

[Redacted]

**From:** [Redacted]  
**Sent:** 08 December 2017 15:34  
**To:** Consultation  
**Subject:** FW: Written Representations - Cams Hall - Draft Fareham Local Plan  
**Attachments:** Local Plan Review Developer Downloadable Form - Written Representations - Wilky Group 08.12.17.pdf; Written Representations - Wilky Group - Response to Draft Local Plan Consultation 08.12.17.pdf

[Redacted]



**From:** [Redacted]  
**Sent:** 08 December 2017 14:23  
**To:** [Redacted]  
**Subject:** FW: Written Representations - Cams Hall - Draft Fareham Local Plan

[Redacted]

*Local Plan policy  
E3*

**From:** [Redacted]  
**Sent:** 08 December 2017 14:00  
**To:** Consultation <Consultation@Fareham.gov.uk>  
**Cc:** [Redacted]  
**Subject:** Written Representations - Cams Hall - Draft Fareham Local Plan

Dear Fareham Borough Council,

Please find attached written representations submitted on behalf of our client, Wilky Group, in relation to Cams Hall, Fareham.

We trust that the attached is clear but if you do have any further questions please do not hesitate to contact me in the first instance.

A copy of the attached has also been put in the post today.

Adam/Claire – given our recent discussions in relation to Cams Hall I have copied you both in for reference. Thank you both for your advice to date.

Kind regards,

[Redacted]

[Redacted]  
Associate Director



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8 December 2017

**Delivered by email and post**

Planning Policy  
Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
Hampshire  
PO16 7AZ

Ref: WILW3015

Dear Sir/Madam,

## **REPRESENTATIONS IN RESPONSE TO FAREHAM DRAFT LOCAL PLAN 2036**

This letter has been prepared on behalf of our client, Wilky Group, in response to Fareham Borough Council's Draft Local Plan 2036, which was published for consultation on Wednesday 25<sup>th</sup> October and is due to end on Friday 8<sup>th</sup> December. The written representations enclosed follow on from discussions held with representatives of Fareham Borough Council on 23<sup>rd</sup> November 2017 and relate to Cams Hall, Fareham in relation to emerging Policy E3 (*Employment Areas*) of the Draft Fareham Local Plan.

Specifically, these representations outline the need for a supportive emerging planning policy position that provides the flexibility for a broader range of uses to be considered for Cams Hall in the future. At the current time, Cams Hall is protected in planning policy for employment uses however, alternative uses may need to be pursued by our client in the future in order to continue to safeguard the long-term conservation of the Hall as a Grade II\* Listed heritage asset and enable our client to respond to changes in market demand.

### Site Context

Cams Hall forms part of the Cams Estate, which is situated to the south east of Fareham Borough in between Porchester and Fareham. The Hall is registered as a 17<sup>th</sup> Century Grade II\* Listed Georgian mansion which has an extensive history dating back to 1086 and is referenced in the Domesday Book. The immediate land surrounding Cams Hall is documented as a Historic Park and Garden and sits within the wider Conservation Area that encompasses the Cams Estate.

Other key uses within the Estate include the Cams Hall Estate Golf Course and Cams Estate business park, the latter of which initially formed around a group of buildings adjacent to Cams Hall known as Home Farm and have now been converted for office use. In planning policy terms, Cams Hall forms part of the employment allocation at Cams Estate business park although the character and physical appearance of

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Cams Hall is significantly different from the converted farm buildings within the business park and this is reflected in its Grade II\* Listed status.

## Current Uses

Cams Hall has been extensively refurbished and was purchased by Wilky Group in 2000. The Hall currently provides high quality, serviced office accommodation to businesses and is also used as an events and wedding venue. Cams Hall is operated by Parallel Business Centres Ltd, a subsidiary of the Wilky Group, who also provides similar serviced office accommodation in two other locations in Surrey at Fetcham Park and Parallel House.

## Flexibility of Use

Cams Hall has operated successfully in providing serviced office accommodation since its purchase by Wilky Group. However, whilst this may be the current position, the nature of office space and the needs of the businesses who occupy such spaces have evolved. This is in response to increasingly flexible working arrangements (such as home working) and technological innovation, both of which have enabled employees to work from a multitude of locations outside of the conventional office environment. These changes are likely to have implications on the demand and space requirements for serviced office accommodation in the future.

In order for our client to respond quickly to these changes in market demand, flexibility is needed within emerging planning policy so that our client can consider a wider range of uses for Cams Hall should demand for serviced office accommodation decrease in the future.

Since its purchase by our client, Cams Hall has undergone a series of refurbishments in order to convert the property to provide high quality, serviced office accommodation. This has also included a significant amount of capital investment in the maintenance of the Hall in order to preserve the Grade II\* Listed Building, which is a significant heritage asset for the Borough. Overall, these maintenance costs have exceeded the income generated and longer term there will be a need to secure a more profitable use for Cams Hall in order for our client to continue with their efforts in safeguarding the conservation of the Hall in the future.

An additional consideration is also the increasing local competition in the provision of serviced office accommodation from other providers, such as Regus and Arena Business Centres, which can provide competitive rents and therefore may reduce the demand for serviced office accommodation at Cams Hall in the future. Further competition may also arise as employment sites within the Borough are developed for office uses, such as opportunities at Welborne, Solent Business Park and the second Innovation Centre planned for the Solent Enterprise Zone at Daedalus.

## Planning Policy Position

Within adopted planning policy, Cams Hall forms part of the employment area known as 'Cams Estate' business park and is covered by Policy DSP17 of the Fareham Local Plan Part 2 (adopted June 2015). Within the emerging Draft Local Plan, the proposed new policy position covering the development of existing employment areas is covered by Policy E3.

Policy E3 states:

*The Employment Areas as shown on the Policies Map will be protected for employment uses within the use classes B1, B2 and B8.*

*Proposals for the extension of new buildings and intensification of land for employment uses within an existing Employment Area will be supported where it can be demonstrated that:*

- a. it would facilitate the creation of additional jobs; and*
- b. it would not have an unacceptable impact on the amenity of neighbouring uses, on the landscape or on highways;*
- c. car parking is provided in accordance with the Non-Residential Parking Standards SPD; and*
- d. The design of any new buildings accords with the requirements of the design policies.*

*Proposals for the change of use or redevelopment of vacant land and buildings to uses other than B-class employment (excluding residential) within an Employment Area will be permitted where policy requirements a-d above are demonstrated together with the following:*

- e. all appropriate alternative forms of economic development have been considered; and*
- f. it can be clearly demonstrated that the land or building is not fit for purpose and modernisation or redevelopment for employment uses would be financially unviable; and*
- g. the proposal is accompanied by details of marketing of the vacant site / building covering a period of not fewer than twelve months.*

Emerging Policy E3 does not provide the flexibility needed by our client should a change of use at Cams Hall be sought in the future for the reasons aforementioned. Whilst Policy E3 recognises that market conditions can lead to the need for employment sites to diversify away from B-class employment uses (excluding residential), in order to take advantage of this positive part of the policy several other policy criteria must be met, which are considered over burdensome for our client.

Specifically, our concerns relate to part (g) of the policy which requires that any proposals for a change of use will only be considered in the event that Cams Hall is vacant and accompanied by details of marketing the building for a minimum period of twelve months. This would require marketing Cams Hall for sale or for rent and is not an option our client would wish to consider. Needing to comply with this part of the policy will not enable our client to respond proactively to changes in market demand and take advantage of opportunities as they arise, which may be in the best interests for securing the long-term conservation of Cams Hall.

Part (f) of the policy also requires proposals to clearly demonstrate that Cams Hall is not fit for purpose and that modernisation or redevelopment for other forms of employment uses would be financially unviable. This would mean that all employment uses would have to be considered and assessed in terms of their financial viability before other uses could be considered. This part of the policy is considered over burdensome for our client and, coupled with part (g) of the policy and the additional requirements outlined in the supporting policy text in paragraphs 6.25 and 6.26, could result in significant delays to other non-employment opportunities being considered.

We also note that reference has been made to paragraph 22 of the National Planning Policy Framework (NPPF) in paragraph 6.23:

*"where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses for land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities".*

Our view is that the over burdensome nature of Policy E3 does not accurately reflect the requirements of paragraph 22 in the NPPF. We request that the aspirations of our client to consider alternative uses for Cams Hall in order to ensure a sustainable form of income for its long-term conservation be treated as a market signal.

Whilst we recognise that changes to Policy E3 can be requested through this consultation process we also recognise that there is a need for a robust policy position which protects employment sites within the Borough. However, our view is that this employment policy should not apply to Cams Hall given that its character is distinctly different from the buildings within Cams Estate business park and that Cams Hall is an important heritage asset with considerable maintenance costs which warrants further consideration of other, more viable, uses.

We therefore request that Cams Hall is disaggregated from the Cams Estate employment area and that this is reflected on the emerging Local Plan Policies Map.

*A part of the evidence base EV31*

Background Paper: Interim Employment Land Review (October 2017)

We note that an Interim Employment Land Review has been undertaken as part of the Evidence Base underpinning the Draft Fareham Local Plan. The Review includes those sites that are considered to be the major employment areas within the Borough and these have been recommended for protection following a broad interim assessment (Table 5, pages 23-27). Cams Estate, including Cams Hall, has been assessed as a site to be protected.

We understand from paragraph 3.32, page 23, that a more detailed scoring assessment of individual employment sites to be retained or discounted for protection for employment purposes is to be produced following a further detailed review of sites and their suitability for B class employment uses as part of the Evidence Base supporting the Regulation 19 publication version of the new Local Plan, the consultation for which we understand is expected to take place in Summer 2018.

We request that as part of this process detailed scoring assessments are undertaken separately for Cams Hall and the Cams Estate business park so that fair consideration can be given as to whether Cams Hall is still suitable for retention within the wider employment area. We also request that further information is disclosed to our client on the assessment criteria used as part of this scoring process.

We also note from paragraph 3.31, page 23, that a number of smaller sites have already been reviewed and considered not suitable for protection for employment uses. Whilst some of these sites contain small scale businesses they have not been considered as strategic in nature and thus the review concludes that alternative uses can be considered for these sites if it is the desire of the market. We wish to highlight that in our view, Cams Hall in isolation is not a strategic employment site for the Borough and that there is a desire within the market, as indicated by our client, for other uses to be considered in order to ensure the preservation of the building in the longer term.

## Heritage

Cams Hall is a Grade II\* Listed Building and is therefore an important local and national heritage asset. Paragraph 126 of the NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment and in doing so should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

Given this emphasis within the NPPF on the need to conserve such assets we argue that the starting point for considering suitable future uses for Cams Hall should be on the basis of the use which best secures the conservation of the asset in the longer term and should not be prejudiced from doing so by an employment policy which restricts all other non-employment uses being considered.

This reinforces our view that there is a need for Cams Hall to be disaggregated from the wider Cams Estate employment area so that a wider range of uses can be considered in the future if needed. We wish to highlight at this stage that a residential use is not under consideration by our client.

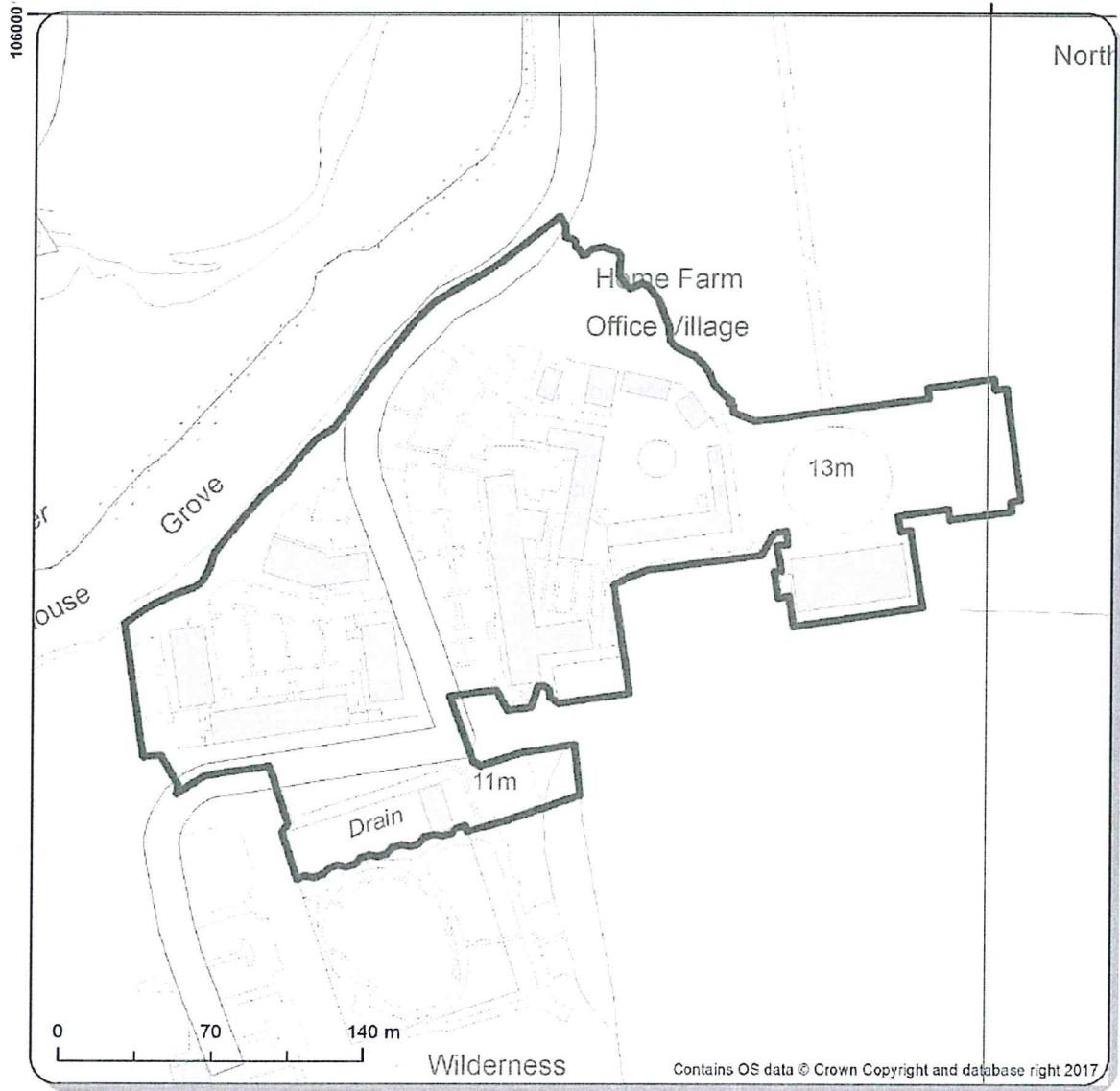
We thank the Council for this opportunity to comment on the Draft Local Plan and look forward to further dialogue on the matters highlighted in our representations.

Yours sincerely,

Fay Eames  
**Associate Director**

[fay.eames@turley.co.uk](mailto:fay.eames@turley.co.uk)

### Appendix 1: Existing Cams Estate employment area





## Appendix 2: Proposed amendment to Cams Estate employment area showing the disaggregation of Cams Hall

