

**Issue 4: Wednesday 12<sup>th</sup> November 2014. REP NO: DREP400**

**Fareham Local Plan Part 2: Development sites and polices – issues and questions**

**Issue number 4: employment (including development site briefs) (DSP17 – DSP19)**

**Responses to Inspectors Questions by Chris Corcoran, Southern Planning Practice on behalf of Mrs Sibley and Family and others.**

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

Response: The Local Plan fails to conform to National Guidance in its allocation of further sites. Firstly in “Plan Making” NPPF para 152 requires LPAs to avoid significant adverse impacts on environmental dimensions and look for alternative options wherever possible. In FBLP, DP18 sites which minimise impacts do not appear to have been investigated systematically. Firstly, all of the sites affect SINC and /or woodland, secondly, not all possible alternatives were investigated (e.g. land north & east of Segensworth Road) and thirdly the sustainability analysis does not appear to include a comparison on the scores in the summary Sustainability Analysis.

Secondly, element is conflict with NPPF (para 7 bullet 3; and para 17 bullet 3 and para 22) as the plan does not appear to have considered land in terms of attractiveness to the market. For example the land to the north east of Segensworth Road has on several occasions promoted for economic development, most recently by Dobbies the market leaders in garden centres.

Thirdly. The Local Plan focusses on employment in the supporting studies of Wessex Economics Ltd and PUSH reports and studies. By contrast the NPPF, under the heading of business “refers to” economic development including the needs for “all foreseeable types of economic activity” (paras 160 & 161 & 18 - 20)

It is difficult to see how allocations derived from population data and then converted into floorspace and categorised in terms of the standard B use classes properly address the intentions of para 161.

Fourthly; NPPF para 7 requires the provision of “sufficient land of the right type and in the right place”. FBLP2 applies the test of “sufficient” but not of the other two of criteria. This

can be seen in the Employment Land Review 2013 para 6.4.1 and 6.4.2 that the analysis of this site was carried out on superficial policy grounds and after FBC had selected other sites.

Question 4.2 – Has the council attached appropriate weight to the findings of the Fareham Employment Study – final report (2014)? (FES 2014)

Since the publication of the FES2014, the two further documents have been published, both by the Solent Local Enterprise Partnership (LEP) namely “Transforming Solent; Solent Strategic Economic Plan 2014 – 2020” (SEP) and “Transforming Solent; Marine and Maritime Supplement” by Admiral Rob Stevens (SMMS). Following the closure of ship building in Portsmouth Dockyard the Government appointed a Minister for Portsmouth. These two documents are part of the urgent response of the LEP to Government to the loss of investment, economic activity and employment result from closure of the ship building facilities within Portsmouth Dockyard represent. The closure of the Ford Transit manufacturing facility at Southampton took place not long before. (SEP pp 33 & 34). SEP identifies the opportunities for new investment and employment and boosting enterprise in the most appropriate way. SMMS then looks in detail at the marine and maritime sector already identified as the largest single component of the South Hampshire Economy. Neither FLP2 or PUSH address the new situation created by the Government’s intervention or, the leadership and initiative of LEP.

The supply of land for development is one of the points highlighted within SEP (pp 17 & 19). It summaries the agreed position which is Policy 1 in PUSH South Hampshire Strategy 2012.

1. Cities first
2. Until around 2015 development should be concentrated on sites within urban areas and existing Greenfield allocations. **From 2015** development should be concentrated on urban sites such as Welbourne and **in urban extensions**. (my highlighting)
3. The timing and phasing of major developments in greenfield locations should not detract from or compromise development in the cities and other existing urban areas, subject to this not resulting in major economic development being lost in South Hampshire.

The SEP also identifies inward investment as key to replacing what has been lost. It states “the Solent has many compelling selling points but our competitors are making the same case and investing in supporting that. The fact that key competitors appear to be attracting

more investment indicates that their strategies may be leading to that success. This assessment points towards a required change in delivering FDI in the Solent... The Solent risks being left behind by continuing to deliver on a predominately reactive basis.” (pp 51 & 52)

The objectives for land indicate the unlocking of key sites and delivering commercial floorspace which helps meet market demand (SEP is very focused upon those sectors with potential for growth) particularly the marine, maritime and advance manufacturing sectors of the economy.

SEP identifies (pp 37 & 64) that the Solent has the opportunity to take advantage of the rapid global growth in port centered logistics. Studies for PUSH in 2008 and 2010 identify the potential shortfall of 4million sq.ft of warehouse and distribution space in South Hampshire up to 2026 and generate up to 3,000 jobs. To compete with other ports, particularly the new DP World facility at Thames Gateway, the Solent needs to radically improve the supply of distribution and logistics space in the area. This is restated in SMMS 4.2.

This is not a matter which is addressed by the FES or Local Plan part 2 DSP.

The FES addressed the logistics requirements only on the basis of B8, i.e. that component floorspace allocated to Fareham by the PUSH strategy 2012. The PUSH approach and the allocation of B8 floorspace to Fareham is not an adequate response to the shortage of Port Centered Logistics. Admiral Stevens notes in SMMS section 4.2 “there has however been little action since the commissioning of these reports which will damage the Ports’ International competitiveness in the future” and “industry partners points to opportunities for the development of Port Centered Logistics across a number of sites round the Solent. He gives examples: Dunsbury Hill Farm in the east of the LEP and Adanac and Ford in the west. He calls for objective sites appraisal as a first step. (**Note:** Adanac is subject to planning policies which do not include logistics, no policy has been agreed for the Ford factory).

The FLP2 has no recognition of this problem nor proposes a solution nor identifies sites which could provide a suitable contribution to meet this need, whether in the short or longer term.

Question 4.3 – The Core Strategy includes a requirement for 41,000m<sup>2</sup> between 2006 and 2026 (csi) The FES recommends a requirement of 100,000m<sup>2</sup>.

DSP 18 allocates 5 new sites totalling 43,000m<sup>2</sup>, but most with restricted use. Site 1 Solent 2 (the largest) is identified by FES as an office / business park development and consent has been granted or 23,000 sq.m of B1a. Site 5 (the walled garden at Cams Hall) is constrained by nature conservation and historic fabric and by the quality of existing development. Both Kites Croft and Midpoint are small sites, with trees and other features, adjoining modern commercial buildings with SINC's adjoining; Midpoint borders a strategic gap and the conservation Area of Titchfield Abbey. The other larger site Little Park Farm is a narrow long site with the embankment on one side and the M27 on the other with high levels of noise and visibility. It is proposed in FES for the more specialised uses for which no alternative provision has been made within the Local Plan and by the owner for waste operations. These five sites provide the only greenfield land within Fareham other than at Daedalus (the Solent Enterprise Park). This site is not suitable or attractive for all types of user. FES notes that it is not close enough to the motorways to attract logistics other than ones serving the Enterprise Park itself.

All of this points to the need for a greater variety of site to deliver the “sufficient” land as delivery of the LEP strategy land and that of the NPPF sees that the setting up of new expanded enterprises is the central objective, for which suitable land is required. Investment by local and incoming firms are provided with the type of sites that they want. To meet the needs of the market a greater variety of sites, particularly those relatively easy to develop should be provided. The palette of sites provided by the Local Plan Part 2 is too constrained and delivery too uncertain.

Despite identifying the need for 100,000m<sup>2</sup> of new land. FES qualifies the need in several ways. The FES refers to the availability of employment space in the adjoining districts as well as the surplus of space in PUSH as a whole. It relies on both the Enterprise Zone (Daedalus) and Welbourne to achieve the surplus within Fareham itself.

However, it does not look at the whole picture which appears less favourable to the supply of employment land than FES and FLP part 2 indicate.

1. Winchester – Solent 2 is part of the Whiteley Development and is in Winchester. Whiteley however is to accommodate 3500 extra dwellings, Bishops Waltham up to 500 and Wickham, Swanmore and Waltham Chase approximately 250 dwellings

each. Apart from the 1ha of Little Park Farm south of M27, the only Winchester employment allocations are in Winchester City itself (Bushfield 20ha) and the employment associated with the Waterlooville area in the extreme east of the Winchester district. Moreover the Whiteley Solent 2 is again focused on B1a

It does not appear to be B8 and B2 or more general industry.

2. Eastleigh Borough is also contiguous to Fareham; FES does not refer to its proposal. The Eastleigh Local Plan (now at examination) makes employment allocations in the Eastern half of the district but these only balance losses elsewhere in the borough. The Eastleigh allocations include Riverside as a strategic allocation. There has been no substantial progress in over 20 years. It is held back by the cost and complexity of infrastructure, the multiplicity of ownership and the substantial existing range of large space users. Reduction in Government funding makes redevelopment of Riverside less likely. A business park in the north east of Southampton airport has been one casualty. Meanwhile, Eastleigh is to provide 10,000 dwellings of which the majority is to be within the eastern half of the Borough, from which there is already substantial commuting into Fareham.
3. Southampton – Within Southampton, there has been substantial net loss of both employment and employment land. The most high profile have been Vospers in Woolston, Ford at Swaythling and BAT at Shirley. There has been steady loss of employment land to housing e.g. BAT and Woolston. The office market in Southampton on which PUSH places so much reliance – “Cities First” - is not delivering. The office market in Southampton has never been buoyant and is currently not profitable.

Since the Government amended the Use Classes Order to allow the change of use of offices to residential there has been a steady loss of offices. Monitoring reports for 2013 – 2014 by other councils indicate a substantial take up of these rights. In Harrow, for instance not only of secondary office property but for prime space has been converted. Anecdotal evidence of conversions in Southampton indicate that this should be a significant element in calculating the supply of employment land.

## **PUSH Scenario's**

The FBLP places substantial reliance on PUSH to justify the limited allocation of employment land.

We have seen from the above that there are a number of limitations to the PUSH economic strategy of 2012. Firstly 2 key strategic areas are not delivering, namely City First in Southampton and Riverside in Eastleigh. Secondly, the PUSH strategic plan is not adequately monitored. Thirdly, the basis of these policies appear primarily policy driven in the desire to protect the Southampton City Centre and its wish to redevelop and upgrade Riverside. However, these are not primarily designed to maximise the development of the economy and the approach of PUSH appears primarily employment based and sectoral or economic as the NPPF is.

However, it will be noted that the South Hampshire Strategy of October 2012 indicates shift from "City First" after 2015 to urban extensions and to growth areas. Of the growth areas it will be further noted that Welbourne is not due to deliver employment land until the early 2020's.

## **Hiatus in allocation in new land**

Throughout the 1980's and 1990's there was a variety of employment land in Fareham available for development. In addition to Whiteley, Segensworth land much of it owned and promoted by Hampshire County Council provided for the expansion of local firms and for incoming firms as well. In contrast to these generous allocations for land which have all now been developed for their purpose, the last 10 years have seen almost no allocations of employment in Fareham, Eastleigh or Winchester. Development of Daedalus has been held back by changes in administration and lack of investment.

## **Conclusion**

A wider range of sites is required for if Fareham is to deliver adequate land at the right place and at the right time to meet market demand particularly in 6 - 8 years before Welbourne employment is developed and while large scale housing proceeds at Welbourne, Whiteley and in the eastern part of Eastleigh.

**Question 4.4 is policy DSP17 sufficiently flexible and reflective of the advice in the NPPF (e.g. para 22)?**

Question 4.9 are the employment allocations based on a sound assessment of land availability and deliverability?

The answer to this question is set out in the comments above, I have no additional comments on the sites as allocated other than (a) in aggregate the total greenfield area is only approx. 15ha and the sites small, (b) the possible uses are constrained, (c) none is suitable for logistics. They are unlikely to provide adequately for the economic needs of Fareham and the LEP. More land and a greater variety of sites is required to provide for the economic needs of the area.

Question 4.9(ii) Would the development of the land between Southampton Road and Segensworth Road be sound. The objection area identifies an area of about 16ha and includes 3 separate areas which are:

1. A group of redundant small holdings extending along the Southampton Road - approximately 5.5 ha.
2. Central area; mostly SINC along the line of a small drainage ditch / stream but including a garden centre, caravan site and 2 houses - 6.00 ha
3. A number of very long gardens, small paddocks related to housing fronting Segensworth Road – 4.5ha.

Area 1 provides the potential employment land. This can be developed independently from the remainder. This land has no amenity value, it is unsightly it is not productive, it has no nature conservation designation. It has all services available to it. It is surrounded by intensive urban development. There is no doubt that this land will be developed at some time in the future. The only bar to its development is Fareham's policy stance which is not evidence based.

Question Has the site been subject to adequate sustainability appraisal?

FBC appraised a number alternative sites but for some reasons not this one. This is odd because the land has been submitted for a SHLAA and identified by FBC as a potential

development site in an earlier draft of FBLP. A sustainability appraisal is attached in the same form as selected employment sites. This site scores more highly than any and has fewer constraints on costs development. The requirement to allocate is a minimum not a maximum; a plan does not become unsound if land in excess of forecast need is allocated.

Question Has the site been subject to Appropriate public consultation?

This is not land which is kept open as a result of public demand or public interest. It has no public function, public rights of access, no aspirations for public use, its designation as a “green finger or lung” is as far as I am aware a unique designation with no policy overtone of significance or supported by any other objective e.g. core strategy or NPPF or public demand.

My clients will make the central block available and wish to develop. They are not themselves developers and there is no parish council. It is not clear what appropriate public consultation would compromise in this case. Its removal as a small development site was not as a result of public comment or response. Both the sustainability appraisal and public consultation are in this case adequate to meet the requirements of the NPPF.

Question 4.10 The Development Site Brief – it should be noted that apart from not including any information on floorspace there is no date given for the time for delivery.

Concluding Section

This representation focusses on part of the objection site (5.5ha) as being suitable for immediate commercial use.

(a.) Chapter 5, DP18 is unsound

(b.) Not positively prepared; development requirements not:

- a. Tested against market demand
- b. Does not address recognised shortfalls especially for logistics
- c. Does not supply adequate variety of sites to ensure delivery
- d. Does not provide extra 100,000m<sup>2</sup>
- e. Does not take into account the failure of 2 key elements of the PUSH strategy, Southampton office supply and Riverside
- f. Does not consider suitable alternative sites within lower environmental impact

(c) Not in accord with Government Policy (see answer to Q4)

Changes Sought:

Amend DP18 to include 5.5ha land for B1(a), B2, B8 or other employment uses.