2. Therefore, the current draft plan does not provide sufficient flexibility in terms of choice and location of employment sites in accordance with Paragraphs 7 and 21 of the NPPF, especially as sites for open storage uses are not readily available.

My client's site to the north of Junction 11 of the M27 is an appropriate employment site that should be allocated within the Local Plan Part 2 and form part of the Main Modifications.

Yours sincerely

A solid black rectangular box used to redact the signature of Martin Hawthorne.

Martin Hawthorne

Director

For and on behalf of WYG

cc. Graham Moyse
Ian Judd