

Local Plan Part 2: Development Sites and Policies Plan

Draft Plan Response Statement

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Introduction & Purpose of Paper

The Council undertook a period of public consultation on the Preferred Options stage of the DSP Plan for a period of six weeks between 15th October and 26th November 2012. This involved a series of public exhibitions and the development of dedicated web pages to try and explain the content of the Plan. A flyer, sent to all households in the Borough, a press release and posters in public notice boards were all utilised to try and spread the details of the consultation as wide as possible.

Following the six week period of consultation the Council also undertook three, more focussed, consultation exercises on individual elements of the Plan that had been altered subsequent to the previously consulted draft. The three individual consultations were on:

1. Solent Breezes;
2. Gypsy, Travellers and Travelling Showpeople; and
3. Fareham College and additional employment sites

The purpose of this paper is to set out a complete list of all comments received during this draft stage of the Plan process. Alongside each of the comments received will be the Council's response setting out how, where necessary, the Plan has been amended.

For more information on the consultation measures took on this, and all other stages, of the DSP Plan please see the Local Plan Part 2: Development Sites and Policies Plan Consultation Statement.

Draft DSP Plan Responses

ID	Respondent	Comment	Proposed Council Response
REF 1	Private Individual	<p>Generally a well organised and comprehensive document. Ref: <u>Land Site ID 1002 Land at corner station road & A27</u>. It has previously been stated that an area of 3 mtrs from the pavement edge must be kept clear because of the water main running beneath.</p> <p>P.132 2) This area fulfils at least 3 of the criteria. Pleased to note access to this site but would hope there will be adequate parking facilities on site. Already surrounding roads are used extensively for parking during the week by people using the station. There have been some problems with utility vehicles due to the parking already.</p> <p>My comments also concern <u>Windmill Grove 1083</u>, somewhat concerned to note this is being considered despite being in a flood zone 3. P.133 With healthcare facilities already under pressure and with no foreseeable increase, should surely add caution to any proposed development.</p>	<p>Noted.</p> <p>This site is no longer being allocated for housing in the DSP Plan due to concerns over viability and design.</p> <p>The provision of adequate parking would be a key consideration in any future planning application. Access to and from the site, and the form of development will be set out in more detailed design work in either a masterplan for the site, or in any future planning application.</p> <p>This site is no longer being allocated for housing in the DSP Plan due to concerns over flooding, viability and potential impact on the SPA.</p>
REF 2	Private individual	<p>Westbury Manor is a well restored listed building and is perfectly suited to its current role i.e. Home to the museum. I object strongly to any ideas or proposals to convert it to yet another eating place. Heavens knows, there are enough pubs serving good food in Fareham and some very good restaurants.</p>	<p>The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage Assets Policy on account of its location and its Listed Building status.</p>
REF 3	Private individual	<p>I object strongly to the policy for the re-use of Westbury Manor as a cafe/restaurant for the following reasons:</p> <ol style="list-style-type: none"> West Street already contains more than enough cafes/restaurants. Westbury Manor, as a listed building of considerable historic interest and importance, is the obvious place for the museum. 	<p>The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage Assets Policy on account of its location and its Listed Building status.</p>
REF 4	Private individual	<p>The local Police Station is not manned enough so by expanding this area with even more housing will cause more difficulties. The infrastructure (roads) schools, <u>no</u></p>	<p>The Hampshire Constabulary and the NHS will have their own plans for the future of service</p>

ID	Respondent	Comment	Proposed Council Response
		<p><u>hospital</u> apart from clinics and the community hospital which is excellent. I do realise that regeneration of the area (25-26 yrs) is important but <u>priorities</u> don't seem to be mentioned.</p>	<p>and their estate. These groups have been in continual dialogue with the Council throughout the process of developing the DSP Plan.</p>
REF 5	Private individual	<p>Keep open spaces within the borough and take into consideration the needs of existing residents when giving planning permission to additional building and extensions.</p>	<p>The retention of open space is already set out in policy within the Core Strategy (CS21). The impact on the amenity of neighbouring residents is considered to be covered in the Design Policies within the Core Strategy and DSP Plan, but will be covered in more detail in the upcoming Design SPD.</p>
REF 6	Private individual	<p>My Husband & I have recently moved to a new build property in Whiteley.</p> <ul style="list-style-type: none"> - Using public transport is difficult as bus services are infrequent and do not stop near our property. Getting to a rail station, particularly the nearest involves a long journey. - We are retired on a fixed income and would like to minimise our travel costs by car but often spend a long time in queuing traffic to get onto the M27. We travel off peak but this is a problem. - We would like easier access to Fareham Community Hospital, rail links and the bank through the bus gate on Yew Tree Drive. This would save us money too. The road is little used by ineffective bus services. - We are concerned by the increased traffic when the new shops open if Yew Tree Drive does not become a through route - even if opening it at off peak times would help people without jobs. - We are concerned at the amount of traffic that will be generated when the North Whiteley development goes ahead. - Roshery Avenue needs to be completed too to provide another route in and out of Whiteley. <p>Queuing traffic creates pollution too!!</p> <p>We support the permanent opening of the Yew Tree Drive bus gate.</p>	<p>Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network.</p> <p>The bus services are run by private companies, and although the Council can encourage routes to be taken the companies will only continue to run services that are profitable.</p> <p>The opening of Yew Tree Drive is currently being trialled.</p> <p>The development of North Whiteley is within the boundary of Winchester; however there are plans to provide an extra link from Botley Road to the roundabout at the end of Whiteley Way.</p> <p>The opening of Yew Tree Drive is currently being trialled.</p>
REF 7	Private individual	<p>I am very concerned about the implications of paragraph 3.11 of the draft for consultation. It states that the Strategic Gap will no longer follow the edge of the</p>	<p>Noted. The wording of this paragraph has changed. The boundary of the strategic gap</p>

ID	Respondent	Comment	Proposed Council Response
REF 7 Cont .		<p>existing settlements to the west of Stubbington and Hill Head. This western edge of the existing settlement is bounded by the Meon Valley and any change here will be strongly resisted. The paragraph does not give any explanation of what is to change; neither do the maps at the end of the document shed any light on what is to happen.</p> <p>Please could we have an explanation ready before the exhibition arrives at Stubbington on 7 November.</p> <p>What is not mentioned is the eastern boundary of Stubbington and Hill Head settlement where Daedalus site has become a Local Enterprise Zone. A statement on its effect would be most welcome.</p> <p>Also if the possible proposal for a solar panel farm north of Daedalus is eventually accepted by the planning committee, a paragraph on its effect would be welcomed.</p>	<p>has been altered to the south of Warsash Road, but it remains to the west of Stubbington & Hill Head and extends across the Meon Valley. The boundary now follows Meon Road/Posbrook Lane.</p> <p>Daedalus was allocated as a "Strategic Employment Area" in the Core Strategy. It is not necessary to reallocate it in the DSP Plan.</p> <p>The Council has undertaken a "Renewable Energy Capacity Study" which has highlighted areas which could be suitable for different types of renewable. However, the DSP Plan will not be specifically allocating areas for renewable technology, such as Solar PV.</p>
REF 8	Fareham Area Disability Forum	<ol style="list-style-type: none"> 1) We need a com centre in FTC. 2) Proposed site is not on a bus route 3) Too far from transport links (bus & train). 4) Ped access is poor 5) Would require controlled crossing on Park Lane & Osborn Road. 6) Would need at least 100 parking spaces. <p>The prosperity of Fareham town centre will be dependent upon the following:</p> <ol style="list-style-type: none"> 1. Public access links from the New Community North of Fareham. 2. FTC parking charges and general parking policy. 3. The new Whiteley shopping centre. 4. I do not believe in the pursuit of a café culture in FTC; it is not realistic or sustainable. 5. FTC doesn't currently have the right mix of shops to encourage customers to do a weekly shop because there are no butchers, greengrocers or proper department stores. 6. Retail units should go no further west than Trinity Street; Concentrating the shopping hub would improve the appearance and vibrancy of the town centre. 7. A sit-down coffee shop in or near the train station would be good. 	<p>The proposed site for a Community Centre is just one option that is being considered. Accessibility, parking and safety of potential users will be key considerations in identifying a preferred site.</p> <p>These opinions are noted. The parking charges have been reviewed recently. Access to the Welborne will be highly important and the BRT route will provide connections. Fareham has an excellent pedestrianised area that can be exploited through extra A3 units, and recent trends show that the "café culture" is one of the few retail elements that are continuing to expand despite the recession. The mix of shops cannot be controlled, only the use classes. The DSP Plan tries to retain as high a proportion of A1 "shops" as possible,</p>

ID	Respondent	Comment	Proposed Council Response
REF 8 Cont .		8. The BRT route should run down West Street; The Western Way bus lane is not working. I recommend that the Council read and adhere to the report written by Mary "Queen of Shops".	but it is impossible to influence the mix of retailers (i.e. clothes shops, bakers, grocers etc), which comes down to market forces. The independent shops between Trinity Street and the Station offer good start up premises for new businesses and should be protected for this purpose. The redevelopment of the Station site should provide a café unit. The Council is aware of the Portas report and have taken on board a number of recommendations from within it.
		The occupancy rates are only low because of the parking charges. They should be lowered.	Parking charges in the Town Centre have been reviewed.
		<ol style="list-style-type: none"> 1. The library could be moved to the vacant units in the Mall and the existing building could become the community centre. 2. Ferneham Hall should be updated. 3. Relocating the Civic area to market quay would create even more traffic congestion on the roundabout and dissuade people from visiting. 4. The appearance of the market quay development wouldn't matter because it has already been ruined by the "eyesore" that is Tesco's. 5. Quay Street would also need improvement to sustain extra development in market quay and that's not really possible. 	<p>The proposal to move the library and the theatre into a new building in Market Quay would provide a modern, multi-purpose venue that would be highly visible and easily accessible. It would also allow for easy access to West Street which these facilities are currently "cut-off" from after the Shopping Centre closes in the evening. There are currently no vacant units in the Mall large enough to house the library.</p> <p>Creating a new link through to Tesco from Market Quay would reduce the pedestrian traffic down Quay Street.</p>
		I hoped to see plans for a controlled crossing from Argos to the bus station.	The proximity to the pedestrianised area of West Street would make justifying a crossing in this location difficult.
		One of the three platforms could be adapted into a BRT pickup and drop-off point.	The cost of such a project would be a major issue as this would involve substantial engineering works. The BRT is likely to utilise the existing highway along the Avenue, with an improved bus stop interchange outside the station.
REF	Private	There should be no development in the Gosport – Stubbington area until the road	Hampshire County Council are responsible for

ID	Respondent	Comment	Proposed Council Response
9	individual	situation has been improved. The bus rapid transit system doesn't seem to have had any effect upon the very poor road system accessing Gosport.	the highway network and do have an ongoing programme of improvements, including proposals along Newgate Lane. The planned employment development at Daedalus to help provide local jobs and there is limited growth (less than 20 dwellings) planned at Stubbington. Housing and employment growth in Gosport will be planned by Gosport Borough Council.
REF 10	Private individual	All development will increase the traffic density in the centre of the town. Currently many roads have unacceptable congestion at times. The plan 2026 does not show how extra traffic can be accommodated without causing total gridlock.	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network. Development within walkable distance to Fareham Station gives people increased travel options other than the car.
REF 11	Private individual	This new development is not needed, taking up valuable and much needed farm land and ancient woodland. We should not be housing the surplus from the whole of Hampshire; the smaller development sites will house Fareham's waiting list. This town is becoming a mishmash of concrete and tarmac. We can't cope now with the traffic; 1500+ cars from this development will add to an already overcrowded road system. Before it is too late, have a referendum asking the people of Fareham a simple question: Do you want this development? The answer will be a resounding 'No'.	The principle for Welborne (New Community North of Fareham) was established in the Core Strategy (CS13). It does not form part of the Development Sites & Policies Plan. Further consultation on development at Welborne will be included in the Welborne Plan.
REF 12 REF 12 Cont	Private individual	The note about planning and development caused me to look at the plan for my area. > I see that the area behind my house, 2 Victoria Close, is marked as being an area common to the land at the back of numbers 3,4 and 5. > Some time ago, after this land was designated as a SINC, someone in Winchester said that, obviously, the land behind No.s 3,4,5 was gardens, which belonged to the individual properties The present plan still shows the four areas as one, presumably with the same planning definition. > Previously I had wanted to include the area behind my house, No.2, as an integral	This issue is noted. The SINC designation has been removed, however without knowing the ownership of the land the Council is unable to recommend whether the land is available for private gardens.

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.		part of my garden but was told I had to wait until the local plan was published. > Are these four areas now designated as gardens and can I now do what is necessary to make my part an integral part of my garden?	
REF 13	Foreman Homes	Three of the housing sites you identified are mine and as such I thought you would appreciate an update. a) New Park Garage - construction commenced last week, b) Northway/Southway - due to start on-site within the next 3-6 months, c) Monterey Drive - due to finish in a month or so as some are already sold.	Noted.
REF 14 REF 14 Cont .	Private individual	<p>I was not initially going to oppose to this huge development because of the promise made that this development would put an end to the continual exploitation of our green spaces, but I am going to object to this development now because of the boroughs continuing development of small spaces especially on green field sites in Portchester, I was most displeased to read of another green space at Portchester is to be turned over to please a developers greed, namely that in Station Road, I was of the opinion that when the proposed 7000+ housing blight to the north of Fareham that would put an end to the eating up of all our green spaces.</p> <p>But now we hear that one of the most beautiful of spaces, endowed with lovely trees that are at their most beautiful in the spring at the bottom of Station Road is going is going to be sacrificed for yet more houses.</p> <p>I don't have problem with brown field sites being utilised but this is place where I see a lot of old folks from the adjacent sheltered housing sit and watch the world go by, walk their dogs and other leisure pursuits, If five + houses are to be built on this site where are all the vehicles going to park, is there going to be another junction on this already busy roundabout, and what about access on that busy junction, It's bad enough with the continual parking for the adjacent workshop, its only going to get worse when that blight to the north is completed.</p> <p>The route from station road roundabout to the top of Portsdown hill is already a rat run, used to avoid other busy junctions in the area, it's only going to get worse when 7000+ homes with the attendant two cars per household starts to impact on local roads.</p> <p>Explain to me, why when the housing waiting list is 2000 are 7000+ homes needed, and why here so close to Fareham, if green belt is going to be used regardless, then the housing could go anywhere, there are other areas that are more suitable without</p>	<p>This site is no longer being allocated for housing in the DSP Plan due to concerns over viability and design.</p> <p>The principle for Welborne (New Community North of Fareham) was established in the Core Strategy (CS13). It does not form part of the</p>

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		<p>using good arable land that is proposed here, When I look at google earth there would seem to be better sites at Whiteley, it's not farmland, it has better motorway access, there are already houses, factories, roads already in place, a railway junction close by and a huge area north of the M27 with not a lot on it.</p> <p>Perhaps you could enlighten me why this development at Fareham has to be on farmland and not somewhere more suitable?</p>	<p>Development Sites & Policies Plan. Further consultation on development at Welborne will be included in the Welborne Plan.</p>
REF 15 REF 15 Cont .	Private individual	<p>The older buildings and streetscape in the <u>High Street</u> are visually very important and I would hope that demolition or redevelopment with new infill would be resisted in favour of refurbishment and sensitive adaptation of existing buildings.</p> <p>The proposal to redevelop the <u>library</u> is surprising and sounds very expensive, however if the cost of redevelopment does not fall on rate payers and the end result is an improved Library I would support that. I would not support redevelopment being used as an excuse to close the library.</p> <p>The <u>Town Hall</u> building is an absolute eyesore. I did not see any proposals for giving it a makeover. Given the effort being put into improving the town centre this could be a missed opportunity.</p> <p>5.46 <u>Osborn Road Multi Storey Car Park</u> - It seems incomprehensible that car park capacity in the centre is to be reduced when the resident population is to be increased and substantially and our experience is that the car park is heavily used and there are queues in Osborn Road at peak times.</p> <p>5.48 I agree that <u>Ferneham Hall</u> and exterior spaces adjacent are disjointed and visually a mess. Again, I would support redevelopment provided the cost of creating a new public entertainment facility does not fall on local rate payers. As a former resident of L.B. of Kingston, we suffered the financial impact of the Council's efforts to build a new Theatre which pushed council tax significantly higher.</p> <p>5.37 Any redevelopment should not be used as an excuse to close the <u>local museum</u>. It is a very valuable resource and I would like to see it enlarged.</p> <p><u>West Street</u> - It is good to see that a Community Church is based in this street and hopefully any plan would allow for this use to remain as part of the mix of uses.</p>	<p>There are no demolition/redevelopments planned for Fareham High Street. This is a conservation area that is home to a number of listed buildings, and will therefore be protected by the heritage policies in the Plan.</p> <p>The library plays an important role within the Town Centre and any proposal that would result in it being closed down would not be supported.</p> <p>Noted. There are no plans to "makeover" the Civic Offices.</p> <p>Studies show that the car park is rarely full and that there is also capacity in other car parks across the Town Centre. The queues in Osborn Road are often down to issues entering and exiting rather than the car park being full.</p> <p>There is no proposal to raise Council tax to pay for a new facility.</p> <p>The potential re-use of Westbury Manor is not linked to the redevelopment of Market Quay. The museum use is run by Hampshire County Council, and so any decision on its long term future will be by HCC.</p>

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		<p><u>Green space/amenity land/parks</u> - Green edges and small park spaces are a vital part of farehams character and I strongly support efforts to retain and expand such areas.</p> <p><u>General Comments:</u> <u>Paved area outside Shopping Centre:</u> This is rather characterless, bleak and windswept. There may be scope for building more very small shop units on the centre line of the old road (east-west) to create more sheltered/ characterful shopping. This would reduce space for the market and might result in relocation of the bandstand but could if sensitively designed, reintroduce a much needed sense of scale to the area.</p> <p><u>Height of new developments:</u> Please avoid high rise - The Town Hall is an unfortunate aberration and hopefully will not be used as a precedent. Fareham is a low-rise town!!</p>	<p>Noted.</p> <p>Noted. Alternative uses are being considered for these spaces, including the addition of a new café/restaurants with additional outdoor seating.</p> <p>Noted.</p>
REF 16	Private individual	<ol style="list-style-type: none"> 1. Very optimistic view of the term 'open space'. Many of these sites are not open to the general public and may only provide 'open views' to a limited number of people. 2. The term 'countryside' appears to have a fluid connotation in Fareham. Areas of Urban Development such as 'Ribbon development' along roads have been labelled as 'countryside' 3. Basically Fareham is a 'dormitory town' with no one dominant industry to provide consistent source of employment. The plan shows that employment within Fareham is a minor consideration, scattered through the Borough. 4. What is the projected growth of population in the next 20 years? Fareham expanded 1960-80 so the population structure should be relatively static and on-going. What provision is there for an aging population? 	<p>Noted. The sites designated as open space are not all publically accessible. However they are considered important in terms of ecology and openness of the settlements.</p> <p>The areas outside the development boundaries are now labelled as such, as opposed to countryside. Ribbon developments are not considered to be "urban settlements" in their own right and thus fall under the definition of land outside the urban area boundaries.</p> <p>Economic Development is a key issue in the plan. Spreading new jobs across the Borough will ensure accessibility for a wider population.</p> <p>The projected population growth is linked to the need for new housing. This growth in population is linked to people living longer and inward migration. The Plan consider the need</p>

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			for additional older persons housing, however there are no specific allocations over and above the wider housing allocations.
REF 17	Private individual	<p>1. Widening part of road will not give much improvement. Road needs to be widened all way to market roundabout. If you can get 3 lanes all the way then consider 2 lanes towards motorway in the morning (1 lane to Lee-on-Solent) then 2 lanes towards Lee-on-Solent in evening (1 lane towards motorway).</p> <p>2. NB This 3 lane system should also be considered for A32 to Gosport.</p> <p>3. NBB How about a one way system into Gosport down A32 and one way system out of Gosport exiting at Whiteley.</p>	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network.
REF 18	Mrs M Greaves Prospective UKIP Councillor	<p>In my opinion Fareham Council is squeezing too many buildings in a relatively small area around Fareham Station either side (I presume) of the railway -</p> <p>1. New homes. How many are you proposing to build on Station Site?</p> <p>2. Offices. Where will they fit in? if they are many stories high it will be an eyesore.</p> <p>3 & 4. Shops, cafes and restaurants. Not necessary for the simple reason that if you are going to build a <u>Hotel</u> somewhere on that site (not a large site in my view) you don't need all those cafes and restaurants. Maybe a few shops are ok.</p> <p>5. I agree that there should be a pedestrian/cycle link from the station.</p> <p>6. I hope the new cross roads/ roundabout will not be complicated - It took me a while to get used to new lane layout coming off M27 to Fareham.</p>	The Station site is a key regeneration site within the Town Centre given its position as a "gateway" to the rest of the Town. The exact mix and scale of uses to that could be located on site are still unknown, however, it is unlikely that the development will be higher than 3-4 stories and it is unlikely that there will be a substantial amount of new shops and cafes.
REF 19	Private individual	<p><u>Minor Point</u> I noticed that the parcel of land in Danes Road Portchester recently acquired by FBC for amenity purposes is not depicted on the maps as 'open space'.</p>	Noted.
REF 20	Private individual	Whole chapter needs detail.	Noted.
REF 21	Private individual	Land bordered by Carisbrooke Ave and Pembroke Crescent currently with several mature trees. Consideration for designation as open space.	Noted.
REF 22	Private individual	1. The area for the proposed solar panel site is marked on the map 'Settlement Boundaries & Maps' as a <u>Strategic Gap</u> - It cannot be both. Once the area is covered with solar panels it will be more brownfield than green field.	The site remains within a Strategic Gap following the "Fareham Borough Gap Review" study. Any application for development in this area must accord with the relevant Strategic

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22 Cont .		2. This land is also the only viable route for a much needed Stubbington bye-pass. Although money is not available to build a bye pass at present it is <u>very short sighted</u> not to earmark land for use in the future. Traffic problems will only get worse and councillors must think beyond the next few years.	Gap policy in the Core Strategy. Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. However, they have not indicated that they require any land in this area to be safeguarded in the DSP Plan. Therefore FBC is unable to resist development on highway grounds.
REF 23	Private individual	It would have been useful for someone from HCC Highways Planning to be in attendance. There are many questions on traffic planning and traffic flow that cannot be answered on what is on display.	Noted.
REF 24	Private individual	Much is written about use of retail premises and the need to be flexible between various categories of use. Also discussed is the appearance standard to be maintained when premises are in use. There is however no mention of the appearance of retail premises that are empty. Sect 5.19 mentions 'Dead frontage' and 12 month periods. I propose that empty premises do not have 12 months grace but are immediately required to be sorted out by landlords. No whitewashed windows or tatty appearance.	Noted. This issue is being considered. The Council is in contact with landlords of vacant units to encourage occupation as soon as possible, or to improve the frontage.
		No mention of Stubbington village centre and the need to reduce traffic! Burnt House Lane, the local 'Rat Run' for vehicles, has now suffered a major sewer collapse probably due to heavy traffic flow along roads not designed for it.	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. However, they have not indicated that they require any land in this area to be safeguarded in the DSP Plan.
REF 25	Private individual	Yes - let's build it - give the developer planning permission.	The acceptability of an individual planning application is not a consideration within the DSP Plan.
REF 26	Theatres Trust	Our Ref.: RF/4588 Development Sites and Policies Thank you for your email of 3 October consulting The Theatres Trust on Part 2 of the Local Plan, Development Sites and Policies. Chapter 5 Fareham Town Centre We are surprised that the evening economy is only mentioned once in para.5.48 as	Noted. The DSP Plan has a relatively open approach

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REF 26 Cont .		<p>we would have expected this topic to have its own policy to determine how the town is to retain its vitality after the shops have shut. We note Ferneham Hall is included as an element to the evening economy, but not the Ashcroft Arts Centre. We also note that use class D2 is mentioned within many policies for the town centre, but not sui generis uses such as theatre.</p> <p>Policy CF1 Community Facilities Thank you for including theatres and the arts in para.10.3 as examples of community facilities. We support the policy which will protect existing facilities and provide for new where required.</p> <p>The primary purpose of cultural facilities is to enlighten and entertain the public through the production, presentation, exhibition, advancement and preservation of art, music, theatre and dance. Support of culture is increasingly seen as an investment in an area's present and future quality of life. There is a growing awareness of the role that the arts and culture play in developing an educated workforce and, on the other hand, in attracting an educated workforce to a town. The infrastructure that is provided for communities' quality of life will become an increasingly important element in attracting new residents.</p> <p>The Theatres Trust is The National Advisory Public Body for Theatres, safeguarding theatre use or the potential for such use; we provide expert advice on integral new theatre design, heritage, property and planning. Established by The Theatres Trust Act 1976, we exist to 'promote the better protection of theatres'. The Trust delivers statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO), that requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.'</p> <p>We are also a consultee on Neighbourhood Development Orders and Community Right to Build Orders, and encourage local authorities, parish councils and local groups to consult the Trust on Local and Neighbourhood Development Plans.</p>	<p>to the opportunity areas within the Town Centre and is actively promoting a new multi-use venue on the Market Quay site which would include a replacement theatre. We do not feel there is a necessity for an "evening economy" policy as the guidance for the opportunity areas in the Town Centre should indicate a focus on new public spaces, new places to eat and drink and the new multi-use venue.</p> <p>Noted.</p>
REF 27	Private individual	<p>Remove T3 - Completed - Policy implemented. T4A 3051 North Curbridge - Check. Deficiency of open spaces - Cattisfield, Wallington and North Fareham Allotment.</p>	Noted.

ID	Respondent	Comment	Proposed Council Response
REF 28	Private individual	I am a resident of Bursledon in Eastleigh. At the moment the A27 experiences gridlock between Windhover roundabout and Bursledon Bridge at peak travel times. Eastleigh's local plan contains proposals for housing development in this area. Add to this the housing proposals at cold east, Locks Heath/Warsash and Whiteley. Add to this the massive Boorley Green proposal at Eastleigh and consider that all the traffic arising from these developments will be using the M27 junction 8 which is already at saturation point at peak travel times. What transport assessment has been made to judge the impact of all this on the quality of life of Bursledon residents?	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. HCC are involved in the DSP Plan process at all stages and have made no indication that the level of development proposed would have unacceptable harm on the road network.
REF 29	Private individual	As a resident of Bursledon I find the traffic on the Windover R/Abt and the A27 impossible at the moment. With nearly 1000 homes predicted in Warsash, 1,400 in Botley and 3000 in Whiteley the strain on the infrastructure will be unable to cope. I feel that a much larger overview needs to be taken as within a five mile radius of Warsash there will be 10,000 new homes and no infrastructure to support this!!!	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. HCC are involved in the DSP Plan process at all stages and have made no indication that the level of development proposed would have unacceptable harm on the road network.
REF 30	Private individual	Almost complete lack of anything about the Hinton/Limes hotel site in Catisfield. I have a feeling other things are taking priority for Fareham Council Planning Dept over the development of the 'Catisfield Carbuncle' i.e. the Hinton 'Hotel'/Limes Hotel site. It has been a disgrace for the 42 years I have lived opposite it.	This site now has planning permission for residential development. It will remain an allocation in the DSP Plan until complete.
REF 31	Private individual	Unfortunately there appears to be no provision on the plan for upgrading of A27 between Delme Fareham Creek roundabout and Station roundabout. There is congestion on this road at off peak times as well as during peak hours. At peak times traffic backs up as far as motorway junction. The new bus lane unfortunately does not help. The Tesco roundabout lights coming from the West are badly sequenced allowing only 2-3 vehicles through at a time. This means traffic backs up and buses coming from Quay Street cannot turn right on to the roundabout to access the bus station (3 sequences of lights to get through the other day midday).	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. One specific area of future improvements will be the Station roundabout, although details are not yet available.
REF 32	Private individual	From the roundabout A27 at Segensworth towards Junction 9 M27 there are only 2 lanes which then go into 3 lanes M27 West, Whiteley, M27 east. During rush hour times the Whiteley and M27 East are blocked back to the A27 roundabout the lane M27 West is empty because there is no access to it from the roundabout. Only	Noted. Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements.

ID	Respondent	Comment	Proposed Council Response
REF 32		<p>about 4' at a distance of 15 feet needs to be cut back to clear the problem. I know this is up to HCC, please pass on.</p>	
REF 33	Private individual	<p>Having attended one of the Locks Heath Development Plan briefing/presentations in the Community Centre, I am now aware that there appears to be a linked, yet separate planning issue. This seems to be confined to the A27, south of the Holiday Inn roundabout. (see attached Email and plan boundary).</p> <p>My property appears to be 'slap bang' in the middle of the subject area. Despite talking to numerous planning officials in the various council and highways departments I cannot find out any detail of related plans. I acknowledge that this must be a very early stage of the related planning process. However on the assumption that the November deadline for public comment applying to the Locks Heath plan applies equally to the A27 development, there is little time for such comment e.g. how many of the landowners adjacent to the subject A27 know anything about the proposals.</p> <p>Obviously I am concerned that any proposal to widen the road will have some impact on my property as there appears to be no way that widening could be achieved within the existing boundary of Privately owned land. There is presumably also a risk of planning 'blight' which could affect the sale of my property.</p> <p>I apologise for my lack of knowledge of the planning process and thanks in advance for any related information that you can provide.</p>	<p>Noted. Having consulted Hampshire County Council, who are responsible for the highways in the Borough, they are no longer looking to have this particular piece of land safeguarded for highways improvements. Therefore the designation will be removed.</p>
REF 34	HCC Archaeologist	<p>I understand that you are currently consulting on Fareham Borough Councils Development Sites and Policy Plan. In my capacity as archaeological advisor to the Borough Council I have a few comments I wish to make which I hope will be helpful. I believe that my suggestions would bring the plan in line with the NPPF and further strengthen what is basically a good Historic Environment Policy. I have submitted these comments via the general consultation with Hampshire County Council but wanted to pass them directly to you as I believe they are minor changes which could easily be addressed.</p> <p>Chapter 12: Heritage and Conservation Paragraph 12.2: For completeness I would suggest that the following bullet point is</p>	<p>Points noted. The Heritage and Conservation section and policy have been amended to take account of these comments.</p>

ID	Respondent	Comment	Proposed Council Response
REF 34 Cont		<p>added: 'the council will pursue a positive strategy for the conservation and enjoyment of the historic environment to include:</p> <ul style="list-style-type: none"> • Support of the deposition of historic environment information and its dissemination through the Historic Environment Record (Hampshire Archaeology and Historic Buildings Record) <p>The HER is referred to in the NPPF (169) as the publically accessible evidence base that planning authorities have a duty to maintain or have access to. Inclusion of this bullet would also provide support for the public dissemination of the results of archaeological investigation that are obtained through archaeological conditions imposed on planning consents, consistent with the NPPF (141, 126, 131).</p> <p><u>Nationally significant but undesignated heritage assets:</u> The Borough Council should consider identifying sites that are nationally significant but not designated. These should be included in the discussion as in planning terms these should be treated the same as designated assets (see NPPF 139, 132, 133, 134). The County Archaeologist can provide a list of current sites in this category and the Historic Environment Record should be referred to as the up to date source for these.</p> <p><u>'Sites of archaeological importance':</u></p> <p>Paragraph 12.11: The section on the sites of archaeological importance is good, although for consistency I would advise that the term 'Archaeological interest' be used rather than archaeological importance. This is the term used in the NPPF, and in the preceding PPS,5 and is defined in the glossary of the NPPF. The definition should also been reiterated in the glossary of the Local Plan.</p> <p>Also the policy needs to address the potential for previously unidentified archaeological heritage assets; this is particularly relevant for large developments. It is suggested that a sentence on this be added under the 'sites of archaeological interest/importance' heading. The Borough Council may wish to consider something along the lines of the following: ' A considerable proportion of archaeological sites are not currently known about. New sites are discovered all the time, most commonly in areas where there has been little previous archaeological investigation. Defining areas where previously unknown archaeological sites are likely to be present</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>requires specialist knowledge and developers should contact the County Archaeological Officer to establish.....'</p> <p><u>HN1 Historic Environment</u> There needs to be reference to undesignated but nationally significant Heritage Assets for consistency with the NPPF e.g. 'HN1-Historic Environment - In considering the impact of proposals that affect the borough's heritage assets; i) give great weight to the conservation of designated and nationally significant heritage assets' (addition in bold/italics).</p> <p>Finally, I would suggest that the Borough Council consider the addition of a statement along the lines of : '<i>treat favourably proposals with a positive strategy for engaging the community with the results of archaeological investigation.</i>' This would encourage greater engagement of the local community with the results of archaeological investigations undertaken as a result of development mitigation and would be consistent with the spirit of the NPPF which encourages public presentation of results.</p> <p>General comments</p> <p>Paragraphs 9.1 – 9.3: The National Planning Policy Framework (NPPF) 126 encourages that Heritage should influence design. Similarly development can have an environmental impact on heritage. Accordingly, it is suggested that in addition to the reference in the supporting text to the Core Strategy: Design Policy CS17 and the emerging Design SPD, that a cross reference also be included to the heritage Policy: HN1 (and indeed other relevant 'environmental' policies) in the current consultation document to reinforce that this and other issues are also important design and environmental impact considerations. As the Core Strategy Policy CS17 indicates that development will be designed to 'respond positively to and be respectful of the key characteristics of the area, including heritage assets....' It is expected that the Design SPD will also address heritage issues.</p> <p>If I can be of any further assistance or if you would like to discuss any of these points further please do not hesitate to contact me. I am aware of the tight deadlines involved and can usually respond within a few days if necessary.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 35	PUSH	<p>It is acknowledged that this part 2 local plan is set in the context of the Fareham Core Strategy which was adopted before the publication of the revised South Hampshire Strategy. This local plan part however does recognise that there is revised housing figure for Fareham</p> <p>ED1 - Support This policy which seeks to retain existing employment sites in employment use accords with the South Hampshire Strategy policy 8 that existing and allocated employment sites should be safeguarded for employment uses.</p> <p>ED2 - Support This policy allocates sites for employment development it is support policy the overall provision of additional floorspace as advocated in SHS policy 6. It is broadly in line South Hampshire Strategy policy 7 although it is not specific about types of employment.</p> <p>ED3 - Support This policy seeks to retain existing boatyards for marine employment unless no longer viable. South Hampshire Strategy policy 7 seeks to allocate sites for marine employment so policy ED3 would be in line with the aims of this policy.</p>	Noted.
REF 35 Cont		<p>TC1,TC2,TC3 - Support These policies all relate to the retail offer and creating a sense of place in Fareham Town Centre. There are broadly in line with the aims of South Hampshire Strategy policy 10 (Retailing) and South Hampshire Strategy policy 5 (Quality places).</p> <p>DS4 - Support This policy seeks to prevent out of town shopping unless its meets certain tests. This in line with the National Planning Framework (NPPF) and South Hampshire Strategy policy 10.</p> <p>T1 - Support This policy is safeguards the line of the proposed BRT extension and is consistent with paragraph 8.6 in the South Hampshire Strategy.</p> <p>T2 - Support This policy safeguards the land required to allow for improvements on Newgate Lane</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>which will improve access to the Solent Enterprise Zone in line with paragraph 8.5 in the South Hampshire Strategy.</p> <p>H1 - Support The policy acknowledges the revised housing target set the SHS policy 1. Table 2 set outs how the revised housing allocation will be delivered.</p> <p>H3 - Support This policy enables the development of older peoples housing and is in line with South Hampshire Strategy policy 12.</p>	
REF 36	Private Individuals	Blackbrook Grove, 23 The Avenue, Fareham PO14, 1NT. Recommended for housing.	The site is within a designated Historic Park and Garden and is therefore not considered suitable as a housing allocation due to the potential harmful impact upon the Listed Building.
REF 37 Cont .	David Lander Consultancy on behalf of Devine Homes	<p>This letter constitutes a response to the Development Sites & Policies consultation on behalf of Devine Homes Plc, with particular reference to land under their control west of Botley Road at Beacon Bottom. Previous submissions in respect of this land have been made on behalf of both Gracilis Limited (former owners of the majority of the land and a company associated with Devine Homes Plc) and by Quantum Group Limited. We refer in particular in this context to the companies' responses to the Call for Sites consultation in December 2011.</p> <p>This letter is accompanied by three attachments as explained in the text which follows.</p> <p><u>The Proposal</u> The land in question is identified on the attached plan (11002/01) and extends to an area of 3.52 hectares. It is bordered to the east by properties fronting Botley Road, including the new care home being developed by Quantum Group, to the south by the rear boundaries of properties in Beacon Bottom, and to the north by the railway line – with the M27 immediately beyond.</p> <p>Devine Homes Plc seek the allocation of this land for retirement housing to meet the specialist needs of this increasingly important sector in the Borough's population. The scheme would comprise a specific allocation pursuant to Policy H3 of the Development Sites and Policies DPD. The basis for the proposal is set out below.</p>	<p>The need for older persons housing is noted within the DSP Plan. However, the overall figure for population growth, which (in part) forms the basis for the housing target does take account of growth in those people living longer. It is, therefore, not considered appropriate to allocate additional sites specifically for elderly persons accommodation over and above the general housing allocations needed to meet the housing target.</p> <p>The Council is confident that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites in the outside the urban area boundaries.</p>

ID	Respondent	Comment	Proposed Council Response
REF 37 Cont .		<p>Policy Context</p> <p>National planning policy seeks to ensure the provision of adequate housing to meet the needs of all groups within the community. The following references from the National Planning Policy Framework (NPPF) indicate the Government's priorities in this regard:</p> <p><i>"Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth". (para. 17)</i></p> <p><i>"To boost significantly the supply of housing, Local Planning Authorities should use their evidence-base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area....." (para. 47)</i></p> <p><i>"To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive of mixed communities, Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)." (para. 50) [our underlining]</i></p> <p>Chapter 8 of the Development Sites & Policies DPD at para. 8.21 onwards demonstrates the significance of the increasing need for 'older people's housing'. Whilst this is a national trend, para. 8.21 notes that growth in Hampshire is projected to be higher than in any other County in the South East of England, and within Hampshire it is more pronounced in the southern districts including Fareham.</p> <p>Para. 8.22 notes that according to the 2011 Census 27% of the Borough's population is aged 60 or over and that between 2011 and 2026 population growth in the 65 + cohorts will be the highest in percentage terms of all age groups.</p> <p>Para. 8.25 states that the Council recognizes the importance of planning for those who wish to move into specialist types of older people's accommodation such as sheltered accommodation, retirement communities and extra care housing.</p> <p>Plainly older people comprise an important and growing component of the housing</p>	

ID	Respondent	Comment	Proposed Council Response
REF 37 Cont .		<p>needs of the Borough. In accordance with national policy set out in the NPPF it is therefore incumbent on the Council to ensure appropriate provision to meet this, both in terms of older people in general and those who seek specialist accommodation in particular.</p> <p><u>Responding to the Need</u></p> <p>Policy H3 of the DPD adopts a permissive approach to the provision of new housing for older people subject to compliance with four criteria:</p> <ol style="list-style-type: none"> 1. easy access to community facilities, services and frequent public transport, or provision of on-site services; 2. well integrated with the wider neighbourhood; 3. sufficient car parking for visitors and residents; 4. (where appropriate) a choice of tenures. <p>However, the DPD contains no specific proposals to accommodate the need with no site allocations specifically for 'older people's housing'. This is in marked contrast to conventional market housing for which a number of specific allocations are proposed.</p> <p>Devine Homes Plc submits that having regard to the identified need for specialist older people's housing and the obligation on the Borough Council to meet identified needs in full, specific consideration should be given to this matter in the DPD.</p> <p>The needs of older people when entering specialist accommodation are likely to change as they age and become more dependent on support services. The concept of a continuing care retirement community reflects this by offering a range of residential accommodation and services. For such communities to function effectively they inevitably require a large floorspace and, to provide a satisfactory environment for the residents, a substantial site area.</p> <p>It is not realistic to rely on the currently identified components of projected housing supply to deliver any such opportunities. Dealing with each of the three categories of supply in turn the position is as follows:</p> <ul style="list-style-type: none"> • <i>sites with planning permission</i> are already committed for the provision of conventional housing; • <i>allocations</i> will no doubt provide scope for a mix of housing types, but this is 	

ID	Respondent	Comment	Proposed Council Response
REF 37 Cont .		<p>unlikely to include any significant element of specialist retirement accommodation, given the absence of any reference to this in the site proformas included in Chapter 8 of the DPD. Moreover provision could only be made at the expense of conventional housing capacity on which the DPD relies to meet the Borough housing target;</p> <ul style="list-style-type: none"> • <i>windfall sites</i> are by their nature small sites which are unlikely to be capable of accommodating the form of development necessary to provide specialist retirement housing. <p><u>Land at Beacon Bottom</u></p> <p>Quantum Group are currently developing a care home fronting Botley Road at Park Gate. To the rear of this is the land in the freehold ownership by Devine Homes Plc as described above. Quantum Group have identified the potential of this land as an appropriate location to provide a continuing care retirement community and previously submitted a planning application (subsequently withdrawn) for the development (Fareham B.C. Ref. P/11/0615/OA).</p> <p>Accompanying this submission are two attachments which support the proposed allocation of this site:</p> <ul style="list-style-type: none"> • Quantum Group's response to the LDF call for sites (December 2011); • Quantum Group's Consultation leaflet relating to the previous planning application. <p>he first of these attachments identifies the potential of the site to accommodate a specialist retirement community having regard to the site's size and characteristics, proximity to local services and public transport. The second document contains relevant demographic information and an indication of the nature of development proposed, demonstrating how it will respond to the identified needs.</p> <p>he site at Beacon Bottom lies outside the currently defined settlement boundary. The adopted Core Strategy allows for an amendment of settlement boundaries to accommodate development needs, in the context of a sequential approach. Part 3.6 of the Development Sites & Policies DPD states that the Council has determined that there is sufficient land available to meet the Core Strategy's development requirements without amending settlement boundaries. As noted however, no explicit provision is proposed for 'older people's housing', notwithstanding the clear evidence</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>of the need for such accommodation and policy support at national level. In these circumstances it is submitted that it would be appropriate to amend the settlement boundary at Beacon Bottom to accommodate the land identified on the plan which is suitable for this purpose.</p> <p>Because of its containment its addition to the settlement boundary would have no wider implications for the protection of the countryside or the application of countryside policies. At present the site comprises overgrown scrub land of little environmental or amenity value. Moreover Devine Homes Plc control additional land to the west (indicated by blue line on the plan) where there is the opportunity to create additional public open space to the benefit of the local community.</p> <p>Devine Homes Plc would welcome the opportunity to discuss appropriate development principles with the Council reflecting the broad concept of development set out in the enclosed Quantum Group leaflet.</p> <p>I trust that careful consideration will be given by the Borough Council to this proposal. If you have any queries or require further information please do not hesitate to contact me.</p>	
REF 38 REF 38 Cont	Friends of Fareham Museum	<p>The Friends wish to express great concern over the proposal in this document to move the museum and T.I.C. from Westbury Manor to another location however "appropriate". The reasons given for this plan are that the building is "not intensively used", and that there are alternatives which would make better use of its assets, and would benefit the building. Suggestions put forward are a restaurant, cafe, or bar, or "a unique venue or an exhibition centre". There are already a good number of the former in the Town Centre, and the latter use would hardly be more "intensive" than the museum.</p> <p>Westbury Manor, a handsome Grade II listed building, is ideally situated to serve as a museum which reflects the rich history of the Borough. Internally with its fine exhibition gallery and other good-sized, well-lit rooms, externally standing as it does in a prominent and eye catching position in West street, with its elegant railings and a sweeping driveway fronting it, it serves its present purpose well.</p> <p>It is also within easy reach of the bus station and train route, and vehicles conveying school parties or disabled visitors can use the road outside as a drop-off point. Above all this is one of Fareham's landmark buildings, in a key location, and as a</p>	The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage Assets Policy on account of its location and its Listed Building status.

ID	Respondent	Comment	Proposed Council Response
		<p>museum it is freely accessible to the public in a way not possible with other uses.</p> <p>For these reasons we will hope that Westbury Manor can continue to grace Fareham as its museum.</p>	
REF 39 REF 39 Cont .	Environment Agency	<p>Thank you for consulting the Environment Agency on your Development Sites and Policies. Having reviewed the information submitted we have the following comments.</p> <p><u>General Comments</u></p> <p>Flood Risk</p> <p>As highlighted in your adopted Core strategy (paragraph 5.13 & 5.14) the majority of the district lies within areas of low risk of flooding, while your Strategic Flood Risk Assessment (SFRA) acknowledges the impact of climate change on the district. A number of the proposed sites within this Plan, currently lie within flood risk areas and will do for the lifetime of the development (100 years for residential).</p> <p>Paragraph 5.14 of your Core Strategy highlights the need to consider the sequential test as set out in the National Planning Policy Framework (NPPF) to ensure development is located in the lowest areas of flood risk.</p> <p>The proposed site allocations (such as site 83 & 1002) that lie within a flood risk area now and in the future due to climate change will be required to pass the sequential test. Justification is required to show why these flood risk areas are being put forward for development. We would expect evidence to be provided to demonstrate that the sequential test has been undertaken. This information could be included within a background document.</p> <p>If it can be demonstrated that the proposed allocations pass the sequential/exception test then you need to be satisfied that the site is deliverable in terms of flood risk prior to any allocation.</p> <p>We are happy to help with this work and recommend this information accompanies the next stage of this document.</p> <p>Groundwater</p> <p>We acknowledge that some of the proposed allocations require work to ensure they do not cause a risk to groundwater due to pervious uses on the site. The NPPF</p>	<p>The housing allocations at Windmill Grove, corner of Station Rd/A27, Seaeye House and the Bus Depot, Gosport Road have all been removed from the housing supply to reflect, amongst other issues, the flood risk.</p>

ID	Respondent	Comment	Proposed Council Response
REF 39		<p>requires that sites are suitable for new uses (in relation to pollution arising from previous uses.</p> <p>In line with the NPPF a desk study and preliminary risk assessment should be produced prior for any brownfield site requiring planning permission.</p> <p>Water Framework Directive We would advise that the Water Framework Directive (WFD) requires all water bodies to reach 'good' status by 2015, the proposed allocations should assist in reaching this objective where possible.</p> <p>It may be useful to refer to the River Basin Management Plan (2009) which is available on our website. If you require any further information on this please do not hesitate contact me.</p> <p>Site Specific Comments Comments on the below sites are not withstanding the application of the sequential test. Site ID: 83 Windmill Grove, Portchester</p> <p>The most recent version of the Environment Agency's Flood Map shows the area within the red line boundary as lying within Flood Zones 1 and 2, and therefore defined as having a low to medium probability of flooding at the present day. An area of Flood Zone 3 abuts the site boundary to the south. The 'Key Planning & Design Issues' E2 section should be updated to reflect this information. This section should also identify the risk of flooding across the 100 year development lifetime to 2115 using Mapset 1E of the Partnership for Urban South Hampshire Strategic Flood Risk Assessment (PUSH SFRA).</p> <p>Mapset 1E identifies that the site and its access route (Windmill Grove) will lie entirely within Flood Zone 3 (and therefore have a high probability of flooding) by the year 2055. The Eastern Solent Coastal Partnership is currently developing a Flood & Coastal Erosion Risk Management Strategy which is in its early stages and has not progressed sufficiently to conclude that any defence improvements will be made in this location.</p>	

ID	Respondent	Comment	Proposed Council Response
Cont .		<p>The raising of land referred to within the 'Information Required' section may reduce the risk of flooding on the site itself, however Fareham Borough Council (FBC) should note that ground (or floor levels) will need to be raised by at least 1 metre to prevent internal flooding of dwellings. FBC will need to take this into account within the context of other planning considerations, such as the relationship with neighbouring dwellings, to ensure that there are no obvious reasons why this would not be viable.</p> <p>It is also important to note that safe access and egress would also be inundated to a depth hazardous to pedestrians by the year 2055 and would similarly need to be raised by approximately 1 metre to provide the safe access route required by the NPPF. This is often not a viable solution in existing urbanised areas due to the constraints of neighbouring properties and highway connections. Prior to allocating this site for residential development, FBC should be reasonably confident that either:</p> <ul style="list-style-type: none"> – Safe access for pedestrians during a flood event can be secured by raising levels or providing other appropriate flood risk management infrastructure, including a clear funding source and responsibility for undertaking this work (this would be the Environment Agency's preferred method of managing risk) <p>OR, if this is not viable,</p> <ul style="list-style-type: none"> – In the absence of safe access and egress, and with agreement from the emergency planning team and the emergency services, that the principle of reliance on a flood response plan is appropriate. This plan should identify a place of refuge (and include measures to ensure that people can remain safe within this refuge for the duration of the flood event which could be several hours) and/or arrangements for prior evacuation. This location, due to its proximity to the coastline, could be inundated rapidly once the tide rises above the level of the land. It is not within our remit to advise on issues relating to emergency planning/response. Our role is limited to the issuing of flood warnings. <p>If FBC is not reasonably satisfied that the measures needed to deliver safe development are deliverable or appropriate, then the site should not be allocated for residential development.</p> <p>If the FBC does decide to allocate the site, any developer will be required to undertake a full Flood Risk Assessment to inform an appropriate combination of flood</p>	

ID	Respondent	Comment	Proposed Council Response
REF 39 Cont .		<p>risk management measures, to be agreed by FBC.</p> <p>Site ID: 1002 Land at the corner of Station Road and A27 in Portchester</p> <p>The 'Key Planning & Design Issues' section should be amended to include information from Mapset 1E of the PUSH SFRA. This indicates that the site and its access route will be located entirely within Flood Zone 3 (and therefore have a high probability of flooding) by the year 2115 i.e. within the lifetime of any residential development.</p> <p>The draft Portchester to Emsworth Flood & Coastal Erosion Risk Management Strategy recommends that defences are upgraded from Portchester Castle to Paulsgrove. This is, however, subject to funding availability. Currently the recommended improvements would only be eligible for part-government funding. Unless a significant contribution can be found, this government money will be spent upon higher priority flood defence schemes nationally. In addition, regardless of funding availability, the recommended improvements would be for the primary benefit of the existing community and may not, on their own, be sufficient to satisfy the requirements of the NPPF in relation to flood risk management.</p> <p>There are, therefore, significant uncertainties relating to the provision of strategic flood defences in this area.</p> <p>The raising of land could reduce the risk of flooding on the site itself, however the site should not be allocated before Fareham Borough Council (FBC) are reasonably confident that raising of the site (or finished floor levels) by approximately half a metre (confirmation of this figure is necessary by a site specific Flood Risk Assessment) is viable, and would be compatible with other planning considerations including the relationship with adjacent dwellings. If not, internal flooding of dwellings would be likely to occur.</p> <p>It is also important to note that safe access and egress would also be inundated to a depth hazardous to pedestrians and would similarly need to be raised by approximately 1 metre to provide the safe access route required by the NPPF. This is often not a viable solution in existing urbanised areas due to the constraints of neighbouring properties and highway connections. Prior to allocating this site for</p>	

ID	Respondent	Comment	Proposed Council Response
REF 39 Cont .		<p>residential development, FBC should be reasonably confident that either:</p> <ul style="list-style-type: none"> – Safe access for pedestrians during a flood event can be secured by raising levels or providing other appropriate flood risk management infrastructure, including a clear funding source and responsibility for undertaking this work (this would be the Environment Agency's preferred method of managing risk) <p>OR, if this is not viable,</p> <ul style="list-style-type: none"> – In the absence of safe access and egress FBC, with agreement from their emergency planning team and the emergency services, are satisfied with the principle of reliance on a flood response plan. This plan should identify a place of refuge (and include measures to ensure that people can remain safe within this refuge for the duration of the flood event which could be several hours) and/or arrangements for prior evacuation. It is not within our remit to advise on issues relating to emergency planning/response. Our role is limited to the issuing of flood warnings. <p>If FBC is not reasonably satisfied that the measures needed to deliver safe development are deliverable or appropriate, then the site should not be allocated for residential development.</p> <p>If the FBC does decide to allocate the site, any developer will be required to undertake a full Flood Risk Assessment to inform an appropriate combination of flood risk management measures, to be agreed by FBC.</p> <p>Site ID: 1072 Land to the rear of 347-411 Hunts Pond Road</p> <p>We are supportive of the requirement to locate development in Flood Zone 1.</p> <p>We are aware that there may be localised drainage issues in and/or around the site which should be addressed through the necessary drainage strategy.</p> <p>Site ID: 1215 Seaeye House, Lower Quay The Environment Agency's Flood Map shows the area within the red line boundary as</p>	<p>Noted. The majority of this site already has planning permission for residential development. For the remaining elements, drainage issues will be considered as part of the planning application.</p>

ID	Respondent	Comment	Proposed Council Response
REF 39 Cont .		<p>lying within Flood Zone 1, defined as having a low probability of flooding at the present day.</p> <p>However, Mapset 1E identifies that the site and its access route will lie entirely within Flood Zone 3 (and therefore have a high probability of flooding) within the 100 year lifetime associated with residential buildings. The Eastern Solent Coastal Partnership is currently developing a Flood & Coastal Erosion Risk Management Strategy which is in its early stages and has not progressed sufficiently at this time to conclude that any defence improvements will be made in this location.</p> <p>If residential uses are proposed for the ground floor, finished floor levels will need to be set approximately one metre above ground level to minimise the risk of internal flooding. Unless Fareham Borough Council (FBC) are reasonably confident that this would be compatible with other planning considerations, including the relationship with adjacent dwellings, commercial uses must be located at ground floor level. Depending upon the exact ground levels at and around the site, a risk of internal flooding to commercial uses may remain, but would be more feasible to mitigate through flood resilient and resistant construction.</p> <p>It is also important to note that safe access and egress would also be inundated to a depth hazardous to pedestrians within the lifetime of a residential development, and would similarly need to be raised by approximately 1 metre to provide the safe access route required by the NPPF. This is often not a viable solution in existing urbanised areas due to the constraints of neighbouring properties and highway connections. Prior to allocating this site for residential development, FBC should be reasonably confident that either:</p> <ul style="list-style-type: none"> – Safe access for pedestrians during a flood event can be secured by raising levels or providing other appropriate flood risk management infrastructure, including a clear funding source and responsibility for undertaking this work (this would be the Environment Agency's preferred method of managing risk) <p>OR, if this is not viable or likely at this time, that</p> <ul style="list-style-type: none"> – In the absence of safe access and egress FBC, with agreement from their emergency planning team and the emergency services, are satisfied with the principle of reliance on a flood response plan. This plan should identify a place of 	

ID	Respondent	Comment	Proposed Council Response
REF 39 Cont .		<p>refuge (and include measures to ensure that people can remain safe within this refuge for the duration of the flood event which could be several hours) and/or arrangements for prior evacuation. This location, due to its proximity to the coastline, could be inundated rapidly once the tide rises above the level of the land. It is not within our remit to advise on issues relating to emergency planning/response. Our role is limited to the issuing of flood warnings.</p> <p>If FBC is not reasonably satisfied that the measures needed to deliver safe development are deliverable or appropriate, then the site should not be allocated for residential development.</p> <p>If the FBC does decide to allocate the site, any developer will be required to undertake a full Flood Risk Assessment to inform an appropriate combination of flood risk management measures, to be agreed by FBC.</p> <p>Site ID: 40 Bus Depot, Gosport Road</p> <p>We are supportive of the text included within the key planning & design issues.</p> <p>I hope that you find the above comments useful. If you require any further information regarding the above we would be happy to meet to discuss this response.</p>	
REF 40	Axis 2 Limited	<p>We act on behalf of Axis 2, freehold owners of land within the Fareham Station East development area. The land is currently leased to the Hampshire Fire Service Authority and comprises approximately 0.2 ha as shown edged red on the attached land registry plan. Access to the site is available from Station approach off the main West Street roundabout.</p> <p>The site has been actively promoted by Axis 2 Ltd as a potential development opportunity at various times in the past and the Company supports the development allocation. The purpose in submitting these further comments is to confirm the landownership details of the Fire Station site and that Axis 2 remains a committed party to its development either as a standalone development or as part of a comprehensive development including adjoining land. Axis 2 wants to make clear that it regards the master planning of the site to be an important and immediate task and requests being included in the master planning process of its land within the</p>	<p>Noted.</p> <p>Noted.</p>

ID	Respondent	Comment	Proposed Council Response
REF 40 Cont .		<p>development allocation. As policy TC13 perceives the comprehensive development of land in different ownerships, land assembly should commence at earliest opportunity. If the site owners of adjoining land are reluctant to do this voluntarily, then the Council should be prepared to consider site acquisition using its compulsory purchase powers as this may be the only way to ensure the development comes forward in a timely fashion.</p> <p>Axis 2 notes that in respect of plan making, the new National Planning Policy Framework (NPPF) (paragraph 173) requires plans to be viable and deliverable. It states that sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.</p> <p>In these regards Axis 2 understands the need for the Hants Fire Authority to be encouraged to relocate to an alternative site that meets its operational requirements and the company would welcome a joint initiative with Fareham Borough to secure this relocation at the earliest opportunity.</p> <p>The other points which follow from the NPPF guidance concerns policy TC13 and its lower case policy text in paragraphs 5.71-5.74. Policy TC13 states that the redevelopment of the Fareham Station East land will be in accordance with an agreed master plan to provide for an indicative mix of uses. However there is no guidance on the timing of the development or likely overall amount and/or mix of development in the policy save for references in the lower case text that suggest s development could be carried out on a comprehensive basis in a phased programme (5.71); that development could be provided in mixed use blocks of up to 3 stories with commercial ground floor uses and residential and offices over, leisure uses or hotel (5.72); an amount of residential is suggested in a range of 20-40 units depending on the office demand (5.73); and provision also has to be made for a bus/rail/cycle/pedestrian interchange.</p> <p>For the reasons set out in the NPPF, Axis 2 is concerned that TC13 and its lower</p>	<p>The Council is happy to work with landowners and the Hampshire Fire Authority where appropriate. However, reference to the need to relocate the fire station is now included in the Policy for the area.</p> <p>Given that the site is complicated by land ownership issues and existing use values it is difficult to put an estimated time frame on the delivery of the site.</p> <p>At this stage the Plan we are not planning to</p>

ID	Respondent	Comment	Proposed Council Response
REF 40 Cont .		<p>case wording needs to allow for more flexibility in the amount of development as setting arbitrary limits now may impact the overall viability of the allocation and prejudice its deliverability. Accordingly, there should be no limits on the size of any single ground floor commercial unit of no more than 150sqm in the policy or limits on the total amount of housing especially as the range specified in the policy is less than the 85 dwelling capacity identified in the 2010 SHLAA. The urban design guidelines setting likely storey heights will also impact on the potential amount of development to be provided in the building envelope and impact on its overall viability.</p> <p>In our view therefore, all these details should be deleted from TC13 and the explanatory text and instead left for consideration in the master plan. The policy could be strengthened by stating that the proposed mix of uses and overall amount of development will be subject to overall viability considerations and will be informed by an agreed master plan as well as residential amenity considerations.</p> <p>Apart from the amount of development, the costs of other policy requirements to be applied to the development will also directly impact on viability and deliverability. These could include additional CIL charges or other infrastructure contributions. However as advised in the NPPF, such charges must not threaten viability. Accordingly therefore, we believe TC 13 should also be amended to make reference to the potential waiver of CIL or other charges where these would be justified in terms of the overall viability and deliverability of the site specific redevelopment allocation.</p>	<p>be prescriptive on the mix and quantum of uses that can be accommodated on the site. The references to limits on unit sizes have been removed to reflect this.</p> <p>Noted. The text has been amended to allow a greater degree of flexibility and to leave more detailed work to a later stage.</p> <p>It is not considered appropriate to allow for individual sites to include reference to a "CIL waiver". Viability remains a key issue and will be taken into account on a case by case basis at the planning application stage.</p>
REF 41 Cont	Southern Planning Practice on behalf of Frobisher Developments Ltd	<p>1.0 Object to policy ED1 as the policy fails to comply with the National Planning Policy Framework (NPPF). This states: That planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to the market signals and the relative need for different land uses to support sustainable local communities.</p> <p>1.2 The policy as written clearly checks alternative uses to employment, contrary to the NPPF advice. Therefore the policy should be amended by changing the last paragraph of the policy.</p>	Policy ED1 has been amended to take account of this issue. It now allows for existing employment sites to change to alternative uses as long as alternative economic development uses have been considered in the first instance, it can be demonstrated that the existing use is no longer appropriate and there are details showing marketing over a 12 month period.

ID	Respondent	Comment	Proposed Council Response
REF 41 Cont		<p>Proposed Changes to Text</p> <p>1.3 Where there is no reasonable prospect of the site or area being used for B1, B2 or B8 uses, or that other alternative employment uses are not viable or suitable, then change of use for an alternative non employment use will be permitted provided that: “A marketing exercise for a period of 12 months concludes there is no realistic demand for the site; or An appropriate level of alternative employment provision already exists, having regard to market conditions, or can be provided in an acceptable alternative location.”</p>	
		<p>1.1 Policy ED2 is supported; in particular the allocation of Little Park Farm, Park Gate for employment uses but the wording of the text and policy should be modified to comply with the National Planning Policy Framework and for purposes of consistency.</p> <p>Principle</p> <p>1.2 The site was identified as suitable for employment use in the Fareham Borough Local Plan policy paragraphs 9.33 and 9.37. Further examination of the site was made in Fareham Borough Council’s Employment Land Review paragraphs 5.7 and 5.9 dated October 2010 and subsequently in the Core Strategy, Paragraph 5.20. Since then further representations were submitted by the principal land owner, Frobisher Developments Ltd, which are attached for ease of reference. Since the submission of those representations further land acquisition has taken place to the point where the site is available for development subject to resolving the issue of access; on-going talks about the access have taken place with Network Rail which are in an advanced stage and agreement is near. Work is expected to begin in 2014 with the applications for the improvements to the access and for the redevelopment of the site being submitted in 2013. The site is therefore suitable, available and deliverable.</p> <p>Proposed Changes</p> <p>Text changes for Paragraph 4.12</p> <p>1.2.1 Access is no longer a major constraint and is resolvable immediately as provided for in the supportive documents and therefore should not be an impediment to traffic volumes. Therefore it is inappropriate to rule out development on the basis that it would lead to significant traffic flows particularly as the text later refers to the need for the Council being satisfied that the access arrangements are suitable. Furthermore, it is inconsistent with the text of the policy which refers only to ensuring that there is adequate</p>	Noted. Reference to "significant levels of traffic" is removed.

ID	Respondent	Comment	Proposed Council Response
REF 41 Cont .		<p>access to meet the needs of the development being proposed; there is no reference to significant traffic flows. Existing Text</p> <p>1.2.2 The site has potential for economic development uses [that do not generate significant levels of traffic], although the existing access will need to be improved for heavy goods vehicles to safely access the site. Development will only be permitted if the Council is satisfied that the access arrangements are suitable for the uses proposed.</p> <p><u>Proposed Changes to Text</u></p> <p>1.2.3 The site has potential for economic development, although the existing access will need to be improved for heavy goods vehicles to safely access the site. Development will only be permitted if the Council is satisfied that the access arrangements are suitable for the uses proposed.</p> <p>1.3.0 The National Planning Policy Framework (NPPF) states:- That planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to the market signals and the relative need for different land uses to support sustainable local communities.</p> <p>1.3.1 The policy seeks to resist the loss of floorspace from employment uses; it runs counter to the above advice. The policy should thus be amended to comply with the NPPF.</p> <p>Existing Text</p> <p>1.3.2 Changes of use or redevelopment within the employment area which would result in a loss of floorspace for economic development uses will be resisted.</p> <p><u>Proposed Changes to Text</u></p> <p>1.3.3 Changes of use or redevelopment within the employment area which would result in a loss of floorspace for economic development uses will be resisted unless it can be demonstrated that that the site is no longer suitable or viable for employment uses and that there is evidence of active marketing for twelve months.</p> <p><u>Proposed Changes to Map</u></p>	<p>Policy and supporting text wording changed to reflect a more flexible approach. Policy ED1 has been amended to take account of this issue. It now allows for existing employment sites to change to alternative uses as long as alternative economic development uses have been considered in the first instance, it can be demonstrated that the existing use is no longer appropriate and there are details showing marketing over a 12 month period.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>1.4.1 The allocation boundary does not appear to correspond to the district boundary – see maps below. Bearing in mind that Winchester District Local Plan Review, Policy S15 and the Joint Core Strategy Submission of Winchester District, Paragraph 6.17 carry forward the allocation of the site within Winchester Council's district, the need to make efficient use land in accordance with the Framework and the need to be consistent, the boundary should be amended to correspond to Fareham's district boundary.</p>	
REF 42 REF 42 Cont .	Drivers Jonas Deloitte on behalf of the BST Group	<p>Fareham Borough Council Draft Local Plan Part 2 – Development Sites & Policies Representations issued on behalf of The BST Group</p> <p>Site Description The former Pink's Timber yard (Electric Sawmills), Wickham Road, Fareham, P017 5BT (referred to as the Sawmills site) is owned by The BST Group.</p> <p>The Sawmills site has been in use for industrial purposes for in excess of 50 years and has a site area of 2.27 hectares.</p> <p>Existing buildings are concentrated in the eastern and central part of the site, which comprises approximately 1.1 hectares of the total site area.</p> <p>The western part of the site, as shown on Plan 1, is occupied by 2,217sq.m of open storage, B2 and B8 uses. The eastern part of the site is occupied by single storey buildings in B2 use and extensive areas of hard standing. The total footprint of buildings is circa. 4,434 sq.m.</p> <p>The site has a 130m frontage along Wickham Road, and also an extensive frontage to Forest Road which forms the eastern boundary. To the south of the site are 11 houses and one retail unit, five of which share a common boundary with the site. To the north is a Southern Water pumping station; to the west and east is agricultural land.</p> <p>The site is Previously Developed Land, currently located in countryside to the south of Wickham and outside of any landscape designations.</p> <p>Relationship to the NCNF</p>	This site has been passed to the Welborne team for consideration as part of the Welborne Plan.

ID	Respondent	Comment	Proposed Council Response
REF 42 Cont .		<p>Core Strategy Policy CS13 promotes the development of the NCNF, located within close proximity of the Sawmills site. The location of NCNF and the Sawmills site is identified in Plan 2, appended to this document.</p> <p>The exact boundary of NCNF will be determined by the Area Action Plan which is being prepared by Fareham Borough Council.</p> <p>Policy CS13 and the promotion of the NCNF is a material consideration to be taken into account in considering the changing context of the Sawmills site during the life of the plan.</p> <p>The development of the NCNF will have a considerable influence on the suitability of the Sawmills site as a location for new housing, with an element of commercial space for the following reasons:</p> <ul style="list-style-type: none"> • The northern boundary of the NCNF is likely to be within 50m of the Sawmills site and the whole NCNF will be located within 2km from this site. • The presence of 5,000 to 6,500 homes and 90,000 sq.m of employment floorspace within 2-3km of the Sawmills site that there needs to be a re-evaluation of its suitability as a location for employment uses, and its suitability for residential development. • The Sawmills site will have very good access to the full range of district and local centre facilities that will be provided in the NCNF, making it a much more suitable and sustainable location. • There will also be a significant increase in the accessibility of the site by public transport, and pedestrian and cycle linkages both to the NCNF, and also to Fareham. • The NCNF will provide a full range of employment floorspace in small and large units including B2 and B8. There will be no need to retain the Sawmills site for employment uses as better located employment floorspace will be provided in the NCNF with first class public transport access by BRT. <p>With the NCNF located on its doorstep, the Sawmills site will no longer be detached from the built-up area and would become a truly sustainable location for residential development.</p> <p>The Opportunity The Sawmills site presents an opportunity to provide new housing close to the NCNF on Previously Developed Land, in a location that will become well related and connected to the NCNF by bus, foot and cycle, whilst retaining very convenient</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>access to the existing amenities of Wickham.</p> <p>The redevelopment of the site from employment to residential use would provide an opportunity to improve the visual impact of the site on the open countryside to the east and to create a high quality development with a strong landscaped frontage to Wycombe Road and Forest Road.</p> <p>The future of the site for employment uses is put in doubt by the employment floorspace to be provided in the New Community. There will be more than enough employment space in the NCNF, and there could be no argument that the site should be retained in employment use.</p> <p>Proposed Policy Approach</p> <p>There are two options for the Sawmills site which the BST Group would wish to explore with Fareham Borough Council:</p> <ul style="list-style-type: none"> • The site could be allocated in the Local Plan Part 2 - Development Sites and Policies. It would make a small but valuable contribution to housing supply, making good use of Previously Developed Land in a location which will be increasingly sustainable as the NCNF is constructed. It would reduce reliance on windfall sites. It would also improve the character and appearance of the approach to Wycombe and have some beneficial impact on the character of the countryside to the east. • The alternative, and the BST Group's preferred approach, would be to include the Sawmill site within the NCNF boundary so that it can be brought forward as a small independent phase and be guided by the design guidelines and sustainability approach that will be adopted within the NCNF. <p>We would welcome discussion on this proposal.</p>	
REF 43	Wildlife Trust	<p>In response to the consultation on the Farnham Local Plan Part 2 we have the following comments to make.</p> <p>Whilst it is pleasing to see a number of your policies contain provisions to protect the natural environment the Trust has concerns that these policies and therefore Local Plan Part 2 do not go far enough in ensuring that the environment will be protected.</p> <p>Site allocations</p> <p>The Trust notes that both the accompanying Habitat Regulations Assessment and Sustainability appraisal have identified that a number of the sites will have a likely</p>	Noted.

ID	Respondent	Comment	Proposed Council Response
REF 43 Cont .		<p>significant adverse impacts on the natural environment without mitigation measures being considered. The Trust is concerned that avoidance of impacts should always be the first consideration rather than just mitigation.</p> <p>The Trust notes that the Habitats Regulation Assessment has identified that there are a number of allocated sites within 500 metres of sites of high importance to Waders and Brent Geese. The Trust is concerned that these sites have been included as Site allocations even though it is recognised though the Waders and Brent geese strategy that buildings and homes within 500m can be detrimental to areas of high importance to Brent geese.</p> <p>It is noted that your policies for these, include a requirement for developments to provide an ecological survey and assessment and any potential ecological impacts appropriately mitigated. The Trust would question whether avoidance of impacts to the Brent geese could be realistically achieved on an individual site by site base assessment and believe that these sites should be assessed in the strategic context through the Local Plan Part 2.</p> <p>If avoidance of impact cannot be established and it is considered that these developments are required in the overriding public interest, then compensatory suitable alternative habitats for the Brent geese would be required. This can only effectively be dealt with at a Strategic level. The Local plan part 2 provides the platform for assessing this.</p> <p>The Trust would wish therefore to see avoidance measures for the Brent Geese sites assessed at this strategic level and realistic avoidance measures proposed within Local Plan Part 2. The Trust would be happy to work with the Farnham Borough Council on these matters.</p> <p>Open spaces The Wildlife Trust is disappointed and concerned that you have not included a specific policy for the creation of New Green space within Local Plan Part 2.</p> <p>It is recognised that the Local Plan Part 1 Core strategy has Policies CS4 and CS21 however the Trust would wish to see a further policy within this Local plan part 2 to ensure that new green spaces sites can come forward.</p>	<p>The majority of sites within 500m of the SPA have now been removed from the DSP Plan. The remaining site (335-357 Gosport Road) is considered to have a minimal impact given the scale of the development proposed and distance to the SPA.</p> <p>A policy has been added to highlight two new open space allocations being made by the Council, as well as explanation of where shortfalls of open space in the Borough are, and how these are going to be met. However, it must be noted that for specific “built up” parts of the Borough it is true to say that options for</p>

ID	Respondent	Comment	Proposed Council Response
REF 43 Cont		<p>It is disappointing to see in your text in section 10.28 that you believe that “ there is limited opportunity to <i>address the shortfalls in Farnham</i>”. We believe that these shortfalls do need addressing together with additional space provided for the new development.</p> <p>We believe that new open spaces are required not only to address any recreation impacts arising from the impacts to the European designated sites but also to address recreational impacts on other Nature conservation sites. In addition it is well recognised that open spaces add to the quality of life for local residents.</p> <p>It is noted that whilst recognising this shortfall in open space you are basing this on the standard set out in the Core Strategy policy CS21 which set the standard as 1.5ha per 1000 population for parks and amenity open space. However you clearly recognise the that you are failing in meeting the standards set within the south east Green infrastructure of 2ha and 500 ha sites.(section 10.27) but offer no solutions to addressing either standards.</p> <p>Whilst it is recognised that table 3 sets out sites for the creation of new open space. We note that 5 of the 8 sites proposed are under 1 ha in size. The Trust is concerned that this is not a sufficient size to be viable as areas where people can have an enjoyable recreation experience</p> <p>As you are aware there are various studies that have been undertaken that explore what visitors require and these have identified that sites need to be of a sufficient size to accommodate a 2.5 km walk and of a sufficient quality to attract people to use them. No new sites have been identified that would enable this.</p> <p>The Trust would wish to see included within the Local Plan Part 2 a policy setting out standards and quality required for informal open space together with a realistic proposals for the creation of new informal open space of sufficient size and quality.</p> <p>It is also noted that the Local plan part 2 mentions in 10.27 the work on the PUSH Green infrastructure implementation plan however you do not mention Fareham’s contributions to this. The Trust would wish to see Fareham’s contributions to the Strategic South Hampshire clearly set out in addition to the setting out how the open space needs for the local residents will be met.</p>	<p>addressing shortfalls are limited.</p> <p>A Green Infrastructure Strategy is being prepared to set out how this will be achieved.</p>

ID	Respondent	Comment	Proposed Council Response
REF 43 Cont .		<p>The Trust would be happy to discuss with you the options for the provision of informal open space in Fareham. We would also be pleased to discuss with you in more detail the Trusts own vision in relation to the Forest of Bere.</p> <p>Habitat Regulations Assessment. These comments are provided in addition to those given concerning the site allocations.</p> <p>It is noted that in section 5.24 of the HRA it states that :</p> <p><i>"The Development Sites and Policies Plan will be in general conformity with the Core Strategy, 5.2.4and does not propose development levels over and above that set out by the higher-tier plan. As such it does not add further to the potential atmospheric pollution and disturbance from recreation impacts already considered as part of the Core Strategy HRA. The uncertainty regarding potential impacts to European sites from atmospheric pollution and disturbance is therefore viewed as being managed through the Core Strategy and its HRA, while also being applicable to certain site allocations (residential sites in relation to disturbance, and residential, employment and retail sites in relation to atmospheric pollution)."</i></p> <p>The Trust is concerned that these are currently not being managed through the Core Strategy .</p> <p>With regards to Air Pollution with the exception of the new rapid bus transport system, there is no evidence to show that other changes have been made to ensure that air pollution is being managed.</p> <p>With regards to Disturbance from recreation the Trust recognises that the Solent Disturbance Mitigation work is ongoing and that Fareham Borough Council is fully engaged with this process. We are however concerned that housing has continued to be developed without appropriate mitigation measures in place.</p> <p>It is therefore extremely concerning that Local Plan Part 2 proposes to continue to develop without appropriate mitigation in place. The Trust would wish to see as a minimum, new open spaces created as part of this Local plan part 2 that will not only provide some mitigation but also as open spaces for health and wellbeing of the local community. This issue is discussed under our comments on open spaces.</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>Policy BD1 Protected species and Habitats</p> <p>The Trust is pleased to see and welcomes the inclusion of this policy. We note that this policy will protect <i>“protected and targeted species as set out in the UK and Hampshire BAP”</i>. Whilst fully supporting this the Trust would question why Fareham’s own BAP has not been mentioned within this policy and the accompanying text. The Trust would therefore wish to see this policy also include protection of the habitats and species set out in Fareham’s own BAP</p> <p>In conclusion</p> <p>The National planning Policy Framework states in section 152 that Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.</p> <p>We believe that whilst the Local Plan Part 2 does contain policies to protect the natural environment in its current format it will lead to adverse impacts upon the natural environment. We have set out our reasoning for these above and the changes that we wish to see to address these. We would be happy to meet with yourselves to discuss them further should you wish.</p>	
REF 44	Barton Willmore on behalf of the Co-op	<p>1. We act on behalf of the Co-operative Group (“the Co-op”) and have been instructed to submit representations and objections to the consultation on the Draft Fareham Local Plan 2: Development Sites and Policies (“the Local Plan”).</p> <p>2. In preparing this representation, we have reviewed the Fareham Retail Study (October 2012) and preceding Retail and Centres Planning Study Update (June 2009). We have also had regard to the draft Locks Heath Masterplan.</p> <p>3. Our comments are made in accordance with the guidance set out in the National Planning Policy Framework (NPPF), in particular the soundness tests contained at NPPF paragraph 182.</p> <p>4. The following objections are set against this background, the findings of the Retail Study and guidance set out in the NPPF.</p>	
REF 44			

ID	Respondent	Comment	Proposed Council Response
REF 44 Cont .		<p>goods floorspace capacity of just 401 sq.m net sales in Locks Heath District Centre up to 2027. Additional capacity is generated by increasing the assumed market share ratio. This increases capacity to 2,308 sq.m net sales by 2027 (from 401 sq.m). We do not believe such an increase (from 29% from Zone 6 to 60%) is a realistic or achievable aspiration given the District Centre designation and clear expectation set out in Core Strategy Policy CS3 that the existing centre hierarchy should be maintained. The evidence base justifying the new foodstore in the Masterplan on the basis of this 'increased' capacity is seriously flawed and unsustainable.</p> <p>9. Moreover, using these substantially increased market share 'aspirations' for Locks Heath District Centre, there is no detailed assessment of the wider impacts on other higher order Centres (namely Fareham Town Centre) and the impact on vitality and viability that could arise from convenience goods expenditure being redistributed to Locks Heath from a number of zones to the west of Fareham. This uncertainty highlights a serious flaw with the proposals to extend Locks Heath District Centre on the basis of the Retail Study findings, and is contrary to the NPPF (paragraph 27).</p> <p>10. The NPPF (paragraph 158) is clear that Local Plans should be based on adequate, up-to-date and relevant evidence, which we feel is not the case in this instance as the Retail Study (October 2012) is only published in part and its findings are not considered to be relevant in so far as it applies unrealistic and unjustified market share assumptions.</p> <p>11. The NPPF (paragraph 23, sixth bullet) states that sites should be allocated to meet the scale and type of development needed in Town Centres (this applies also to District Centres). Given there is only very limited capacity identified in the Council's current Retail Study, using more appropriate market share assumptions, the allocation to extend Locks Heath District Centre to deliver a new food store is not justified and seriously flawed. Applying a more moderate increase in market share, whether justified or not, would not generate sufficient additional capacity for a new food store as proposed as part of the expansion of Locks Heath District Centre.</p> <p>12. Without setting a scale of floorspace for the foodstore in the Local Plan, and instead relying on the Masterplan, we consider that this approach is unsound in under the terms of the NPPF. The capacity at Locks Heath District Centre for a new foodstore needs to be tested at Examination, specifically the assumptions of the Retail Study, the impact on other higher order Centres (Fareham Town Centre in</p>	<p>does not, however, specify how this will be achieved. References to "an agreed masterplan" have now been removed to reflect the fact that there are a wide variety of approaches that may be suitable to achieve the growth necessary at Locks Heath Centre.</p> <p>It is important for sustainability reasons that the Locks Heath Centre improves in order to "claw back" trade that is currently being lost to other stores/centres outside of the Borough. A 60% market share is considered to be a realistic target given the lack of major competition within the Locks Heath area.</p> <p>The impact of increasing the floorspace at Locks Heath is not considered to be a major concern for Fareham Town Centre, given that Fareham already has a Tesco, Sainsbury's and Aldi within close proximity of the Centre. Any market share increases in the areas to the West of Fareham are likely to be marginal and so unlikely to adversely influence the vitality and viability of the Town Centre as a whole.</p> <p>The Council has and will continue to produce evidence documents to support policies within the Plan up until the submission of the document. The previous retail study was published in 2009 and was considered to be out of date to support the Plan.</p> <p>The scale of floorspace considered appropriate as part of any expansion has been added into the Policy. This puts a clear steer on what the Council considers to be justified in Locks Heath Centre. This is in line with the evidence</p>

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REF 44 Cont .		<p>particular) and conformity with emerging Policy DS1 and adopted Policy CS3. On this basis, the proposed allocation for additional convenience goods floorspace is not justified nor is it consistent with the NPPF. It cannot therefore be considered 'sound'.</p> <p>13. The Co-op has progressed alternative proposals for the extension of the District Centre, and these are shown in our representations made to the Locks Heath Masterplan consultation (dated 22nd November).</p> <p>Proposed Changes to the Proposals Map Inset Map 2.</p> <p>14. The Co-op objects to the proposed Locks Heath District Centre boundary, representing an approximate fourfold increase to that defined in the March 2000 Local Plan. This proposed District Centre expansion includes predominately woodland or open space which is not considered appropriate when considered against the NPPF's definition (at Annex 2) of a Town Centre (which as a definition applies also to District Centres). This is as follows:</p> <p><i>"Town Centre: Area defined on the local planning authority's proposals map, including the primary shopping area and areas predominantly occupied by main town centre uses..."</i></p> <p>15. The Co-op therefore objects to Inset Map 2 as currently drafted due to the proposed 'over extension' of the District Centre boundary. Without this being revised, the plan is not consistent with the NPPF and cannot be considered 'sound'.</p> <p>Recommended Changes to the Draft Fareham Local Plan 2</p> <p>16. For the reasons set out above, the Co-op objects to the Draft Local Plan in its current form. The following changes are therefore proposed in order to make the Plan 'sound' for future draft versions and subsequent Examination:</p> <ul style="list-style-type: none"> • Amend Draft Policy DS2 to specifically reference that proposed retail uses will be in accordance with the NPPF (paragraph 23) and in conformity with Core Strategy Policy CS3 in so far as being of an appropriate scale to maintain the defined network and hierarchy of centres. • Remove reference in draft Policy DS2 to the expansion of Locks Heath District 	<p>from GVA.</p> <p>The expansion of the District Centre boundary is necessary to not only allow for potential expansion, but also to include uses associated with the Centre such as Community Facilities and parking. A similar approach has been applied at Portchester District Centre. The boundary has been amended so it no longer includes the open space or woodland.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>Centre being in line with an agreed Masterplan. The Masterplan (as emerging) is not considered to be in conformity with the Local Plan (comprising the Core Strategy and emerging Local Plan 2), fails to consider the impact on other, higher order Centres and is based on a flawed evidence base. The policy is therefore neither justified nor consistent with the NPPF (paragraphs 27 and 158).</p> <ul style="list-style-type: none"> Amend Inset Map 2 to define a revised Locks Heath District Centre Boundary for consistency with the definition in the NPPF (Annex 2). 	
REF 45	Portchester Planning Consultancy on behalf of Arlington Business Parks Partnership	<p><u>POLICY ED1: EXISTING EMPLOYMENT SITES AND AREAS – OBJECTION:</u></p> <p>It is considered that Policy ED1 of the DS&P document is not sufficiently flexible to accommodate circumstances where an employment site has been vacant and undeveloped for an extensive period of time and has not attracted a purchaser or developer.</p> <p>If it has been demonstrated that a site has been vacant for a reasonable period of time (i.e. normally accepted as being 12-18 months), alternative uses which make the best use of the land should be encouraged, whether or not they provide a comparable quality or quantity of jobs.</p> <p>As drafted the policy requires that where a site has been vacant for a reasonable period of time, redevelopment for an alternative use must provide employment opportunities of a similar quality and quantity to those which previously existed. In the case of a B1 site/building complying with this policy requirement would, in practice, be impossible. This is because the ‘density’ of occupation in a B1 development per person is far higher than any other employment use. The commonly used English Partnerships floorspace standards indicate approximately 25 sq m per person for B1 use; this cannot be matched by other employment uses, in particular B2 and B8. Therefore, it would not be possible to comply with this part of the policy and therefore, no alternative uses could ever be granted under the provisions of the Policy as it is currently worded.</p> <p>Making the best use of land within urban areas is a well-established and sound planning objective and its delivery should not be thwarted by an overly rigid policy such as draft Policy ED1.</p> <p>The National Planning Policy Framework (NPPF) seeks to achieve a dynamic, flexible and responsive planning system which can deliver a genuinely prosperous</p>	Policy and supporting text wording changed to reflect a more flexible approach. Policy ED1 has been amended to take account of this issue. It now allows for existing employment sites to change to alternative uses as long as alternative economic development uses have been considered in the first instance, it can be demonstrated that the existing use is no longer appropriate and there are details showing marketing over a 12 month period.
REF 45			

ID	Respondent	Comment	Proposed Council Response
Cont .		<p>economy coupled to the provision of the new homes, open spaces and other services and facilities communities need to thrive. It is therefore essential that Local Plans should meet objectively assessed needs, with sufficient flexibility to be able to adapt to rapid change.</p> <p>It is relevant to have regard, in particular, to paragraph 22 of the NPPF which states:</p> <p><i>'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be frequently reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of 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 local communities.'</i></p> <p>As drafted, DS&P Policy ED1 fails to achieve this and should be reworded to allow appropriate alternative uses to be permitted on employment sites which have been shown to be vacant and no longer suitable or viable for employment purposes, such as the ABPP Solent 2 site.</p> <p>Such circumstances were anticipated by paragraph 4.11 of the adopted Core Strategy which states:</p> <p><i>'It is recognised that there will be cases in some existing employment sites where it can be proven that the permitted employment uses are no longer appropriate, and in these cases other uses will be considered.'</i></p> <p>Draft Policy ED1 should be revised to take account of the need for greater flexibility, thus ensuring compliance with the adopted Core Strategy and NPPF.</p>	
		<p><u>POLICY ED2: NEW EMPLOYMENT DEVELOPMENT – OBJECTION: RE-DESIGNATION OF THE SOLENT 2 EMPLOYMENT SITE FOR HOUSING & OPEN SPACE:</u></p> <p>Policy CS1 of the adopted Core Strategy (2011) sets out a minimum employment floorspace target of an additional 41,000 sq m (excluding the SDA). Of this total, 10,000 sq m of B1 development will form part of mixed use schemes in Fareham town centre. In addition, the Daedalus Airfield Strategic Development Allocation will</p>	<p>The South Hampshire Strategy, developed by PUSH, has increased the employment target for the Borough from 41,000sq.m (as set out in the Core Strategy) to 100,000sq.m. This</p>

ID	Respondent	Comment	Proposed Council Response								
REF 45 Cont .		<p>accommodate a minimum of 10,000 sq m and up to 33,000 sq m of net additional general or light industrial or warehousing floorspace.</p> <p>Table 1 of the Development Sites & Policies document (DS&P) apportions the floorspace as:</p> <table border="1" data-bbox="461 384 1205 448"> <thead> <tr> <th>Total Requirement</th> <th>Class B1</th> <th>Class B2</th> <th>Class B8</th> </tr> </thead> <tbody> <tr> <td>41,000 sq m</td> <td>23,000sqm</td> <td>6,000 sq m</td> <td>12,000 sq m.</td> </tr> </tbody> </table> <p>Paragraph 4.9 of the DS&P document explains that because of completions since the start of the plan period (i.e. 2006) the residual target for B1 floorspace is now 14,054 sq m. It is relevant to note that Policy CS1 of the adopted Core Strategy requires the inclusion of 10,000 sq m of B1 floorspace as part of mixed use scheme in Fareham Town Centre. As little mixed use development incorporating B1 has taken place in the Town Centre since 2006 it is assumed that the majority of the 10,000 sq m remains to be provided. This leaves only 4,054 sq m of B1 floorspace to be provided throughout the rest of the Borough (excluding the SDA).</p> <p>As the residual B1 figure has been calculated having regard to completions, it follows that any existing commitments – such as the Solent 2 site have not yet been accounted for in the figures. The Solent 2 (part) ABPP site has planning permission for the erection of a total of 23,526 sq m of B1 floorspace. Subtracting just this one site from the residual B1 requirement of 14,054 sq m would result in an over-provision of 19,472 sq m (i.e. taking the Town Centre into account). This is without taking into account other commitments and planning permissions, plus potential B1 floorspace from sites such as Daedalus, and elsewhere in the Borough.</p> <p>In commenting on this over-supply, adopted Core Strategy paragraph 4.9 explains that: <i>‘The table shows that Fareham has the potential to far exceed its apportioned targets through a combination of existing commitments and other sites identified as having the potential to yield employment floorspace.’</i></p> <p>The Table attached to Core Strategy paragraph 4.9 indicates a B1 supply of 50,727 sq m compared to the residual target of just 14,054 sq m, resulting in an over-provision of 36,673 sq m – i.e. over 260%.</p> <p>Paragraph 3.32 of the Fareham Borough Council Employment Land Review (October</p>	Total Requirement	Class B1	Class B2	Class B8	41,000 sq m	23,000sqm	6,000 sq m	12,000 sq m.	<p>increase was supported (recommended a figure of 100,100sq.m) by further evidence undertaken by the Council from Wessex Economics.</p> <p>This statement in the Core Strategy is no longer relevant as it has been superseded by new evidence.</p>
Total Requirement	Class B1	Class B2	Class B8								
41,000 sq m	23,000sqm	6,000 sq m	12,000 sq m.								

ID	Respondent	Comment	Proposed Council Response																
REF 45 Cont .		<p>2010) (ELR) states that according to the Economic Development Forum, Fareham has 28,934 sq m of vacant B1 floorspace.</p> <p>The ELR, in considering Stage 3: 'Identifying a New Portfolio of Sites', indicates in Table 18 permitted floorspace gains of 19,481 sq m for B1. However, it should be noted that this figure is factually incorrect because 7,547 sq m of the development with planning permission at Solent 2 has been wrongly placed in the B2/B8 column. All of the 23,526 sq m permitted at Solent 2 is B1. This results in the corrected Table 18 the Class B1 column total being 27,028 sq m.</p> <p>Further, it is relevant to note that Stage 3 of the ELR then proceeds to identify in Table 19 a List of new 'Potential Sites'. Whilst the Table does not set out floorspace figures expected to be provided by these additional sites it can be assumed that these 15 new sites would contribute significantly to the over-supply of B1 floorspace in Fareham.</p> <p>For example, Stage 3 of the ELR identifies potential for additional B1 development at:</p> <ul style="list-style-type: none"> • a mixed development including 6,000 sq m of B1 floorspace at the Fareham Station area; • a further 1,000 sq m of B1 uses as part of the Market Quay Car Park redevelopment; • 2,500 sq m of B1 floorspace as part of the Civic & Cultural Quarter redevelopment; • 620 sq m of B1 floorspace as part of the Maytree Road redevelopment; and • 8,000 sq m of B1 floorspace at Hangers East at Daedalus Airfield. <p>These sites total:</p> <table data-bbox="461 1002 896 1066"> <tr> <td>Without Daedalus</td> <td>10,120 sq m</td> </tr> <tr> <td>Including Daedalus</td> <td>18,120 sq m</td> </tr> </table> <p>Taking these 2 sources of B1 floorspace into account it can be seen that:</p> <table data-bbox="461 1123 1164 1347"> <tr> <td>• Existing permitted schemes of (including Solent 2)</td> <td>27,028 sq m</td> </tr> <tr> <td>• Town Centre based potential new sites of</td> <td>10,120 sq m</td> </tr> <tr> <td>A Total of</td> <td>37,148 sq m</td> </tr> <tr> <td>Set against the residual requirement of</td> <td>14,054 sq m</td> </tr> <tr> <td>Resulting in a surplus of (without Daedalus)</td> <td>23,094 sq m</td> </tr> <tr> <td>Resulting in a surplus (including Daedalus)</td> <td>31,094 sq m</td> </tr> </table>	Without Daedalus	10,120 sq m	Including Daedalus	18,120 sq m	• Existing permitted schemes of (including Solent 2)	27,028 sq m	• Town Centre based potential new sites of	10,120 sq m	A Total of	37,148 sq m	Set against the residual requirement of	14,054 sq m	Resulting in a surplus of (without Daedalus)	23,094 sq m	Resulting in a surplus (including Daedalus)	31,094 sq m	
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ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>plus other non-Town Centre potential sites set out in Table 19.</p> <p>Table 20 of the ELR 'New Portfolio of Sites' shows how the Borough's employment floorspace targets could be met and the extent of the oversupply:</p> <ul style="list-style-type: none"> • Total B1 supply of 43,180 sq m • Residual requirement of 14,054 sq m • Resulting in an over provision of 29,126 sq m • Percentage oversupply 207.5%. <p>However, it should also be noted that Table 20 of the ELR continues the error found in Table 18 – i.e. that 7,547 sq m of the Solent 2 B1 permission has been incorrectly attributed to the B2/B8 column.</p> <p>When this is corrected in Table 20 the total B1 supply increases to:</p> <ul style="list-style-type: none"> • Total B1 supply of 50,727 sq m • Residual requirement of 14,054 sq m • Resulting in an over provision of 36,673 sq m • Percentage oversupply 260%. <p>Effect of removing Solent Site from the supply calculation:</p> <ul style="list-style-type: none"> • Deduct Solent 2 site from supply - 23,526 sq m • Adjusted B1 supply 27,201 sqm • Residual requirement 14,054 sqm • Resulting in an over provision of 13,147 sq m • Percentage oversupply 93.5 % <p>Therefore, if the Solent 2 site was deducted from this there would still be an oversupply of 13,147 sq m which, equates to a 93.5% over provision. It is therefore plain that the re-designation of the Solent 2 site for housing and open space would have no adverse impact on the Council's ability to meet its employment land target during the plan period.</p> <p>Whilst it is not unreasonable for a Local Planning Authority to want to have an appropriate 'buffer' to take account of circumstances where not all identified employment sites come forward, an appropriate over-provision would be in the region of 10%. There can be no justification for an over provision of 260% in any circumstances. Even a 93.5% buffer is vastly excessive (i.e. even after deducting the</p>	<p>The evidence from the Wessex Economics study has identified that the Council can meet its overall requirement for employment floorspace. However, it does note that there is an undersupply of offices which is compensated for by an oversupply of industrial/warehouse floorspace.</p> <p>The Employment Study concludes that Solent 2 is a good location for employment and that there is a reasonable prospect of the site</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>Solent 2 site from the supply figure).</p> <p>Further, the question also has to be asked as to why the non-Town Centre potential employment sites have not been allocated in Policy ED2 of the DS&P document (i.e. with the exception of Little Park Farm). It is clear that if the Solent 2 site was deleted from Policy ED2 there are other potential allocations that could be brought forward from the ELR sites into the policy, if necessary. However, given the vast over provision of B1 employment floorspace even after the deduction of the Solent 2 site from the supply figure, the need for such further sites is not compelling and such sites could be allowed to come forward as they may – i.e. in the form of windfall sites.</p> <p>The 'conclusion' to the ELR acknowledges that Fareham will be able to exceed its employment floorspace target and that the over-provision is considered: 'to provide a 'great deal of flexibility, and ensures that the Borough will be able to exceed its targets even if certain potential sites yield less than expected, or fail to provide any floorspace at all.'</p> <p>It is therefore clear that Fareham has a vast over-supply of employment land, in particular B1, and that the ELR accepts that even if some sites do not provide any floorspace that the overall target will still be significantly exceeded.</p> <p>It is in this context that ABPP is promoting the re-designation of its Solent 2 site from employment to residential use. The re-designation of the site would have no adverse impact on the Council's ability to meet its residual B1 floorspace target for the plan period. Further, as has been previously demonstrated to the Council, despite the marketing of the Solent 2 site continuously since 1993 it has failed to find a purchaser or developer for B1 uses and is an area of land located within the built-up area which is un-used and under-used and could be better used for a mixed-use scheme comprising housing and open space.</p> <p>In this regard, it is considered that Policy ED1 of the DS&P document is not sufficiently flexible to accommodate circumstances where an employment site has laid vacant and undeveloped for an extensive period of time (i.e. in the case of Solent 2 over 17 years) and particularly when the Council demonstrates a vast oversupply of employment floorspace.</p> <p>Policy ED1 requires that where a site has been vacant for a reasonable period of time, redevelopment for an alternative use must provide employment opportunities of</p>	<p>coming forward in the Plan period. Given that the Solent 2 site makes up almost 65% of the overall supply of office floorspace during the plan period its importance cannot be underestimated.</p> <p>The Council believes that it is appropriate to seek similar job numbers in the first instance.</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>similar quality and quantity. In the case of a B1 site/building complying with this policy requirement would, in practice, be impossible. This is because the 'density' of occupation in a B1 development per person is far higher than any other employment use. The commonly used English Partnerships floorspace standards indicate approximately 25 sq m per person for B1 use; this cannot be matched by other employment uses, in particular B2 and B8. Therefore, it would not be possible to comply with this part of the policy and therefore, no alternative uses could ever be granted under the provisions of the Policy as it is currently worded.</p> <p>If it has been demonstrated that a site has been vacant for a reasonable period of time (i.e. normally accepted as being 12-18 months), alternative uses which make the best use of the land should be encouraged, whether or not they provide a similar quality and quantity of jobs. In the case of the Solent 2 site, the site has been continuously marketed for over 17 years,</p> <p>2.33 Making the best use of land within urban areas is a well-established and sound planning objective and its delivery should not be thwarted by an overly rigid policy such as draft Policy ED1.</p> <p>2.34 The National Planning Policy Framework (NPPF) seeks to achieve a dynamic, flexible and responsive planning system which can deliver a genuinely prosperous economy coupled to the provision of the new homes, open spaces and other services and facilities communities need to thrive. Flexibility is a 'key' component in achieving this objective. As drafted, DS&P Policy ED1 fails to achieve this and should be reworded to allow appropriate alternative uses to be permitted on employment sites which have been shown to be vacant and no longer suitable or viable for employment purposes, such as the ABPP Solent 2 site.</p> <p>It is relevant to have regard, in particular, to the guidance at paragraph 22 of the NPPF which states: <i>Planning policies should avoid the long term protection of sites allocated for</i></p>	<p>However, the policy allows for alternative economic uses, which may not provide similar job numbers, to be considered if the unit has been vacant for a reasonable period of time.</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be frequently reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of 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 local communities.</p> <p>2.36 Further, it is clear that such circumstances were anticipated by paragraph 4.11 of the adopted Core Strategy which states:</p> <p><i>'It is recognised that there will be cases in some existing employment sites where it can be proven that the permitted employment uses are no longer appropriate, and in these cases other uses will be considered.'</i></p> <p>2.37 See also ABPP's objection to draft Policy ED1.</p>	
		<p>ALLOCATED EMPLOYMENTS SITES - OBJECTION</p> <p>POLICY ED2: NEW EMPLOYMENT DEVELOPMENT OBJECTION: ALLOCATION OF THE SOLENT 2 SITE FOR EMPLOYMENT:</p> <p>The specific allocation of the ABPP Solent 2 land as a new employment site is objected to.</p> <p>The site was allocated for business park uses in the Fareham Borough Local Plan Review 2000 under the provisions of Policy E3. This was 'brought forward' from the earlier plans for the Whiteley development. Outline planning permission for the site was first granted in 1993 and was renewed regularly up to the approval of Reserved Matters in 2008. The planning permission was lawfully implemented in September 2010, and duly recorded.</p> <p>By definition the Solent 2 site cannot be categorised as an 'allocation' of land – i.e. a new site to come forward in the future, when it already has planning permission, and</p>	<p>The evidence from the Wessex Economics study has identified that the Council can meet its overall requirement for employment floorspace. However, it does note that there is an undersupply of offices which is compensated for by an oversupply of industrial/warehouse floorspace.</p> <p>The Employment Study concludes that Solent 2 is a good location for employment and that there is a reasonable prospect of the site coming forward in the Plan period. Given that the Solent 2 site makes up almost 65% of the overall supply of office floorspace during the plan period its importance cannot be underestimated.</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>has been implemented.</p> <p>The 'requirements' for the development of the Solent 2 site were set out in the original 1991 Development Brief, reiterated in the 2000 Local Plan and met in the outline planning application and subsequent approval of reserved matters and discharge of planning Conditions.</p> <p>The Council plainly cannot now seek to impose a new 'Brief' for the site in circumstances when planning permission has been granted; the development commenced and can be lawfully completed in accordance with the planning permission. As such any 'Brief' included in a policy such as ED2 would be incapable of being complied with, imposed or enforced.</p> <p>The allocation of the Solent 2 site in draft Policy ED2 should be deleted. The site should be included in draft Policy ED1 as an existing employment site.</p> <p>Further, the fourth paragraph of draft Policy ED2 should be deleted as it is inconsistent with paragraph 4.11 of the adopted Core Strategy and the guidance in the NPPF, which seeks to achieve a dynamic, flexible and responsive planning system which can deliver a genuinely prosperous economy coupled to the provision of the new homes, open spaces and other services and facilities communities need to thrive. Flexibility is a 'key' component in achieving this objective.</p> <p>The wording of paragraph 4.10 of the DS&P document is also objected to. This is because if the Solent 2 site (i.e. Site 124) is considered in the ELR to score highly in terms of its suitability for both B1 and B2/B8 due to its access, prominence and lack of constraints, the question has to be asked why then has it remained undeveloped for over 17 years despite being continuously marketed throughout this period by ABPP?</p> <p>Similarly, the finding that the site is prominent is disputed. The site is tucked away at the end of Rookery Avenue, set in a well wooded and mainly residential context separated from the main part of the Solent Business Park. The ELR site appraisal form states that the site has good HGV access. The site lies to the south of Rookery Avenue a residential access road which is a cul-de-sac. Access along Rookery Avenue passes immediately adjacent to the Whiteley Primary School. Rookery Avenue is extensively used by staff and parents to access the school which has a</p>	<p>The brief for the site indicates that it is only required if the existing permission is not built out.</p> <p>Given that the site benefits from only a minimal material start (installation of part of the access road) it is not considered to be an "existing employment site" at the current time. When the site is built out it will become an "existing employment site" covered by Policy ED1. (This is stated in Policy ED2).</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont		<p>gate onto Rookery Avenue almost opposite the Solent 2 site.</p> <p>Further, paragraph 4.11 of the DS&P document is objected to. The findings of the Hampshire Economic Partnership Site Assessment Study 2009 are rejected. Not only is that report almost 4 years out-of-date, if as the report says <i>‘the site is well suited to modern business requirements’</i> has it failed to attract a purchaser or developer in over 17 years of being marketed by ABPP?</p> <p>It has been shown through the outcome of 17 years of marketing during which no purchaser or developer has come forward. Local opinion, canvassed through a Community Involvement Exercise (CIE) in 2011 showed that most local people who responded to the CIE were in favour of the use of the site for housing instead of employment uses.</p> <p>Therefore, ABPP argue that the site should be re-designated for mixed-use housing and open space uses, and specifically allocated in Chapter 8 of the DS&P document.</p>	
		<p>CHAPTER 8: MEETING HOUSING NEEDS IN THE BOROUGH OBJECTION – OVERALL HOUSING ALLOCATIONS FIGURES:</p> <p>The housing requirement for Fareham is set out in Core Strategy Policy CS2, being the provision of 3,729 additional dwellings between 2006 and 2026 (excluding the SDA). The policy explains that priority will be given to the use of previously developed land within existing urban areas.</p> <p>Paragraph 8.2 of the DS&P document states that of the 3,729 figure, 2,276 dwellings have already been delivered between 2006 and 2012 leaving a residual requirement of 1,453 dwellings to be delivered between 2012 and 2026.</p> <p>Paragraph 8.3 of the DS&P document makes reference to a recently published document by PUSH ‘ South Hampshire Strategy: A Framework to Guide Sustainable Development to 2016’ as resulting in a revised District level housing number for the remaining plan period to 2026. Taking account of completions between 2006 and 2012 this results in a revised residual requirement of 1,925 dwellings between 2012 and 2026 (excluding the SDA).</p> <p>The Table in paragraph 8.14 of the DS&P document sets out a ‘Housing Delivery</p>	

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont		<p>Overview¹. The Table provides 2 figures for the residual housing target for the period 2012 to 2026 – i.e. 1,453 derived from the adopted Core Strategy and 1,925 derived from the recently published PUSH strategy for South Hampshire.</p> <p>In relation to the supply of housing land set out in the Table there are a number of concerns.</p> <p>Firstly, in relation to planning permissions (not started) there is no guarantee that all of these sites will come forward for development, for a wide variety of reasons (e.g. land owner choice, infrastructure difficulties, long lead-in times etc). It is a well-established principle that at least a 10% discount factor should be applied in such circumstances. This would reduce the supply from this source from 138 to 124.</p> <p>Secondly, in relation to allocations rolled forward from the existing Local Plan, a similar minimum discount factor should be applied. This is because allocations brought forward from the Local Plan have been allocated for development since at least June 2000 and if they have failed to come forward during the past 12 years there must be doubt as to whether they will come forward in the future. This would reduce the supply from this source from 370 to 432, to 333 to 389.</p> <p>Thirdly, new allocations should be discounted by at least 10% to allow for non-implementation which can occur for a wide variety of reasons (e.g. land owner choice, infrastructure constraints etc). This would reduce the supply from this source from 337 to 600, to 300 to 540.</p> <p>Fourthly, in relation to the windfall allowance, Appendix F of the DS&P document explains that whilst the historic supply has been adjusted to take account of sites now identified through the SHLAA (i.e. see Tables 13 and 14), which results in an adjusted annual average of 20 dwellings for the period 2007/8 to 2011/12, the Council has then increased this by a multiplier of 50% to take account of an assumed significant up-turn in the housing market without providing any evidence or justification for what is, at best, an unsupported contention. There is no justification for this 50% increase over the adjusted historic rate. No sudden upturn in the housing market is expected by housing experts in the foreseeable future. Any increase in the housing market is expected to be a very slow process and cumulative changes can be addressed in a future review of the Core Strategy and DS&P documents. It is also relevant to have regard to the ‘impact’ of the reclassification of</p>	<p>There is no justification for reducing the figures of these sites by 10%. All these sites have been tested for viability and further work has been done on establishing the likelihood of delivery within the Plan period. Some of these sites have subsequently been removed from the supply and the Council is confident the remaining sites will be brought forward over the Plan period. The NPPF requires a buffer of 5% be applied to the supply to allow for flexibility. There is no requirement to provide a discount factor over and above this.</p> <p>Noted. The windfall allowance has been reduced and now takes account of past trends only.</p>

ID	Respondent	Comment	Proposed Council Response																																																						
REF 45 Cont .		<p>garden sites now falling outside the definition of windfalls sites, which will further reduce the windfall contribution to meeting housing needs.</p> <p>Further, ABPP considers that the Council should be seeking to meet its housing target in full without the need to rely upon windfall sites and that any windfall sites that do come forward should be viewed as a 'bonus'. Further, in this regard, it is noticed from the final paragraph of Appendix F of the DS&P document that the Council seems to accept that windfall sites should not be included in the housing land supply in Table 2 of the document. Notwithstanding an allowance of 420 dwellings in included in Table 2 on page 62 – i.e. 'Projected Windfall (h) – 420.</p> <p>Therefore, as a minimum, the windfall provision made in paragraph 8.14 Table 2 of 420 dwellings should be reduced to 280 dwellings.</p> <p>Comparison Table A: (i.e. with a reduced windfall allowance based on 20 pa)</p> <table border="0"> <thead> <tr> <th data-bbox="461 724 1115 756">Source</th> <th colspan="2" data-bbox="1122 724 1491 756">DS&P Doc</th> </tr> </thead> <tbody> <tr> <td data-bbox="461 761 1115 793">ABBP Figures</td> <td colspan="2"></td> </tr> <tr> <td data-bbox="461 793 1115 825">Core Strategy Allocations at Coldeast©</td> <td data-bbox="1122 793 1328 825">180</td> <td data-bbox="1357 793 1491 825">180</td> </tr> <tr> <td data-bbox="461 825 1115 857">Planning permissions (in progress) (d)</td> <td data-bbox="1122 825 1328 857">516</td> <td data-bbox="1357 825 1491 857">516</td> </tr> <tr> <td data-bbox="461 857 1115 888">Planning permissions (not started) (e)</td> <td data-bbox="1122 857 1328 888">138</td> <td data-bbox="1357 857 1491 888">124</td> </tr> <tr> <td data-bbox="461 888 1115 920">-10% Allocations rolled forward from the Existing Local Plan (f)</td> <td data-bbox="1122 888 1328 920">370-432</td> <td></td> </tr> <tr> <td data-bbox="461 920 1115 952">333-389</td> <td data-bbox="1122 920 1328 952">-10% New Allocations (g)</td> <td></td> </tr> <tr> <td data-bbox="461 952 1115 984">337-600</td> <td data-bbox="1122 952 1328 984">300-540</td> <td data-bbox="1357 952 1491 984">-10% Projected windfall (h)</td> </tr> <tr> <td data-bbox="461 984 1115 1016">420</td> <td data-bbox="1122 984 1328 1016">280</td> <td data-bbox="1357 984 1491 1016">-50% Total Projected Supply</td> </tr> <tr> <td data-bbox="461 1016 1115 1048">1,961-2,286</td> <td data-bbox="1122 1016 1328 1048">1,733-2,029</td> <td data-bbox="1357 1016 1491 1048">228-257–</td> </tr> </tbody> </table> <p>Comparison Table B: (i.e. without a windfall allowance)</p> <table border="0"> <thead> <tr> <th data-bbox="461 1128 1115 1160">Source</th> <th colspan="2" data-bbox="1122 1128 1491 1160">DS&P Doc</th> </tr> </thead> <tbody> <tr> <td data-bbox="461 1165 1115 1197">ABBP Figures</td> <td colspan="2"></td> </tr> <tr> <td data-bbox="461 1197 1115 1228">Core Strategy Allocations at Coldeast©</td> <td data-bbox="1122 1197 1328 1228">180</td> <td></td> </tr> <tr> <td data-bbox="461 1228 1115 1260">180</td> <td></td> <td></td> </tr> <tr> <td data-bbox="461 1260 1115 1292">Planning permissions (in progress) (d)</td> <td data-bbox="1122 1260 1328 1292">516</td> <td></td> </tr> <tr> <td data-bbox="461 1292 1115 1324">516</td> <td></td> <td></td> </tr> <tr> <td data-bbox="461 1324 1115 1356">Planning permissions (not started) (e)</td> <td data-bbox="1122 1324 1328 1356">138</td> <td></td> </tr> <tr> <td data-bbox="461 1356 1115 1388">124</td> <td data-bbox="1122 1356 1328 1388">-10% Allocations rolled forward from the Existing Local Plan (f)</td> <td data-bbox="1357 1356 1491 1388">370-</td> </tr> </tbody> </table>	Source	DS&P Doc		ABBP Figures			Core Strategy Allocations at Coldeast©	180	180	Planning permissions (in progress) (d)	516	516	Planning permissions (not started) (e)	138	124	-10% Allocations rolled forward from the Existing Local Plan (f)	370-432		333-389	-10% New Allocations (g)		337-600	300-540	-10% Projected windfall (h)	420	280	-50% Total Projected Supply	1,961-2,286	1,733-2,029	228-257–	Source	DS&P Doc		ABBP Figures			Core Strategy Allocations at Coldeast©	180		180			Planning permissions (in progress) (d)	516		516			Planning permissions (not started) (e)	138		124	-10% Allocations rolled forward from the Existing Local Plan (f)	370-	<p>The Council has a historic trend of windfall delivery which provides justification for its inclusion. This is consistent with the NPPF.</p>
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ID	Respondent	Comment	Proposed Council Response
REF 45 Cont .		<p>432 333-389 -10% New Allocations (g) 337-600 300-540 -10% Projected windfall (h) 420 0 -100% Total Projected Supply 1,961-2,286 1,453-1,749 508-537-</p> <p>Taken in the context of the recently adjusted residual housing requirement for 2012 to 2026 for Fareham of 1,925, this results in a range of between +104 and -192 dwellings in the example of Comparison Table A (i.e. including windfalls at the historic rate of 20 pa), and a deficit of between 176 and 472 in the example of Comparison Table B. These results cast serious doubt about whether the Council will, in practice, be able to meet its residual housing target between 2012 and 2026.</p> <p>These circumstances point to need to identify additional housing allocations in the DS&P document.</p>	
		<p>CHAPTER 8: MEETING HOUSING NEEDS IN THE BOROUGH OBJECTION: OMISSION OF THE ALLOCATION OF THE SOLENT 2 SITE FOR MIXED USE RESIDENTIAL AND OPEN SPACE.</p> <p>ABPP has been promoting the re-designation of its Solent 2 site from employment to a mixed use residential and open space scheme since 2010, following the continuous, although unsuccessful, marketing of the site for commercial development since the original grant of outline planning permission in 1993.</p> <p>The land was been allocated for employment purposes in Policy E3 of the Fareham Local Plan Review 2000, and before that in the Whiteley Local Plans.</p> <p>Planning permission was first granted for the site in 1993 and was been regularly renewed up to the approval of Reserved Matters in 2008, and thereafter the discharge of the relevant planning Conditions. The permission was lawfully implemented in September 2001 by undertaking certain works, following the taking of Counsel's advice. The process was duly recorded.</p> <p>Despite the site having been continuously marketed by ABPP for over 17 years no purchaser or developer has come forward and the site lies vacant and un-used. The site lies within the defined built-up area boundary.</p> <p>A number of submissions have been made to the Council over the past 2 years</p>	<p>The evidence from the Wessex Economics study has identified that the Council can meet its overall requirement for employment floorspace. However, it does note that there is an undersupply of offices which is compensated for by an oversupply of industrial/warehouse floorspace.</p> <p>The Employment Study concludes that Solent 2 is a good location for employment and that there is a reasonable prospect of the site coming forward in the Plan period. Given that the Solent 2 site makes up almost 65% of the overall supply of office floorspace during the plan period its importance cannot be underestimated.</p> <p>Given the sites value as an employment allocation, coupled with the Council's ability to meet its housing supply targets on alternative sites there is no necessity to allocate this site for residential development.</p>

ID	Respondent	Comment	Proposed Council Response
REF 45 Cont		<p>promoting the re-designation of the site and a series of high level meetings have been held with Officer's and Members of the Council.</p> <p>Submissions have been made in respect of the SHLAA and an Informal Submission document was submitted to the Council in 2011. A Community Involvement Exercise (CIE) was undertaken in July 2011. The majority of respondents considered that the site could be better used for housing and open space rather than employment.</p> <p>Marketing information was submitted to the Council in April 2012 showing the history of the marketing of the site and the lack of interest being shown in the site by potential purchasers/developers.</p> <p>Given the no n-development of the site for employment uses extending back over a period of 17 years, coupled to its disadvantageous location (i.e. in a residential context), there is a robust case for the re-designation of the land for housing and open space. Paragraph 4.11 of the adopted Core Strategy makes provision for such site reassessments.</p> <p>A Development Brief was prepared for the site in 1991 and the extant planning permission had careful regard to the Brief and its requirements. Applying the same requirements to the site in the context of a potential housing and open space scheme the site could provide up to 160 dwellings, (on a site area of 9.98 ha, approximately 6 ha net) plus the retention of areas of Ancient Woodland, and provision of new open space. The site could provide up to 40% affordable housing (i.e. 64 units) under the provisions of Core Strategy Policy CS18.</p> <p>The site is readily available, suitable for housing development, and deliverable. The site lies in a sustainable location close to the local Primary School, Local Centre, the Whiteley District Centre, railway station, public transport, employment and other services and facilities.</p> <p>The site should therefore be allocated in the DS&P document for housing and open space, with an approximate capacity of 160 dwellings. The site lies within the defined limits of the built-up area and in a sustainable location.</p> <p>The site could make a significant contribution towards ensuring that the Council meets its residual housing requirement for the period 2012-2026, which would</p>	

ID	Respondent	Comment	Proposed Council Response
		<p>contribute to addressing the significant oversupply of employment floorspace and the lack of contingency in the Council's housing supply projections.</p> <p>In addition, the economic benefits of new housing should not be overlooked and should be afforded considerable weight by the decision maker. Research carried out by Nathaniel Lichfield & Partners has shown that there are considerable economic benefits from the construction of new houses including:</p> <ul style="list-style-type: none"> • Construction jobs; • Investment; • Benefits to local material suppliers; • Indirect jobs in the construction-chain; • Additional expenditure from new residents; • Boosting Council's revenue (New Homes Bonus, Council Tax); • Local infrastructure provision (schools, transport and community facilities); • Improving economic efficiency of workers and sustainability by allowing workers to live closer to employment areas; and • Wider impacts through improving an area's attractiveness and sign-posting it as an area of significant investment. <p>It is also important not to lose sight of the broader Government objectives to significantly increase the 'delivery' of new homes (in particular affordable housing). It is well-established that the need for new housing in England exceeds 250,000 per annum. CLG figures indicate that in 2010/2011 net annual new-build completions were 117,500 and 128,160 in 2011/2012; far below the levels need to meet the housing needs of the country.</p>	
REF 46	HCC	<p>Policy DS2 Locks Heath District Centre</p> <p>The current masterplanning consultation on the future of Locks Heath District Centre is noted and the County Council will respond to that consultation under separate cover.</p> <p>However, the County Council would like to highlight the need for improved and ideally expanded library services as part of the district centre regeneration, justified due to the high levels of patronage at the existing facility. The policy wording of DS2 should be expanded at pre-submission stage, once the outcome of the masterplanning exercise is known.</p>	Noted. The Council is aware of the value of the library in the Locks Heath District Centre and will investigate the potential for improved facilities if possible.

ID	Respondent	Comment	Proposed Council Response
REF 46 Cont .		<p>Paragraph 7.4 Amend to read "There are currently two Air Quality Management Areas (AQMAs) within the Borough, at Portland Street and A27 Gosport Road in Fareham. These were required because of the severe congestion in these areas during the morning and evening peaks and the relatively high traffic flows throughout the day. The recently reconfigured A27 Quay Street roundabout has improved this situation, however, the air quality within these areas would be further improved if traffic flows on these and adjacent roads could be reduced."</p> <p>Paragraph 7.7 "A27" Delete: "Two areas of land are currently displayed on the Proposals Map for safeguarding; Bishopsfield Road to Redlands Lane; and Southampton Road near Southampton Hill"</p> <p>Replace with: 'Whilst it is too early at this stage to identify specific land requirements, it is likely that some land will be needed to facilitate widening in the areas of the route which are currently single carriageway.'</p> <p>Paragraph 7.9 Newgate Lane Delete the existing paragraph and replace with the following:</p> <p>Planned improvements to Newgate Lane will enhance access to the borough within the Gosport peninsula. The improvements aim to mitigate current congestion levels on Newgate Lane and have the potential to reduce travel on other alternative traffic routes in the borough. They also have the potential to provide additional capacity to accommodate future proposed development in the Stubbington area, including employment land at Daedalus. Additional land will be required and should be safeguarded once detailed requirements are known.</p> <p>Comment: The land identified on the proposals map for schemes at Newgate Lane and A27 is incorrect. Also land may be needed for improvements to the A27 on the approach to Delme roundabout which isn't mentioned. The policy wording needs amending to avoid blighting properties and avoids objections to proposals that are incorrect as currently shown.</p> <p>Paragraph 7.12 "Station Roundabout and Transport Interchange, Fareham"</p>	<p>Noted. This paragraph has been amended.</p> <p>Noted. This paragraph has been amended.</p> <p>Noted. This paragraph has been amended.</p> <p>Noted. This paragraph has been amended.</p>

ID	Respondent	Comment	Proposed Council Response
REF 46 Cont .		<p>Delete: 'Land has been identified at station roundabout...'. Add: "Land will be identified when the requirements are known to facilitate improvements for all transport modes at this important junction."</p> <p>Paragraph 7.13 "Station Roundabout and Transport Interchange, Fareham" Delete: "to facilitate the movement of the BRT Eclipse services towards Portsmouth and to improve facilities for pedestrians and cyclists. It is currently considered that these improvements will not require land beyond the current carriageway therefore no land is identified on the Proposals Map for safeguarding." Add: "to facilitate the movement of the BRT services to and from Portsmouth with improvements in the form of priority measures, which do not compromise the running space for other vehicles, planned on the westbound approach to the roundabout, along with improvements for pedestrians and cyclists. There may be a requirement for some third party land to help deliver this proposal and land will be safeguarded once the requirements are known."</p> <p>Policy T2 "Improvements to the Strategic Road Network" Amend to read: "Land will be safeguarded once the requirements are known for the following proposals which will improve and maintain the effectiveness of the Strategic Road Network: (A) A27 Dualling; (B) B3385 Newgate Lane, Fort Fareham - Peel Common; Land will be safeguarded once the requirements are known for the following proposals which will improve and maintain the effectiveness of the junctions on the Strategic Road Network: (i) Segensworth Roundabout; (ii) A27/West Street/Station roundabout; (iii) Delme roundabout and A27 approaches;</p> <p>Policy T3 "Improvements to the Distributor Road Network" Delete Policy - The Western Local Distributor Road, Warsash is now complete.</p> <p>Paragraph 7.14 Gosport-Fareham Link Road and Western Approach to Gosport</p>	<p>Noted. This paragraph has been amended.</p> <p>Noted. However the DSP Plan cannot make allowances for future allocations. Land must be identifiable on the Policies Map.</p> <p>Noted. This paragraph has been amended.</p>

ID	Respondent	Comment	Proposed Council Response
REF 46 Cont .		<p>to Western Approach to Gosport (Gosport Fareham Link is partially complete and no longer exists as a scheme so delete this part of title) 7.14 This is a major scheme that may be challenging to implement but could be potentially viable post 2026. The scheme has not yet been worked up in detail, therefore no indication of land safeguarding is made on the Proposals Map. However, the scheme still forms part of HCC's longer term aspirations for the Borough delete following....and it is felt that reference should be made to them as it is possible that they will come forward in the future.</p> <p>This change is necessary to ensure consistency with the emerging Transport Delivery Plan.</p>	
		<p>Croft House, Redlands Lane, Fareham Please note that supporting text on 'Planning Status' and 'Key Planning and Design Issues' should reflect that the site is in operational use. However it is expected to become available within the Plan period as a result of improved accommodation elsewhere.</p>	Noted. This has been amended.
		<p>Former school site, Heath Road, Locks Heath The proposed allocation for residential use is supported, as Children's' Services have deemed the site surplus to requirements for educational use. Any proceeds of sale will be used to reinvest in local education improvements and school capacity. The allocation includes land in third party ownership. It should be noted that previous planning work prepared by the County Council demonstrated a potential capacity of 67 dwellings on the County Council land alone, and as such the site may yield a capacity greater than 80 dwellings. The site is adjacent to Locks Heath District Centre, which is subject to draft Policy DS2 and a concurrent masterplanning consultation. The relationship between the two sites needs to be considered in the masterplan in terms of access, open space provision and neighbourliness.</p>	Noted. The capacity figures have been altered. Any further work on Locks Heath District Centre will have due consideration to the School Site, Heath Road.
		<p>Policy H3 New Older People's Housing: Support Policy H3 is supported, as it will help to deliver older people's housing, in line with the County Council's £45 million programme of investment towards extra-care accommodation across the County.</p>	Noted.
		<p>Land at Hunts Pond Road: Comment It is noted that the supporting text to this chapter refers to the desire for '<i>Community facilities, open space and recreation (and uses ancillary to community and recreation</i></p>	The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will

ID	Respondent	Comment	Proposed Council Response
REF 46 Cont .		<p>uses)' at Hunts Pond Road. This land is mostly surplus to education requirements and was submitted as part of the Borough Council's 'call for sites' exercise last year. It remains available for a mixed housing and open space allocation, if required to meet local housing targets.</p> <p>Policy CF1 Community Facilities: Support Paragraph 70 of the National Planning Policy Framework (NPPF) requires that local authorities guard against the '<i>unnecessary loss of valued facilities and services</i>', a principle which the County Council strongly supports. However there may be circumstances where there is a 'necessary loss'. As transformation of public services continues apace, more effective solutions can be found by concentrating and sharing services within a single building, by providing services in customer's homes or in high street locations, or providing new facilities.</p> <p>Policy CF1 appears to be effective in recognising the distinction between public service providers and facilities, which have a continuing interest in and support for their communities, and private operations such as public houses or local shops which can be lost permanently. This approach goes beyond traditional land use planning and integrates policies for development and the role of public service organisations, in line with paragraph 2.10 of the Planning Inspectorate's Local Development Frameworks Examining Development Plan Documents: Soundness Guidance (2009).</p> <p>Paragraph 10.27 The County Council considers that there could helpfully be clearer reference (at paragraph 10.27) to opportunities to develop the Rights of Way network to mitigate greenspace deficiencies by creating green corridors between areas of accessible natural greenspace. This is supported by the PUSH Green Infrastructure Strategy, which includes an objective for Theme IV (Access to the countryside and green spaces, providing recreational opportunities and experiences - page ii of PUSH document) to 'Create, maintain and promote a network of high quality, multifunctional, interconnected routes to provide a network of linear access for a variety of users'. A challenge for achieving this in Borough of Fareham is (as identified in the Countryside Access Plan for the Solent area) that the rights of way network is particularly fragmented in this part of Hampshire. Any opportunity to address through development would therefore be welcomed.</p> <p>It would be helpful if the following text could be added to paragraph 10.27 (or as a</p>	<p>be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p> <p>Noted.</p> <p>The Council will consider connections of footpaths and the Rights of Way network as part of the Green Infrastructure Strategy that will be adopted alongside the Development Sites & Policies Plan.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>separate paragraph) in regard to specific projects:</p> <p>A further project is the Meon Valley Trail bridleway, which forms an important link in Hampshire County Council's emerging Countryside Recreation Network, an aspiration for an "easy to use, easy to follow network for walking, cycling and horse-riding, linking communities to their countryside across Hampshire". Hampshire County Council and the South Downs National Park Authority both wish to resolve a half-mile gap at Knowle so that the Trail links Fareham's urban population and the sea at Titchfield Haven to the South Downs. With the exception of the Knowle gap, this route exists physically but has little promotion, signposting to local villages or facilities, or interest in terms of views, activities or features along the way. It is little known except by local people and falls far short of its potential in terms of attracting use, encouraging sustainable recreation, green tourism and supporting the rural economy.</p> <p>Policy CF2 Existing open space: Comment It is requested that Policy CF2 makes reference to Section 77 of the School Standards and Framework Act 1998, which provides a justified mechanism to enable surplus school playing fields to be sold subject to the approval of the Secretary of State, with any proceeds of sale being reinvested in local education or re-provision of open space elsewhere.</p> <p>Paragraph 5.48/49 and 5.56/Policy TC10 Fareham Library The Library Service would in principle be willing to move to the Market Quay site, providing the floor space provided was equivalent to the public floor space in the current library and the new library had public access to or was at least clearly visible from the Henry Court pedestrian area.</p> <p>The County Council is concerned, however, that the vision for the future of Fareham Town Centre may not have taken into account that Fareham library requires parking space for 2 mobile libraries, including charging facilities and close proximity to the library for daily exchange of stock. There are also partners based in Fareham Library building, including the Schools Library Service and the CAB who will also require space. This needs to be reflected in the policy / text (paragraph 5.56)</p>	<p>The Council's approach to playing pitches, both public and private, is set out in Core Strategy Policy CS21. This approach was adopted as part of the Core Strategy in 2011.</p> <p>Any redevelopment proposals including the library will involve ongoing dialogue with the library service to ensure their requirements are met. The Council understands the important role the library plays as a well-used service within the Town Centre.</p>
REF 47	Southern Planning	Paragraph 3.2 of the draft Plan states that: <i>'The Urban Area and Defined Urban Settlement Boundaries (DUSB) show the extent of the built-up area of settlements</i>	"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of

ID	Respondent	Comment	Proposed Council Response
REF 47	Practice on behalf of Mr Alan Coombs	<p><i>across the Borough.</i></p> <p>In fact, the draft Plan does not show the extent of the built-up area of all of the settlements in the Borough as Burridge is not included. The village has over 200 homes and a good range of facilities, including recreation and employment. There are bus services to Fareham and Hedge End and Swanwick railway station is nearby.</p> <p>The DPD places Burridge in the 'countryside' where Policies C1, 2 and 3 (and CS6 and 14) would apply. This is clearly incorrect as the village is a sizeable settlement and not a small group of houses in the countryside, where the countryside policies would be appropriate.</p> <p>Paragraph 13.4 of the DPD states that: <i>'The countryside in Fareham is situated in relatively narrow areas, between the main settlements and along the coast.'</i></p> <p>However, this is clearly not the case when the Proposals Map for the whole Borough is looked at. The map shows large areas of land as countryside, including the area north of the M27 which is proposed in the Core Strategy as the location for the new community North of Fareham.</p> <p>In the north westernmost part of the Borough, the countryside designation covers all of Burridge and parts of Swanwick. These are quite clearly developed areas with a range of community facilities.</p> <p>As currently drafted, the DPD would make any development in Burridge difficult to achieve.</p> <p>Policy C1 prevents any residential development except when:</p> <ul style="list-style-type: none"> i) it is required to meet the essential need for a rural worker to live permanently at or near the place of work, or ii) it involves the conversion of an existing permanent building where no other suitable uses can be found for it and it would lead to an enhancement of the immediate setting, or iii) it is a replacement dwelling that reduces the impact of development on the 	<p>previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that "planning should...encourage the effective use of land by reusing land that has been previously developed [1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p>

ID	Respondent	Comment	Proposed Council Response
Cont		<p>countryside location, or</p> <p>iv) the dwelling proposed is of exceptional quality or innovative design.</p> <p>Policy C2 allows for some limited leisure and recreation development in the countryside – but only if no other more suitable sites are available within the main town and district centres. Any schemes proposed should not have a detrimental impact on the local road network and the amenity of residents, nor have a detrimental impact on the character of the landscape of the surrounding area.</p> <p>Policy C3 strictly controls new employment development in the countryside. Existing buildings should be re-used wherever possible before new buildings are allowed. New economic development uses would only be allowed if no suitable alternative sites were available in the urban area. In all cases, the scale of the development will be limited and there should be no unacceptable traffic implications arising from the development.</p> <p>None of these policies is appropriate for the village of Burr ridge.</p> <p>Proposed Change to the Development Sites and Policies DPD:</p> <p>1. Amend the plan to include a settlement boundary for Burr ridge. A proposed boundary is shown on the attached Map 1.</p>	
		<p>Summary of comments Our client is concerned about the way in which the Council has calculated the amount of housing land available in the Borough for the remainder of the plan period (2012 – 2026). He believes that the Council has not demonstrated that it has a deliverable supply of housing land and that further deliverable site allocations are required, especially for the period 2017/18 – 2025/26.</p> <p>Our client proposes that additional land must be made available for development in the Borough. He proposes that a policy boundary is drawn around Burr ridge and that some land in the village should be allocated for development.</p> <p>A) Housing Land Supply i) Windfall sites The Plan is confusing about the status of windfall sites and whether they form part of</p>	Noted. This has been amended to reflect

ID	Respondent	Comment	Proposed Council Response
REF 47 Cont .		<p>the Council's land supply calculations for the whole plan period.</p> <p>Paragraph 8.5 of the Plan states that a windfall allowance has been included, in line with the provision set out in paragraph 48 of the NPPF. A windfall figure of 420 dwellings has also been included in paragraph 8.13.</p> <p>However, in the penultimate paragraph of Appendix F, the Council states that it has identified a sufficient supply of housing land to meet its strategic requirements over the remaining part of the plan period (2012 – 2026) <u>without the need to include a windfall allowance</u>.</p> <p>The housing trajectory shows a windfall allowance of 30 dwellings per year throughout the remainder of the plan period (2012 – 2026) – a total of 420 dwellings.</p> <p>The NPPF (paragraph 48) states that: <i>'Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.</i></p> <p>The Council has not given evidence to show whether the windfall sites developed over the last 5 years exclude garden land. Until the situation is clarified, this casts doubt on the actual number of windfall site homes built in the last 5 years and thus the figure that should be used as the annual average.</p> <p>Our client also believes there is uncertainty about whether 30 dwellings per year will be achieved on windfall sites in the future, bearing in mind the low completion rates over the last 4 years (2008/9 – 2011/12) shown in Table 14 of Appendix F (Adjusted Historic Windfall Rates). During this period between 11 and 19 homes were built using the adjusted methodology.</p> <p>Our client believes that the Council should only be including a windfall figure for the first five years of the remaining plan period - that is, for the period 2012/13 – 2016/17. The 270 homes shown on windfall sites for the period 2017/18 – 2025/26 should be deleted from the calculations and the trajectory.</p>	<p>more accurate historic trends.</p> <p>The windfall allowance has been amended to represent historic trends. This has shown that on average 20 "windfall" units have been delivered annually. Multiplying this figure by the remaining 13 years of the plan provides a new windfall total of 260.</p> <p>This has now been amended, with a more robust windfall calculation being shown.</p> <p>The windfall allowance is now only being shown for the first five year period of the Plan (2013-2018).</p>

ID	Respondent	Comment	Proposed Council Response
REF 47 Cont .		<p>Proposed amendments:</p> <p>i) Amend the penultimate paragraph of Appendix F to reflect the position of windfall sites in the housing land supply calculations.</p> <p>ii) Review the windfall allowance calculation to ensure it meets the NPPF's requirements and to reflect the much lower building rates of the last 4 years (2008/9 – 2011/12).</p> <p>iii) Delete the windfall allowance of 270 homes from for the period 2017/18 – 2025/26 from the land supply calculations.</p> <p>iv) Allocate sites for an additional 270 homes in the revised DPD.</p> <p>b) Town Centre Proposals</p> <p>Our client considers that the proposals for the redevelopment of parts of Fareham Town Centre are likely to be very slow in coming forward. There is also a great deal of uncertainty about the total number of homes that could be provided in the Town Centre. The Plan includes a figure of between 140 and 354 homes.</p> <p>Our client considers that the potential for residential development in the Town centre should be noted in the Plan but, at this stage, no figure be included in the land supply calculations as there is too much uncertainty about the developability and deliverability of the sites.</p> <p>Proposed amendments:</p> <p>i) Delete the Town Centre from the housing land supply calculations.</p> <p>ii) Allocate sites for an additional 350 homes in the revised DPD.</p> <p>c) Proposed housing allocations</p> <p>Our client considers that some of the sites listed in the draft DPD may take a long time to come forward for development. This brings into doubt the deliverability of some of the sites.</p> <p>A number of the proposed allocations involve the redevelopment of brownfield sites where there are concerns about contamination. Remedial works could be very expensive.</p> <p>Many of the sites are listed as having (or potentially having) features of ecological and archaeological interest, which will need to be taken into account when the detailed plans for the sites are prepared. This may affect the total amount of land</p>	<p>A number of the Town Centre sites have been removed from the housing totals due to issues of viability. However, a number of the sites within the Town Centre can be demonstrated to be developable over the Plan period and can therefore justifiably contribute towards overall housing targets.</p> <p>A number of the previous allocations have been removed from the housing totals due to issues of viability, flooding and ecology (impact on the SPA). However, the DSP Plan can still demonstrate that the housing target can be met within sites in the existing urban area.</p>

ID	Respondent	Comment	Proposed Council Response
REF 47 Cont .		<p>available for development on certain sites, and the density of development that will be allowed.</p> <p>Our client also notes that 8 housing sites are proposed to be 'rolled forward' as allocations from the Local Plan Review (2000 – 2006). These sites have been available for development since 2000. Our client questions whether there is certainty that all of the sites will come forward for development. For example, some of the sites are in multiple ownerships and this could continue to delay their development.</p> <p>Proposed amendments: i) Allocate additional sites with fewer environmental and ownership constraints in order to ensure sufficient developable land is available for development, particularly in the period from 2017/18 onwards.</p> <p>B) Need for Additional Housing Site Allocations Our client considers there is a much greater degree of uncertainty about the amount of housing land available in the Borough than the Council states, especially for the period from 2017/18 onwards, where the Council admits it has a shortage of housing land supply. He considers that further land must be allocated in the revised DPD for residential development that is easily developable and has fewer constraints than those proposed in the draft Plan.</p> <p>Our client believes that the Council has drawn the settlement boundaries too tightly and so is constraining the amount of developable land that is available for development. For instance, not all of the settlements in the Borough have a policy boundary and are treated as countryside for planning purposes, even though they are quite obviously not areas of countryside.</p> <p>Such settlements include Burr ridge, which is a very sustainable location for further development. The village has over 200 homes and a good range of facilities, including recreation and employment. There are bus services to Fareham and Hedge End and Swanwick railway station is nearby.</p> <p>Our client proposes that a policy boundary should be drawn around Burr ridge showing the full extent of the village and allowing for some smaller site development. Under the comments on chapter 3, he has submitted a proposed boundary for the village.</p>	<p>The Council considers that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites outside the urban area boundaries.</p>

ID	Respondent	Comment	Proposed Council Response
REF 47 Cont		<p>Our client owns land at 187, Botley Road, Burr ridge, which has been put forward for inclusion in the SHLAA.</p> <p>Proposed amendments:</p> <p>i) Include a settlement policy boundary for Burr ridge in the revised DPD.</p> <p>ii) Include land at 187, Botley Road, Burr ridge within the settlement boundary, as proposed by our client in his SHLAA submission made in December, 2011. (See maps attached.)</p>	
REF 48 Cont	Southern Planning Practice on behalf of Mr Nigel Kendall	<p>Paragraph 3.2 of the draft Plan states that: <i>'The Urban Area and Defined Urban Settlement Boundaries (DUSB) show the extent of the built-up area of settlements across the Borough.'</i></p> <p>In fact, the draft Plan does not show the extent of the built-up area of all of the settlements in the Borough as Burr ridge is not included. The village has over 200 homes and a good range of facilities, including recreation and employment. There are bus services to Fareham and Hedge End and Swanwick railway station is nearby.</p> <p>The DPD places Burr ridge in the 'countryside' where Policies C1, 2 and 3 (and CS6 and 14) would apply. This is clearly incorrect as the village is a sizeable settlement and not a small group of houses in the countryside, where the countryside policies would be appropriate.</p> <p>Paragraph 13.4 of the DPD states that: <i>'The countryside in Fareham is situated in relatively narrow areas, between the main settlements and along the coast.'</i></p> <p>However, this is clearly not the case when the Proposals Map for the whole Borough is looked at. The map shows large areas of land as countryside, including the area north of the M27 which is proposed in the Core Strategy as the location for the new community North of Fareham.</p> <p>In the north westernmost part of the Borough, the countryside designation covers all of Burr ridge and parts of Swanwick. These are quite clearly developed areas with a range of community facilities.</p> <p>As currently drafted, the DPD would make any development in Burr ridge difficult to</p>	<p>"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed [1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p>

ID	Respondent	Comment	Proposed Council Response
REF 48 Cont .		<p>achieve.</p> <p>Policy C1 prevents any residential development except when:</p> <ul style="list-style-type: none"> i) it is required to meet the essential need for a rural worker to live permanently at or near the place of work, or ii) it involves the conversion of an existing permanent building where no other suitable uses can be found for it and it would lead to an enhancement of the immediate setting, or iii) it is a replacement dwelling that reduces the impact of development on the countryside location, or iv) the dwelling proposed is of exceptional quality or innovative design. <p>Policy C2 allows for some limited leisure and recreation development in the countryside – but only if no other more suitable sites are available within the main town and district centres. Any schemes proposed should not have a detrimental impact on the local road network and the amenity of residents, nor have a detrimental impact on the character of the landscape of the surrounding area.</p> <p>Policy C3 strictly controls new employment development in the countryside. Existing buildings should be re-used wherever possible before new buildings are allowed. New economic development uses would only be allowed if no suitable alternative sites were available in the urban area. In all cases, the scale of the development will be limited and there should be no unacceptable traffic implications arising from the development.</p> <p>None of these policies is appropriate for the village of Burrige.</p> <p>Proposed Change to the Development Sites and Policies DPD:</p> <p>1. Amend the plan to include a settlement boundary for Burrige. A proposed boundary is shown on the attached Map 1.</p>	
		<p>Summary of comments</p> <p>Our client is concerned about the way in which the Council has calculated the amount of housing land available in the Borough for the remainder of the plan period (2012 – 2026). He believes that the Council has not demonstrated that it has a deliverable supply of housing land and that further deliverable site allocations are required, especially for the period 2017/18 – 2025/26.</p>	<p>The windfall allowance has been amended to represent historic trends. This has shown that on average 20 "windfall" units have been delivered annually. Multiplying this figure by the remaining 13 years of the plan provides a new windfall total of 260.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>time to come forward for development. This brings into doubt the deliverability of some of the sites.</p> <p>A number of the proposed allocations involve the redevelopment of brownfield sites where there are concerns about contamination. Remedial works could be very expensive.</p> <p>Many of the sites are listed as having (or potentially having) features of ecological and archaeological interest, which will need to be taken into account when the detailed plans for the sites are prepared. This may affect the total amount of land available for development on certain sites, and the density of development that will be allowed.</p> <p>Our client also notes that 8 housing sites are proposed to be 'rolled forward' as allocations from the Local Plan Review (2000 – 2006). These sites have been available for development since 2000. Our client questions whether there is certainty that all of the sites will come forward for development. For example, some of the sites are in multiple ownerships and this could continue to delay their development.</p> <p>Proposed amendments:</p> <p>i) Allocate additional sites with fewer environmental and ownership constraints in order to ensure sufficient developable land is available for development, particularly in the period from 2017/18 onwards.</p> <p>B) Need for Additional Housing Site Allocations</p> <p>Our client considers there is a much greater degree of uncertainty about the amount of housing land available in the Borough than the Council states, especially for the period from 2017/18 onwards, where the Council admits it has a shortage of housing land supply. He considers that further land must be allocated in the revised DPD for residential development that is easily developable and has fewer constraints than those proposed in the draft Plan.</p> <p>Our client believes that the Council has drawn the settlement boundaries too tightly and so is constraining the amount of developable land that is available for development. For instance, not all of the settlements in the Borough have a policy boundary and are treated as countryside for planning purposes, even though they are</p>	<p>of viability. However, a number of the sites within the Town Centre can be demonstrated to be developable over the Plan period and can therefore justifiably contribute towards overall housing targets.</p> <p>A number of the previous allocations have been removed from the housing totals due to issues of viability, flooding and ecology (impact on the SPA). However, the DSP Plan can still demonstrate that the housing target can be met within sites in the existing urban area</p>

ID	Respondent	Comment	Proposed Council Response
		<p>quite obviously not areas of countryside.</p> <p>Such settlements include Burr ridge, which is a very sustainable location for further development. The village has over 200 homes and a good range of facilities, including recreation and employment. There are bus services to Fareham and Hedge End and Swanwick railway station is nearby.</p> <p>Our client proposes that a policy boundary should be drawn around Burr ridge showing the full extent of the village and allowing for some smaller site development. Under the comments on chapter 3, he has submitted a proposed boundary for the village.</p> <p>Our client, together with his sister, Mrs Margaret Coombs, owns land at 187, Botley Road, Burr ridge, which has been put forward for inclusion in the SHLAA.</p> <p>Proposed amendments:</p> <p>i) Include a settlement policy boundary for Burr ridge in the revised DPD.</p> <p>ii) Include land at 187, Botley Road, Burr ridge within the settlement boundary, as proposed by our client in his SHLAA submission made in December, 2011. (See maps attached.)</p>	<p>The Council considers that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites in the countryside.</p>
REF 49	Southern Water	<p>The domestic aspects only of sites policies TC9-TC17 have been assessed with respect to water supply and sewerage capacity and have also been checked for Southern Water infrastructure crossing the site. A summary of the information is in the accompanying spreadsheet.</p> <p>Regarding the accompanying spreadsheet, please note:</p> <ul style="list-style-type: none"> • The non-domestic aspect of the proposed developments has not been assessed. • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design must ensure it does not build over existing infrastructure. Access must be maintained or infrastructure diverted at the developer's expense. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to 	<p>Noted. Reference to capacity and of sewers and presence of Southern Water infrastructure has been added to individual site briefs for clarity.</p>

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>prevent land-use conflict.</p> <p>Below, I have written site-by-site representations and proposed policy text where necessary.</p> <p><u>TC9- Civic Area</u> Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC9 should protect these facilities for existing and new residents. We propose the following policy text:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC10- Market Quay</u> Southern Water infrastructure crosses the site- proposed policy amendment</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>Southern Water sewerage infrastructure crosses this site, including multiple sewers. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC10 should protect these facilities for existing and new residents. We propose the following:</p> <p><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>TC11(a)- Fareham Shopping Centre Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC11(a) should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>TC11 (b)- Fareham Shopping Centre Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC11(b) should protect these facilities for existing and new residents. We propose the following:</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>TC12- Fareham Station West Insufficient sewerage capacity- proposed policy amendment</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater in planning policies. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges.</p> <p>We propose that the following text is included in policy TC12 to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>TC12- Fareham Station West contd. Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>We therefore take the view that policy TC12 should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC13- Fareham Station East</u> Insufficient sewerage capacity- proposed policy amendment</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont		<p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater in planning policies. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges.</p> <p>We propose that the following text is included in policy TC13 to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC13- Fareham Station East contd.</u> Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site including multiple sewers . Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC13 should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC14- Rear of Red Lion and Bath Lane Car Park</u> Insufficient sewerage capacity- proposed policy amendment</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p> <p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater in planning policies. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges.</p> <p>We propose that the following text is included in policy TC14 to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC14- Rear of Red Lion and Bath Lane Car Park contd.</u> Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC14 should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC15- Maytree Road</u> Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>We therefore take the view that policy TC15 should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC16- Russell Place</u> Insufficient sewerage capacity- proposed policy amendment</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater in planning policies. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges.</p> <p>We propose that the following text is included in policy TC16 to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC16- Russell Place contd</u> Southern Water infrastructure crosses the site- proposed policy amendment</p> <p>Southern Water sewerage infrastructure crosses this site close to the boundary. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont		<p>should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that policy TC16 should protect these facilities for existing and new residents. We propose the following:</p> <p style="text-align: center;"><i>Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>TC17- Corner of Trinity Street & Osborn Road</u></p> <p>We currently have no comments regarding policy considerations for site TC17- Corner of Trinity Street & Osbourn Road.</p>	
		<p><u>Chapter 8- Meeting Housing Needs in the Borough</u></p> <p>The sites of 20 dwellings and more in chapter 8 have been assessed with respect to water supply and sewerage capacity and have also been checked for Southern Water infrastructure crossing each site.</p> <p>A summary of the information is in the accompanying spreadsheet. Regarding the accompanying spreadsheet, please note:</p> <ul style="list-style-type: none"> • The non-domestic aspect of the proposed developments has not been assessed. • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come 	Noted. Reference to capacity and of sewers and presence of Southern Water infrastructure has been added to individual site briefs for clarity.

ID	Respondent	Comment	Proposed Council Response
REF		<p>first served basis.</p> <ul style="list-style-type: none"> • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design must ensure it does not build over existing infrastructure. Access must be maintained or infrastructure diverted at the developer's expense. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. • The following sites have not been assessed as the net gain of dwellings is below 20: Croft House, Redlands lane; Citroen Garage, Wickham Road; Hope Lodge, Fareham Park Road; Former Community facilities, Wynton Way; Land between 335 and 357 Gosport Road; Seaeve House, Lower Quay; Collingwood House, Gibraltar Close; 118 Bridge Road, Sarisbury; Land to rear of Swinton Hall, 80 Warsash Road; Land at corner of Station Road and A27, Portchester; Land at Stubbington Lane, Stubbington; Land at Sea Lane, Stubbington. <p>Below, I have written site-by-site representations and proposed additional text for each development brief where necessary.</p> <p>Hinton Hotel, Catisfield (35 dwellings) In sufficient sewerage capacity- proposed amendment of development brief</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p>	

ID	Respondent	Comment	Proposed Council Response
49 Cont .		<p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges. We look to the development brief to reflect this approach to give early warning of this issue to potential developers.</p> <p>We propose that the following text is included in the site development brief to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>There is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site. The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Hinton Hotel, Catisfield (35 dwellings) contd Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p style="text-align: center;"><i>Southern Water sewerage infrastructure crosses this site. This should be clear of</i></p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p><i>all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>Bus Depot, Gosport Road (32 dwellings) Insufficient sewerage capacity- proposed amendment of development brief</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p> <p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased general charges. We look to the development brief to reflect this approach to give early warning of this issue to potential developers.</p> <p>We propose that the following text is included in the site development brief to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p style="text-align: center;"><i>There is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site. The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p>Peters Road, Sarisbury (257 dwellings) Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow</p>	

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REF 49 Cont .		<p>easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing. Also see accompanying spreadsheet, but please note:</i></p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>East of Raley Road, Locks Heath (50 dwellings)</u> Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these</p>	

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REF 49 Cont .		<p>facilities for existing and new residents. We propose the following text:</p> <p style="text-align: center;"><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>Land at Fleet End Road, Warsash (26 dwellings)</u> Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water water supply and sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p style="text-align: center;"><i>Southern Water sewerage infrastructure crosses this site. This should be</i></p>	

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REF 49 Cont .		<p><i>clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>Land off Church Road, Warsash (20 dwellings)</u> Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p>	

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REF 49 Cont .		<ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>Land to the rear of 347-411 Hunts Pond Road (20 dwellings)</u></p> <p>We currently have no comments regarding development brief considerations for site land to the rear of 347-411 Hunts Pond Road.</p> <p><u>Nook Caravan Park, South of Laurel Close (24 dwellings)</u> Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p style="text-align: center;"><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p>	

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REF 49 Cont .		<p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>School Site, Heath Road (80 dwellings)</u> Insufficient sewerage capacity- proposed amendment of development brief</p> <p>We have identified that currently there is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site.</p> <p>This is not a constraint to development, provided connection to the sewerage network is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows from this site could be accommodated.</p> <p>Failure to deliver the necessary local sewerage infrastructure could lead to both new and existing customers experiencing unacceptable levels of service, for example poor drainage or foul water flooding. The planning authority has an important role to play in the delivery of sewerage infrastructure as Southern Water has limited powers to prevent new connections, even when capacity is insufficient.</p> <p>We look to you, the planning authority, to facilitate connection at the nearest point of capacity for wastewater. This will facilitate delivery of the necessary local infrastructure, and is consistent with Ofwat, the water industry's economic regulator, who takes the view that enhancements required to the local sewerage system to serve individual development sites should be funded by the development. This protects existing customers who would otherwise have to pay through increased</p>	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>general charges. We look to the development brief to reflect this approach to give early warning of this issue to potential developers.</p> <p>We propose that the following text is included in the site development brief to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p><i>There is insufficient sewerage (the underground pipes that convey wastewater to the works for treatment) capacity in the network, closest to the site, to accommodate the anticipated domestic demand from this site. The development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p><u>School Site, Heath Road (80 dwellings) contd</u> Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. 	

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REF 49 Cont .		<ul style="list-style-type: none"> • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>Windmill Grove, Portchester (24 dwellings)</u></p> <p>Southern Water infrastructure crosses the site- proposed amendment of development brief</p> <p>Southern Water sewerage infrastructure crosses this site including multiple sewers. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available.</p> <p>We therefore take the view that the site development brief should protect these facilities for existing and new residents. We propose the following text:</p> <p style="text-align: center;"><i>Southern Water sewerage infrastructure crosses this site. This should be clear of all proposed buildings and substantial tree planting. This is because access is required for future maintenance and upsizing.</i></p> <p>Also see accompanying spreadsheet, but please note:</p> <ul style="list-style-type: none"> • Where existing capacity is shown as currently available, it is not possible to reserve or guarantee future availability of this capacity- capacity is allocated on a first come first served basis. • Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of 	

ID	Respondent	Comment	Proposed Council Response
REF 49 Cont .		<p>planning conditions.</p> <ul style="list-style-type: none"> • Where infrastructure crosses the site, development design should avoid building over existing infrastructure. • Sites located adjacent to existing wastewater treatment works and/or other major wastewater treatment facilities must demonstrate adequate odour dispersion to prevent land-use conflict. <p><u>DG2- Environmental Impact</u> Support policy</p> <p>The second paragraph of Policy DG2 is supported by Southern Water because it seeks to prevent development that would lead to unacceptable deterioration in the quality and potential yield of water resources.</p> <p><u>DG3- Impact on Amenity</u> Proposed policy amendment</p> <p>Although policy DG3 makes provision for ensuring that no unacceptable adverse impact upon the amenity of existing development occurs due to new development; it fails to make provision to protect the amenity of new development proposed adjacent to existing development.</p> <p>Protection of residential amenity is important to Southern Water. Although Southern Water endeavours to operate its wastewater treatment works in accordance with best practice, unpleasant odours inevitably arise from time to time as a result of the treatment processes that occur. For this reason, sensitive development such as housing must be adequately separated from wastewater treatment works and major pumping stations, to safeguard amenity.</p> <p>We regard that this is a key issues that should be addressed through policy in order to meet paragraph 120 of the National Planning Policy Framework. We therefore propose the following additional text to policy DG3:</p> <p><i>Development proposals must ensure that sensitive development such as housing must be adequately separated from wastewater treatment works and major pumping stations, to safeguard amenity.</i></p>	

ID	Respondent	Comment	Proposed Council Response
REF 50 REF 50 Cont .	Derek Marlow on behalf of the Gauntlett Family	<p>Objection Paragraph 3.2 - 3.5 We see no reason for two distinct definitions to a line which has as its only intention the making of a definition as between urban developed land and land which is non-urban i.e. countryside. There is no need for distinction as between settlements and other urban land areas. A settlement which is substantially built-up is urban land. A settlement which is scattered and not substantially built-up would not be expected to come within an urban area definition. There should be one definition and that should be Urban Area</p> <p>Paragraph 3.6 The subject of urban edge definition was debated at the EIP into the Core Strategy. The presumption made by the council at that time was that there was no need to look outside the then defined urban edge boundary for development opportunities or to consider adjusting previous edge definitions to accommodate development.</p> <p>The inspector's view was that the council should keep an open mind as to whether there was a need for any adjustments or alterations until it had established precisely what development, outside the NCNF, was to be accommodated and whether it had sufficient land within urban areas as then defined to accommodate and deliver that ascertained amount of development during the plan period.</p> <p>The approach of the council has consistently been to start with the existing urban edge definition and to regard all past allocations within that defined area as required, viable, deliverable and developable. The remainder of the Part 2 submission seeks to justify that starting point without providing adequate evidence. And indeed by failing to follow Government advice that the preparation of a Part 2 plan is an opportunity to review all past allocations to see whether they should be carried forward.</p> <p>We consider that there has been no credible re-evaluation of sites within the urban area previously defined and that the intention of retaining the pre-existing urban area definition has driven the approach through this Part 2 Plan.</p>	<p>Noted. This has been amended and there is now a single definition which is the Defined Urban Settlement Boundaries (DUSB's) as set out in the Core Strategy.</p> <p>“Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed [1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.”</p>
		<p>Paragraph 4.9 The employment opportunities provided by Daedalus are directed at marine and aviation uses and cannot be regarded as accommodating all such user requirements. The delivery of sites within the Fareham Town Centre (see Chapter 5) is to a great</p>	<p>The Economic Development targets for the Borough do not differentiate between sectors. There is no justification for providing additional</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>extent dependent upon viability and substantial site assembly. These issues affect viability and the Plan gives no indication as to how such sites and when such sites are likely to come forward. B8 warehousing and storage sites at Daedalus suffer the inherent problem of accessibility to the regional and national road network.</p> <p>Paragraph 4.12 The allocation for employment of land at Little Park Farm has been made and continued since at least the late 1970s, through the Western Wards of Fareham Action Area Plan, the Fareham Borough Local Plan and the Fareham Borough Local Plan Review. At no stage through some 30 plus years has this land proved to be deliverable and economically viable for employment use. It is heavily constrained physically and, although in reasonable close proximity to junction 9 on M27, it is visually exposed and indirectly approached with a poor access beneath the railway line. There is no available alternative emergency exit and development may reasonably be expected to cause both adverse visual and ecological impacts. The topography of the site is not conducive to large distribution buildings or uses.</p> <p>We object to the continued allocation of Little Park Farm as a site for employment in face of equally or more suitable alternative sites which are substantially more accessible, viable and deliverable with more certainty. The Plan suggests of the 28,600 sq.m of floorspace required for B1, B2 and B8 Little Park Farm is suitable for meeting in excess of 18,000 sq.m of that requirement when that is clearly not so. We regret that the council has failed to follow Government advice to review whether this continued allocation is justified. The council 's assessment is not supportable by arguments of availability, developability, deliverability and viability.</p> <p>The text of the Plan should be amended to delete from ED2 the wording "Employment uses will be permitted.....will be resisted". The brief for Little Park Farm should be deleted in its entirety.</p>	<p>floorspace over and above the Borough's targets based on different sectors.</p> <p>It is conceded that the market for offices in the Town Centre may be limited at the current time. To that end the potential office development on sites in the Town Centre does not form part of the overall supply.</p> <p>Substantial information has been provided by the land owners of the Little Park Farm site demonstrating significant progress in resolving issues with both land assembly and access. The Council considers this site to be suitable for economic development uses and also considers the site to be deliverable within the Plan period.</p>
		<p>Paragraphs 5.35 – 5.37 The text recognises that Westbury Manor is well regarded and an asset in the town. The reduced intensity of use is not explained but may derive from the uses themselves or the management. It follows that with a management review better and fuller use might be achieved. That is no justification for suggesting that the uses should be relocated and the building put to a more market orientated commercial use. The housing of the museum in one of the oldest surviving town centre buildings is</p>	<p>The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont		<p>highly appropriate. Its relocation to a more modern alternative location would not be so conducive to enjoyment.</p> <p>We object to the specific consideration of Westbury Manor and to suggestions that it's establish community uses should be relocated as a positive aspiration of the Plan. We consider that the whole of the section 5.35 – 5.39 should be deleted together with TC8 Westbury Manor policy.</p> <p>Paragraphs 5.90 – 5.94 It is acknowledged that Russell Place is a backwater in mixed uses. There is a very significant complexity in land uses and ownerships/titles, including both freehold and leaseholds. In previous Local Plans, no bar has been set to prevent or preclude proposals for assembly and redevelopment but in more than 30 years, including some “boom years”, nothing has been brought forward. It is essential that in this Plan Part 2 aspirations should not be just that – aspiration. Government advice and guidance is that such should be available, developable, deliverable and viable. Assembly of a site suitable for development in this location is, without the use of CPO, highly doubtful. The complexities of land ownerships, the competing aspirations of individual owners of land and businesses served by and from this land; the delays in securing development; the implications of potential contamination, access, lack of infrastructure and the liability for CIL and an affordable housing quotient make this a very doubtful prospect for the scale of development suggested by the text at paragraph 9.94.</p> <p>We believe this is a “pie-in-the-sky” aspiration which has no realistic prospect of delivery within the plan period and as such should not be promoted.</p> <p>We object to the inclusion of paragraphs 5.90 – 5.94 and suggest that these be deleted along with TC16 – Russell Place.</p>	<p>Assets Policy on account of its location and its Listed Building status.</p> <p>Russell Place has been removed as a housing allocation in response to the Council's viability evidence. It remains allocated as a “town centre opportunity area” with an aspirational policy attached which seeks redevelopment, but this does not form part of the housing supply.</p>
		<p>Paragraph 7.6 The study carried out by Hampshire County Council is not yet published. Accordingly, no information is available for consideration as to what routes might be taken and thus no indications can be made on the proposals map of safeguarded areas/alignments. How can the council expect submission of support or objection when the information to make informed comment is not available? Unless and until the line of the BRT is shown on the proposals map, no valid comment/support/objection can be made. The proposals map will have to show the</p>	<p>This study has now been adopted. The Council will continue to have ongoing dialogue with Hampshire County Council who are in support of this policy.</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont		<p>entire route of the BRT within the Borough (excluding the NCNF) and show a link to that NCNF location. Until that is determined, no valid informed comments can be made.</p> <p>We are not sure what to suggest other than that the publication of this draft document making reference to route identities on a Proposals Map where no such route is yet known and no such safeguarded routes are shown on the Proposal Map is unacceptable.</p> <p>We conclude by objecting to the whole of 7.5 – 7.6 and Policy T1 until greater detail is available for consideration and comment.</p> <p>Paragraphs 7.7 – 7.14 makes no reference to other known proposals for enhancement and relief of the strategic and local road network. It is known that the highway authority intends substantial improvements to St Margaret's Lane roundabout, to the A27/Hunts Pond Road roundabout and to junctions along A27 with Brook Lane. There is no mention of these among the text. We do not understand why there is a seeming distinction between these schemes and those noted in the text, particularly the Segensworth roundabout which carries a "star" annotation. Should not a "star" be applied to St Margaret's Lane roundabout as well? If not what is the reasoning behind the distinctions made?</p> <p>Delete the whole of policy T3 as the western local distributor road is now completed.</p> <p>Amend the text of policy T4(A) to read ".....A3051 north of Curbridge."</p>	<p>The Council is in continual dialogue with HCC, as the Highways Authority, with the proviso to show on the proposals map works that have spatial implications. The "star" on Segensworth roundabout has been removed. Other proposals for highway improvements or safeguarding will only be shown where HCC can show a definitive boundary.</p>
		<p>Paragraph 8.2 Why does this draft document indicate that the policy requirement is for the delivery of 3,729 housing units in the plan period when the recently published and consulted upon Draft CIL Charging Schedule indicate perhaps 1000 more units expected?</p> <p>Paragraph 8.5 The assumptions made about the delivery of housing units within the Town Centre Opportunity Areas fails to address the criteria of deliverability and viability. There has to date been no explained viability assessment for any town centre site to ensure that figures of supply there generated will actually be delivered in the plan period. This vagueness of approach supports the overall approach of the council to seek to argue</p>	<p>The PUSH South Hampshire Strategy raised the target for new housing in the Borough. The residual target from 2011-2026 is 2,200, although this does not take into account completions from 2011-2013.</p> <p>A number of the Town Centre sites have been removed from the housing totals due to issues of viability. However, a number of the sites within the Town Centre can be demonstrated</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>against any edge-or-urban-area site allocations as a matter of principle. The scale of allocations and geographical locations will not provide the choice required by the market. The essential element (unspoken) in both this Part 2 Plan and the emerging AAP for the NCNF is that new housing in Fareham in future will almost exclusively be available only in the NCNF. That is not demonstrating choice.</p> <p>In regard to specific sites identified as comprising part of the allocation the following comments may be regarded as relevant:</p> <p>Bus Depot, Gosport Road – this proposal is substantially more potentially damaging to ecological features worthy or protection than many other sites. No viability has been undertaken to show that its allocation for 32 dwellings (including 35% affordable at nil land value = 21 units of market housing) will after due allowance for CIL contributions, decontamination, amelioration of air quality impacts etc support a value which will exceed the continued use of this site for employment.</p> <p>Citroen Garage, Wickham Road – this is an intensively developed employment site close to the town centre and on the assumed route of the BRT (with the potential limitations that might bring on site access). Aga in no viability assessment has been disclosed to demonstrate that its allocation for (maximum) 14 units (including 35% affordable at nil land value = 9 units of market housing) will after allowance for CIL contributions, decontamination, access issues and traffic noise attenuation etc support a value which exceeds its CUV.</p> <p>Former Community Facilities, Wynton Way – The identified site does not include visibility sightlines which may be required for safe access and the aligned existing access does not allow for enlargement to accommodate development with 8-10 units. Geographic location and character of the area will limit values and site/access assembly costs may combine to adversely impact on overall viability, particularly if the whole site is affordable housing. Tis site has been in local government ownership for many years, within the urban area and thus carrying a presumption for residential development and yet has never before been identified a nd brought forward. Its delivery in this plan is highly questionable.</p> <p>Land between 335 – 357 Gosport Road – This site has lain vacant for more than 50 years. It has been within the urban area definition and has remained available with a presumption in favour of development for most of that time. It has never come</p>	<p>to be developable over the Plan period and can therefore justifiably contribute towards overall housing targets.</p> <p>This site has been removed on grounds of ecology issues.</p> <p>This site has been removed due to viability concerns.</p> <p>This site remains part of the housing supply. It is likely to be taken forward as an affordable housing site.</p> <p>This site remains part of the housing supply. The land is owned by HCC and development was "held back" in order to ascertain whether</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>forward. Its accessibility from A32 is problematic and the air quality is poor. In our assessment, the prospects for this site coming forward in this plan period are low/negligible and this site should be discounted.</p> <p>East of Raley Road Land at Fleet End Road, Warsash Land off Church Road, Warsash Nook Caravan Park, South of Laurel Road</p> <p>These are all “Old Chestnuts” carried forward from the 1970s Western Wards AAP and over that 30 plus year period have never come forward. These should be the subject of review to establish whether continuation of allocation remains justified.</p> <p>118 Bridge Road, Sarisbury – this site is currently in active employment/retail use. Its allocation for up to 12 dwellings, taking account of potential contamination remediation costs and 35% affordable housing quotient leads to a conclusion that redevelopment site value will be less than CUV and the prospects for delivery during the plan period highly questionable.</p> <p>Land at Corner of Station Road and A27, Portchester – the allocation of this combined site for merely 5 units is unviable. This allocation has more to do with the recent changes in criteria for identification of Village Greens than a genuine intention to develop. The site includes a B2 commercial use which will have to be extinguished or relocated and includes local open space which may need to be relocated/re-provided elsewhere to compensate. With potential contamination costs, viability for this small number of units is highly questionable and the site thus presently undeliverable.</p> <p>Land at Stubbington Lane, Stubbington Land at Sea Lane, Stubbington It seems highly questionable to allocate two parcels which sit at the end of a commercial airfield runway where intensification of commercial activity is expected, nee being encouraged to intensify. The environmental quality of the sites are both poor and the deliverability is questionable.</p> <p>Accordingly, we object to policy H1 and the inclusion of the above highlighted sites on the grounds that they do not accord with the requirements of NPPF to</p>	<p>land would be needed for BRT. The Council has since had confirmation that the site will be taken forward in the Plan Period.</p> <p>The Council has spoken to landowners of all these sites to ascertain their prospect of being delivered during the Plan period. Following these conversations the Council is now confident that the majority of these sites can be delivered, those that have substantial delivery obstacles have been removed. Viability assessments have also been done and those to be taken forward have shown a positive land value.</p> <p>118 Bridge Road has been removed from the supply on viability grounds. The existing use value attributed to the car show room is considered to hinder viability at this time.</p> <p>This site (corner of Station Road) has been removed from the supply on viability grounds. The existing use value attributed to the employment buildings is considered to hinder viability at this time.</p> <p>These sites are owned by the HCA who have indicated that they will become available for development over the plan period. There has been no objection from the users of Daedalus to the potential for housing on this site, and given the proximity to the Solent, reflected in the value of the properties surrounding these sites, environmental quality is not considered an issue.</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>be available, developable, deliverable and viable. They should be deleted unless and until full viability testing has been undertaken to clearly demonstrate that after due allowance for all constraints, developability is proven a realistic prospect in this plan period.</p>	
		<p>Policy DG4 seeks to re-introduce a policy of the former FBLPR 2000 which has lapsed and not carried forward by the Core Strategy. Where a large allocated site delivery may be prejudiced by issues related to fragmented ownership, councils should through their endeavours to assist development encourage multiple ownerships to commercially co-operate in delivery of the identified whole. It is a matter of commercial negotiation as to whether such is achievable. It is not for planning authorities to seek to impose planning powers in a commercial situation. This view has been supported in previous planning appeal decisions.</p> <p>We object to policy DG4 in its entirety and ask that it be deleted.</p>	<p>The Council seeks to see the most efficient use of land delivered in the Borough. Development which would prejudice the delivery of a larger site is not considered to meet this objective. Therefore the Council will seek to avoid a situation that would mean wider sites are stopped from long term delivery by smaller sections being delivered independently in a prejudicial way.</p>
		<p>Paragraph 10.2 recites the wording of CS Strategic Objective SO9 of the Core Strategy. Paragraph 10.25 refers to policies CS4 – CS21 of the Core Strategy and paragraph 10.26 records various studies undertaken in recent years by the council to establish the quality and adequacy of open spaces in the borough. The Fareham Greenspace Study 2007 (2010 refresh) and The Allotments study highlights where in the borough on a ward-by-ward basis existing deficiencies are measured. The policies of this Local Plan Part 2 make no provisions for the remedy of those already identified shortfall.</p> <p>Fareham Borough has operated a policy since the early 1990s of demanding financial contributions towards open space where an existing deficiency exists. Such sums collected when first this policy was implemented were to be applied to the delivery of required open space. Latterly, the policy wording has been amended such that monies collected could be applied to qualitative improvements of existing open space in lieu of physical provision of additional open space not provided within development sites.</p> <p>This approach has served to achieve to aims: first the deficiency on a ward-by-ward basis has been allowed to become exacerbated, and second the pre-existing deficiency which formed the justification for the demand for contributions has never been made good. Accordingly until the introduction of CIL, the council will doubtless continue to follow a flawed policy and demand contributions for upgraded space.</p>	<p>The Plan now includes a “Public Open Space Allocations” policy which allocates new open space at Daedalus and Coldeast. This includes provision of allotment space.</p> <p>The Council considers that there has been qualitative improvements to a number of open spaces in the Borough which have increased their accessibility to the public. This has allowed greater use of existing spaces, whilst the Council has, and continues to create new</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>The council's own report identifies locations and wards where deficiencies exist both in various types of open space and in allotments. He council's own reports identify in excess of 300 persons awaiting allotments in the borough to enable them to become more self-sufficient. It is a matter of regret that this draft Local Plan Part 2 fails to make provision for new allotments across the borough and new open spaces across the borough to address the existing shortfalls.</p> <p>The council's own reports identify how certain shortfall could be made up to serve the communities where deficiencies exist.</p> <p>The references in paragraph 10.28 to consideration being given to use of land at Kiln Road, is outside the defined limits of this Local Plan Part 2. It falls within the AAP area for the NCNF. To refer to it here or allow its possible provision at some unspecified future date as part of an alternative matter may lead to it being double-counted and such justification is unacceptable.</p> <p>Paragraphs 10.29 and 10.30 respond to shortfalls in Stubbington/Hillhead and Western Wards but no provisions are being made In Fareham North and Wallington; Catisfield and Heathfield and elsewhere.</p> <p>Accordingly, we object to the failure of the council to identify and allocate land for open space and allotments, and to make provision for and repair existing shortfalls in the level of physical open space provision other than in locations identified at paragraphs 10.29 and 10.30.</p>	<p>spaces where possible, such as the two areas allocated in the DSP Plan.</p> <p>Spaces for allotments are now allocated at Daedalus and Coldeast.</p> <p>Whilst the land may specifically be part of the Welborne Plan it is considered that open space will be publically accessible and will therefore not only be for residents of Welborne, but for Fareham as well.</p> <p>The 2013 Greenspace Addendum identifies a small deficit of open space in Fareham North-West, but an oversupply in neighbouring Fareham North and Fareham South.</p>
		<p>LDF Site Allocations and DPD "Issues and Options" (reference for identification purposes only)</p> <p>Site 20 – Land at Standard Way – this site has been offered for employment development through a series of submissions. It is available, developable, deliverable and viable and as such should be allocated for employment development. Its allocation will entail a genuine review of the urban edge boundary but it is situate between M27 and the existing urban edge, adjoins existing employment land (Waste Transfer Station) and is opposite already built B1 uses. It has been ignored entirely through the ELR 2010 and not even been subject to criteria based assessment. It has been excluded it appears merely because its allocation would entail an urban area boundary review and because the historic and unexploited opportunity at Little Park Farm has been allowed to be carried through rather than being abandoned.</p>	<p>These sites are outside the existing urban area, which is the focal point of new development as set out in the Core Strategy (CS6). Although the DSP Plan shows a deficit in terms of overall employment floorspace, this deficit is solely in B1 (offices). These sites, due to their location and prominence scored poorly in the Employment Land Review in terms of suitability for offices. Given that there is a projected oversupply of industrial/warehouse floorspace identified in the Plan it is not considered necessary to allocate these sites for economic development</p>

ID	Respondent	Comment	Proposed Council Response
REF 50 Cont .		<p>Furthermore, it can be joined with the existing WTS for overall development of a regionally significant B8 facility in close and accessible proximity to J11 of M27.</p> <p>We ask that this site be further considered and object to its exclusion from allocation as an available employment site</p> <p>Site 323 – Military Road Depot – This site contains the existing WTS and is out with the urban area albeit it is itself a significant facility and an employment provider. This site when assess against criteria within the ELR 2010 was wrongly joined with land east beyond the old Military Road and accorded assessment rating incorrectly. This site and its two immediately adjoining parcels of available land are appropriate for allocation for B2 or B8 uses. They are available, developable, deliverable and viable. They, together with Site 20 can be used to deliver a regional facility in close proximity to junction 11 on M27. To date this site also has been excluded it appears merely because its allocation would entail an urban area boundary review and because the historic and unexploited opportunity at Little Park Farm has been allowed to be carried through rather than being abandoned.</p> <p>We ask that this site be further considered and object to its exclusion from allocation as an available employment site</p> <p>Site 324 – Land at North Wallington and Standard Way – this site has been offered for a mixed use development of employment (B1) and housing. Its development would create an entrance to the village at this point, could supplement employment opportunities in close proximity to local residents and established employment units and afford an element of housing, including affordable housing to redress the present imbalance in tenure and lack of affordable housing in Wallington, which is a distinct village settlement.</p> <p>We ask that this site be further considered and object to its exclusion from allocation as an available employment site</p> <p>Land at Military Road/Drift Road, Wallington – this site has been offered for housing together with supplemental provision of public open space (which is in some categories deficient in Wallington and North Fareham) and for provision of possible allotments. Development of housing will serve to redress the present imbalance and</p>	<p>uses.</p> <p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first</p>

ID	Respondent	Comment	Proposed Council Response
		<p>lack of affordable housing in Wallington Village and improve tenure mix. It will also aid geographical distribution of house building sites and improve market choice.</p> <p>We ask that this site be further considered and object to its exclusion from allocation as an available housing site.</p>	<p>instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>
REF 51	Colliers International on behalf of Bilsdale Properties Ltd	<p>These paragraphs set out the Core Strategy position. However, the Core Strategy Inspector under Main Issue 3 made his view on the evidence clear stating that:</p> <p>"The amended data shows that the potential surplus of Class B1 floorspace is greater than previously envisaged, while that of Class B2/B8 floorspace is less. However, in both cases, a significant potential surplus remains - namely arising from completions since the start of the Plan period, along with a number of existing commitments, notably at the Solent Business Park, Whiteley."</p> <p>This position should set the context for the policies within Chapter 4 and it is considered should be reflected more precisely in these paragraphs.</p> <p>The Core Strategy Inspector specifically required amendment to the Core strategy so that it made clear that (Paragraph 40 of the Inspectors report):</p> <p>"Notwithstanding Policy CS1's statement that existing employment areas will be safeguarded, the Council intend to review the need for certain employment designations through the forthcoming SADMPPD."</p> <p>The Inspector explicitly made this statement notwithstanding that within CS it is confirmed that floorspace targets were mer, inter alia, through:</p> <p>"Safeguarding existing employment areas."</p> <p>It is not considered that the authority have carried out a review of the type which the Inspector's report of the Council's reported intentions suggested was likely. They have referenced the 2010 Employment Land Review which was available to the Inspector, and have not carried out any further rigorous analysis of employment sites. This has a consequence for the details of development management policies which, as commented upon elsewhere, are considered to be inappropriate.</p>	<p>The South Hampshire Strategy, developed by PUSH, has increased the employment target for the Borough from 41,000sq.m (as set out in the Core Strategy) to 100,000sq.m. This was backed up by evidence in the Fareham Employment & Sites Study 2013 (set requirement of 100,100sq.m). This substantial increase means that there is no longer a significant surplus of employment floorspace.</p> <p>An updates Employment Land Review has been undertaken to support the pre-submission version of the DSP Plan. This looked at all existing sites in detail to ascertain their suitability for continued employment use and recommended a number of sites that should not be protected in the DSP Plan.</p>
REF 51			

ID	Respondent	Comment	Proposed Council Response
Cont .		At the very least, noting the potential surplus of floorspace, and particularly B1 floorspace, the policies should incorporate greater flexibility going forward and in response to the findings of annual monitoring exercises.	As previously stated, there is no longer a surplus in employment floorspace. The 2013 ELR showed a deficit in B1 office floorspace.
		<p>The policy states that:</p> <p>"Where a building or site within an existing employment area has been taken for a reasonable period of time...."</p> <p>The policy does not provide clear guidance and should provide more detail as to what "a reasonable period of time" is considered to mean. The consequence is that owners face a significant uncertainty when assessing the future of any properties falling vacant.</p>	This policy has been changed to allow for greater flexibility in terms of changes of use between economic development uses, but it also allows for redevelopment where it can be demonstrated that the existing use is no longer appropriate. The policy now requires a 12 month marketing exercise to be submitted to demonstrate it is no longer viable for its current uses.
		<p>The policy sets a blanket policy approach for alternative uses or redevelopment of buildings and sites within existing employment areas. It specifically places an expectation that any alternative use will also be for employment opportunities.</p> <p>It is suggested that this is an inflexible approach and that greater differentiation relating to different alternative uses is required.</p> <p>If a site is the subject of proposals for economic development use as defined in the NPPF, then they should, as a matter of principle, be considered to be acceptable. The exception will generally be town centre uses on any non town centre sites which will be subject policies relating to location of such uses in accordance with NPPF. There are however other uses which provide employment opportunities generate wealth or produce or generate an economic output or product. (Taken from the fuller definition provided in now withdrawn PPS4: Planning for Sustainable Economic Growth).</p> <p>It is considered that this would encourage the maintenance of sustainable economic development and could well avoid the risk of employment sites lying vacant for an unnecessarily long period which is a high probability in the context of the wording of this policy, (which expects premises to be vacant for a reasonable period of time - subject of separate objection).</p> <p>A main objective of encouraging economic development is the creation of</p>	This policy has been changed to allow for greater flexibility in terms of changes of use between economic development uses, but it also allows for redevelopment where it can be demonstrated that the existing use is no longer appropriate.

ID	Respondent	Comment	Proposed Council Response
REF 51 Cont .		<p>employment. Consequently, proposals for any form of economic development on any existing employment site or area should be considered to be acceptable without needing to pass the test of this policy, and not simply B1, B2 or B8 uses. Sustainable economic development encompasses a wider range of uses that simply those within the "B" Use Classes and these should be excluded from Policy ED1.</p>	
		<p>Policy ED1 indicates that change of use or development within employment areas for non-economic development uses will be resisted. In the context of the Core Strategy SC1 approach, this policy may be an appropriate basic principle. However, it is considered that there will always be circumstances where the site is no longer appropriate for any forms of economic development.</p> <p>The criteria in the second part of the proposed Policy ED1 would seem to be appropriate to be applied to such proposals, taken together with other more general development management policies such as those in Chapter 9.</p>	<p>This policy has been changed to allow for greater flexibility in terms of changes of use between economic development uses, but it also allows for redevelopment where it can be demonstrated that the existing use is no longer appropriate</p>
		<p>This policy refers to existing employment sites and areas as set out in Appendix B and shown on the Proposals Map.</p> <p>The sites shown to be dealt with in the Employment Land Review include an area defined as Wickam Road in the Fareham East Ward. It is considered that it is inappropriate to group three distinct areas into one employment area. The Employment Land Review refers to the Local Plan status of these areas as "Three separate Category A Employment Areas". It subsequently describes that as "A concentration of B1 office space employment along Wickham Road". This description is not accepted and it is considered that even taking the descriptions in the Employment Land Review, they are three areas of different character and they should be defined as three separate sites rather than as one employment area.</p>	<p>Noted. This has been addressed in the latest ELR and the latest DSP Plan, with the three sites now separated.</p>
REF 52	RSPB	<p>Many thanks for consulting the RSPB on the above Draft Plan. We wish to make the following comments.</p> <p>The RSPB commended the Council on their approach in the Core Strategy to the uncertainties presented by the ongoing research into the effects of increased recreational disturbance on the Solent Special Protection Areas (SPAs). In particular we welcomed the Council's clear commitment to "...adjust the rate, scale and/or distribution of housing or employment development across the Borough to respond to the findings of new evidence where appropriate, including the</p>	

ID	Respondent	Comment	Proposed Council Response
REF 52 Cont .		<p>Solent Disturbance and Mitigation Project in order to preserve the integrity of European sites", reflecting similar wording within NRM5 (Conservation and Improvement of Biodiversity) of the South East Plan.</p> <p>As the Council are aware, Phase 2 of the Solent Disturbance and Mitigation Project has now indicated that both current and future predicted disturbance levels are likely to reduce survival of a number of species of wader within the Solent SPAs, with an average of 42% of the SPA intertidal area already subject to human disturbance. While work is ongoing to test these initial results (via a peer review) and, in parallel, to determine an appropriate strategic approach to the mitigation of future impacts, it is clear that, on the basis of the precautionary principle, the initial results justify that all measures should be taken to avoid placing further pressure on the European sites. Therefore, wherever possible, planned new housing should be located away from locations offering immediate access to sensitive SPA areas.</p> <p>This is in keeping with the National Planning Policy Framework, which identifies as one of its core planning principles that <i>"Allocations of land for development should prefer land of lesser environmental value"</i>. The sequential principle to the protection is biodiversity is further embedded in the guidance, with paragraph 118 directing that <i>"if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."</i></p> <p>We are therefore extremely disappointed that a number of housing allocations are included in the Draft Plan which, due to their proximity, will place an unnecessary and, in our view, entirely avoidable pressure on either the Solent and Southampton Water SPA or the Portsmouth SPA.</p> <p>These allocations are as follows:</p> <p>ID 40: Gosport Road Bus Depot Allocated for 32 dwellings; within immediate proximity to Portsmouth Harbour SPA.</p> <p>ID 1076: Land Between 335-357 Gosport Road Allocated for 8-10 dwellings; adjacent to the Gosport Road Bus Depot site, and within 50m of Portsmouth Harbour SPA.</p>	
REF 52 Cont .			<p>The majority of sites within 500m of the SPA have now been removed from the DSP Plan. The remaining site (335-357 Gosport Road) is considered to have a minimal impact given the scale of the development proposed and distance to the SPA.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>ID 1215: Seaye House & Adjoining Commercial Properties, Lower Quay Road Allocated for 5-12 dwellings; within 30m of the Portsmouth Harbour SPA; additionally within approximately 200m of a site of importance to waders.</p> <p>ID 1948: Windmill Grove Allocated for 18-24 dwellings; within 50m of the Portsmouth Harbour SPA; additionally within close proximity to a number of sites of importance to brent geese and waders.</p> <p>Given the relatively small number of houses that would be delivered by these allocations (63–78 dwellings in total), and the considerable burden of assessment and mitigation (if indeed mitigation is possible), we consider that less damaging alternative locations could and should be sought within the Borough.</p> <p>The Habitats Regulations Assessment (HRA) screening of the Draft Plan has outlined scant potential mitigation measures to reduce recreational impacts in respect of the above allocations, largely relying upon physical screening of the developments from the SPA. In our view, such measures will be totally inadequate in deterring residents from accessing the SPA on their doorsteps.</p> <p>In the case of Windmill Grove, however, we note that the HRA actually recommends that due to ‘the number of mitigating actions required and sub optimal location of this site, <u>it may be more appropriate to de-select this site from the Site Allocation and Development Management plan.</u>’ We firmly support this recommendation, and question why, given the identification of a number of serious concerns at this stage in the assessment, the site still remains in the Draft Plan.</p> <p>We urge the Council to take a close look at each of the above allocations, and, unless it can be clearly demonstrated that (for example, due to existing access restrictions from the site to the SPA) new housing in these locations will not lead to direct recreational access to the adjacent areas of the SPA (and or its supporting sites), the allocations are removed from the Draft Plan.</p> <p>We would be pleased to meet with the Council to discuss these issues in further detail, ahead of the next round of public consultation on the Draft Plan.</p>	
REF	JPC	1.7 The role of the Development Sites and Policies Plan is to provide site specific and	

ID	Respondent	Comment	Proposed Council Response
53 REF 53 Cont .	Strategic Planning Consultants on behalf of landowner	<p>development management policies for the Borough for the plan period up to 2026. The purpose of the plan is threefold:</p> <ol style="list-style-type: none"> 1. Allocate sites principally for housing, employment and retail and other community facilities as necessary; 2. Review and designate areas in the Borough such as settlement boundaries and strategic gaps; 3. Set out Development Management policies by topic areas including Design and Town Centre Uses. <p>This document does not allocate sites in areas covered by other documents, namely New Community North of Fareham (to be covered in the Area Action Plan), Coldeast (see in Core Strategy Policy CS10) and Daedalus (Core Strategy Policy CS12).</p> <p>Comment</p> <p>The representations throughout this document are on behalf of the owners of the land identified in map 1.1. It is considered that key development sites, with specific reference to the proposed Daedalus development (co re strategy policy CS12) are reliant on securing land outside the control of the local authority. As owners of key land required to facilitate and enable sufficient access to the proposed Daedalus site, it should be made clear within the plan that no dialogue with the land owners has taken place to date. The authority is not in control of sufficient land to detail a deliverable proposal which would facilitate sufficient access to the proposed Daedalus development.</p> <p>1.10.1 The planning process requires that a plan is justified and supported by a robust and credible evidence base to show that the most appropriate strategy is chosen when considered against other reasonable alternatives. In preparing this plan, the Council has used many study materials including studies and strategies prepared by and for other organisations, including the Partnership for Urban South Hampshire. These have helped to provide a basis for the options that the Council have taken in this plan. A document5 listing all the alternative options, including the reasons why they have been discarded has been published alongside this draft of the Plan. It is available to view on the Council's website.</p>	<p>The allocation of Daedalus as a strategic employment site has already been set out in the Core Strategy. As the Highways Authority for the area, Hampshire County Council are responsible for identifying land to be reserved in the Plan for Highways purposes. Given that HCC cannot be certain of which route they wish to use the Council is unable to reserve specific land in the Plan. Therefore, the previously proposed route from Peel Common roundabout east of the existing highway has been removed from the DSP Plan.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>Comment</p> <p>Paragraph 1.10 of the plan identifies that the most appropriate strategy is chosen when considered against other reasonable alternatives. As land owners, representations were submitted to the core strategy process which identified the safeguarded transport route (map 1.2) was, and is deliverable. The safeguarded transport route has not been tested or modelled as part of the core strategy process. It is considered that without testing viable options 5 for securing appropriate transport measures involving Newgate Lane, the plan cannot be considered robust.</p> <p>1.18 Your views are an important part of the process for creating the final Development Sites and Policies Plan. The involvement of the community is essential to achieve local ownership and legitimacy for the policies that will shape the future distribution of land uses and development in the area. It will enable informed decisions that can best suit the needs of the community as a whole. Comments are invited to include:</p> <p>Any sites that may have been missed and what these could be used for;</p> <p>Any development needs that may have been missed and where these could be located; What the appropriate uses of the identified sites may be;</p> <p>Any sites that are inappropriate and why.</p> <p>Comment</p> <p>As landowners, the representations seek to identify an opportunity to deliver key infrastructure which has overlooked to date.</p>	<p>As the Highways Authority for the area, Hampshire County Council is responsible for identifying land to be reserved in the Plan for Highways purposes. Through the Core Strategy Fareham Borough Council has identified proposed levels of development throughout the Borough. FBC has been in continual dialogue with HCC about their future plans and requirements for land in the Borough. They did not object to the level of development proposed in the Core Strategy (which included the allocation of Daedalus) and have not objected the allocated sites proposed in the DSP Plan. It is not considered the role of FBC to model transport options.</p>
		<p>Presumption in Favour of Sustainable Development</p> <p>At the heart of government planning policy is the presumption in favour of sustainable development. The policies contained within this Local Plan will follow the approach of the presumption in favour of sustainable development as set out in the NPPF. Proposals that are sustainable and which accord with the policies in the NPPF and this Local Plan will be approved without delay</p>	

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>SD1 Sustainable Development</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>Specific policies in that Framework indicate that development should be restricted.</p> <p>Comment</p> <p>In principle the policy is supported, however it is felt the council have not taken a positive approach to objectively addressing fundamental existing transport issues, with particular reference to the proposed Daedalus development. The transport network between Gosport, Stubbington and Lee on Solent, Fareham and the M27 is already compromised. Developments such as Daedalus will place a significant additional strain on the network, it is considered the current transport plans are indeciduate. It is considered without addressing the transport network, the proposed development plan is unsustainable.</p> <p>The proposal to remove the safeguarded transport route without appropriate testing is deemed inappropriate. Gosport plan to add 2500 additional dwellings across their plan period to 2016, Fareham borough council proposal to remove a strategic transport corridor without appropriate cross border consultation is flawed. The effects</p>	<p>As the Highways Authority for the area, Hampshire County Council is responsible for identifying land to be reserved in the Plan for Highways purposes. Through the Core Strategy Fareham Borough Council has identified proposed levels of development throughout the Borough. FBC has been in continual dialogue with HCC about their future plans and requirements for land in the Borough. They did not objected to the level of development proposed in the Core Strategy (which included the allocation of Daedalus) and have not objected the allocated sites</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>of the proposed Daedalus development, or the planned 2500 units in Gosport have not been appropriately factored into the authorities transport measures. The resultant development will have a significant negative impact on the existing transport network. It is considered both Fareham and Gosport's plans involving housing and the Daedalus site are not currently sustainable.</p> <p>Strategic Gaps</p> <p>Allocation land east of Newgate Lane in the strategic gap on the grounds:</p> <p>There is no mention of strategic gaps in the NPPF therefore this is no longer a policy option from April 2013, making this document non NPPF compliant.</p> <p>The Core Strategy Inspector stated that the strategic gap should only include such land as was absolutely necessary to prevent coalescence of settlements. The gap identified as 'strategic' between Fareham and Stubbington varies significantly in size and merely represents the gap that currently exists.</p> <p>Fareham and Gosport already join and the land east of Newgate Lane has very good public transport connections (bus and rapid transit) making this a very sustainable location for development so there is no justification in seeking to include this land in the 'strategic' gap.</p>	<p>proposed in the DSP Plan. It is not considered the role of FBC to model transport options.</p> <p>Including a policy on an issue that is not specifically mentioned in the NPPF is not considered, on its own, to make the Plan non-compliant.</p> <p>Fareham Borough Council has undertaken a review of the Strategic Gaps (David Hares Landscape Architecture) to ascertain that the proposed gaps were serving the purpose of preventing coalescence. To this end, a section of the Strategic Gap south of Warsash has been removed as it serves no purpose in this regard. The section east of Newgate Lane is protected to prevent coalescence of Stubbington and Fareham.</p>
		<p>Although 20,000sq.m of this floorspace target has been provided since the start of the plan period in 2006, almost 10,000sq.m of B1/B2/B8 floorspace has been lost to other uses, requiring a residual target of around 30,000sq.m to be provided. This remainder is expected to be provided by allocating appropriate sites/areas, whilst protecting existing sites/areas. The strategic employment allocation at Daedalus (see Core Strategy Policy CS12) will contribute significantly to the overall employment target, as will the other allocations contained in policy ED2 and sites in the Fareham Town Centre (see chapter 5).</p> <p>Policy ED1 provides protection to all sites listed in Appendix B. This approach clarifies that all sites contribute towards economic growth and should be protected in the same way.</p>	<p>The allocation of Daedalus as a strategic employment site has already been set out in the Core Strategy. As the Highways Authority for the area, Hampshire County Council are responsible for identifying land to be reserved in the Plan for Highways purposes. Given that HCC cannot be certain of which route they wish to use the Council is unable to reserve specific land in the Plan. Therefore, the previously proposed route from Peel Common roundabout east of the existing highway has been removed from the DSP Plan.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>Comment</p> <p>Core Strategy Policy CS12 identifies Daedalus as contributing significantly to the overall employment target. The current access would be via Newgate Lane, a heavily trafficked single lane transport route. The proposed transport solutions are very limited and cannot be delivered by the authority in isolation. Third party land is intrinsic to achieving any improvements to the transport network. The options considered were very limited and did not involve modelling the proposed safeguarded transport route. The authority cannot demonstrate they have looked all alternative options for improving the transport network, two such options which are have not been considered and could be delivered are identified within these representations.</p> <p>ED1 Existing Employment Sites and Areas</p> <p>The Existing Employment Sites and Areas set out in Appendix B and shown on the Proposals Map shall be protected for B1, B2 or B8 uses.</p> <p><i>Redevelopment, extensions and intensification in these areas that would result in additional floorspace for B1, B2 or B8 uses will be supported provided that:</i></p> <ul style="list-style-type: none"> · it would not have unacceptable amenity or traffic implications; · an appropriate size and range of units is provided (where appropriate); and · appropriate levels of parking are provided. <p>Where a building or site within an existing employment area has been vacant for a reasonable period of time alternative uses that contribute towards economic development will be permitted where: It can be demonstrated that it is no longer suitable or viable for B1, B2 or B8 uses and where the site is vacant, there is evidence of active marketing for a reasonable period; and</p> <p>The proposed use is expected to provide employment opportunities of similar quality and quantity as those which previously existed.</p> <p>Changes of use or redevelopment within the employment areas which would result in a loss of floorspace for economic development uses will be resisted.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>Comment</p> <p>It is considered that the allocation of the Daedalus site it would have significant unacceptable traffic implications. The current measures identified by the authority would not solve the existing problems, without further traffic generated by the Deadalus site. The traffic modelling to date does not adequately factor in any additional traffic which will be generated by further developments in Lee on Solent or Gosport across their plan periods.</p>	
		<p>Transport and Access</p> <p>T1 Bus Rapid Transit</p> <p>T2 Improvements to the Strategic Road Network</p> <p>T3 Improvements to the Distributor Road Network</p> <p>T4 Access to Whiteley</p> <p>T5 Parking</p> <p>T6 New Community North of Fareham</p> <p>7.1 Good access into and within the Borough and Fareham town centre is essential if a vibrant economy, that will support future growth, is to be maintained. The transport networks should support the development of the Borough in terms of providing fast, safe and easy access to all areas, including employment and retail centres, the cultural offer, night life and residential areas. In order for the future of the Borough and, particularly, the town centre to be sustainable, walking, cycling and public transport choices should be made available without unduly compromising access by car.</p> <p>Comment</p> <p>We support the notion of good access within the borough being essential to a vibrant economy, however the current plan are predicated on modelling that overlooks a ll the viable alternatives. It cannot be considered appropriate for 10 the authority to seek good access without sufficiently testing all viable options.</p> <p>A32 Gosport Road</p> <p>7.8 The A32 is one of the most congested links in the Borough, with high flows present inter-peak as well as during the morning and evening peaks. This link</p>	<p>As the Highways Authority for the area, Hampshire County Council is responsible for identifying land to be reserved in the Plan for Highways purposes. Through the Core Strategy Fareham Borough Council has identified proposed levels of development throughout the Borough. FBC has been in continual dialogue with HCC about their future plans and requirements for land in the Borough. They did not objected to the level of development proposed in the Core Strategy (which included the allocation of Daedalus) and have not objected the allocated sites proposed in the DSP Plan. It is not considered the role of FBC to model transport options.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>can therefore be thought of as at capacity and further increases in traffic flows cannot physically be accommodated during peak periods resulting in a lengthening or spreading of the peak when traffic flows increase. This has an adverse impact on air quality and the two AQMAs are both close to this link. There are no highway improvements planned by Hampshire County Council. It must therefore be noted that this link is very sensitive to development.</p> <p>Comment</p> <p>With the A32 at capacity, increased levels of traffic will be directed to Newgate Lane. Coupled with Gosports target of 2500 additional units, the proposed transport plan of limited improvements is flawed and unsustainable</p> <p>Newgate Lane</p> <p>7.9 Planned improvements to Newgate Lane as part of the development of the Daedalus site will play an important role in relieving congestion on the A32 within Fareham Borough and will be vital in mitigating the effects of the proposed development. Should development of the site come forward without such improvements taking place it is likely to have a significant adverse effect on traffic within Fareham, including the town centre.</p> <p>Comment</p> <p>The Council has not considered alternatives to this road widening that would provide betterment. Specifically the council has not considered allowing development to the east of newgate Lane to enable provision of the originally safeguarded route. This is not a good long term solution and not a good use of public funds.</p> <p>The land is not in the control of the local authority, it is clear limited testing has been carried out so the authority have no powers to secure the land, therefore the planned improvements are not achievable.</p> <p>Gosport-Fareham Link Road and Western Approach to Gosport</p> <p>7.14 These are large schemes that may be challenging to implement and have not yet been worked up in detail, therefore no indication of 11 land safeguarding for them</p>	<p>HCC are the Highways Authority and are in discussion with both Gosport and Fareham Borough Council's. They are aware of the quantum of development being proposed in both Local Plan's and are expected to respond accordingly. There can be no requirement for Gosport and Fareham BC's to consult each other on highways issues as they are not the authority in this area.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>is made on the Proposals Map. However, as they still form part of HCC's longer term aspirations for the Borough it is felt that reference should be made to them as it is possible that they will come forward in the future.</p> <p>T2 Improvements to the Strategic Road Network</p> <p>The parcels of land, as shown on the Proposals Map, are safeguarded for the following proposals which will improve and maintain the effectiveness of the Strategic Road Network:</p> <p>(A) A27 Dualling; (B) B3385 Newgate Lane, Fort Fareham - Peel Common;</p> <p>Comment</p> <p>Improving the transport network is supported, however appropriate testing of all viable options must be carried out to inform the most appropriate and successful transport solution. Go sport's proposed allocation of 2500 units, the traffic generated from Daedalus and the proposed housing allocations in Fareham must be appropriately modelled. Failure to do so will result in unsustainable plans for both local authorities.</p> <p>Two deliverable options which have not been considered or modelled are identified below:</p> <p>Option 1 : Relief Road</p> <p>A full relief road along the proposed safeguarded transport route, funded by development. The relief Road would provide an additional link road, diverting traffic away from the unsuitable Newgate Lane. Enabling development could fund the works, ensuring public monies are spent on more appropriate measures elsewhere in the borough.</p> <p>Option 2 : Increased Lanes along Newgate Lane</p> <p>Providing the land to install additional lanes from Peel Roundabout to Longfield Avenue/ Newgate lane Roundabout. The proposed route could be funded through</p>	<p>The Council has been in continual dialogue with HCC regarding the land considered necessary for improvements and/or safeguarded for future works. Where HCC has been unable to show definitively the boundary of proposed works the Council cannot show these on the proposals map.</p> <p>It is not the role of Fareham Borough Council to consider options for highway improvement. This work will be done by HCC with the necessary safeguarding of land passed down for Fareham Borough Council to include in the relevant plan.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>development to the East of Newgate Lane, releasing sufficient land and monies to appropriately deal with the transport network.</p> <p>Gosport Local Plan</p> <p>Access to Gosport – Peel Common:</p> <p>10.51 Details of the scheme have yet to be decided but improvements to the Peel Common roundabout, at the junction of B3385 with B3334, are likely to include traffic control measures and road widening. The LTP notes that the scheme aims to improve journey time reliability rather than improving queue length. However measures are necessary to address substantial queuing arising from recent housing development in Lee on the Solent and the proposed redevelopment of Daedalus as a mixed use site. Further improvements are required to Newgate Lane north of the junction to provide a route of a more appropriate standard, and to better accommodate buses, cyclists and goods vehicles</p> <p>Comment</p> <p>The proposal is supported, however the plan is unsustainable as the land is outside the authorities control. It is evident allocations have been proposed without appropriate in frastructure measures in place to facilitate them.</p> <p>Access to Gosport – Newgate Lane junctions with Longfield Avenue and Speedfield:</p> <p>10.50 This scheme involves replacing the existing neighbouring small roundabouts with signalised junctions, thereby giving priority to traffic on Newgate Lane. Proposals include improved pedestrian and cycle crossing facilities and bus infrastructure to improve access to the adjoining business and commercial</p> <p>Comment</p> <p>Further evidence that cross border consultation has been insufficient in determining how allocations and infrastructure to support them will be achieved. As the infrastructure is not in place, or any sort of detailed plans and delivery mechanism, the plans must be deemed unsustainable.</p>	<p>Fareham Borough Council is unable to comment on the content of the Gosport Local Plan.</p> <p>Fareham and Gosport Borough Councils are in continual dialogue with HCC who, as the highways authority, have control of transport issues.</p>

ID	Respondent	Comment	Proposed Council Response
REF 53 Cont .		<p>8.7 The above sources of housing land will allow Fareham to demonstrate a sufficient supply of deliverable sites to meet its five year housing requirement. At present, Fareham Borough is unable to demonstrate a sufficient supply of developable sites for years 6-10 and for years 11-14. However, projections suggest that significant over-delivery in the early stages of the plan period will ensure that Fareham will be capable of meeting its overall housing requirements across the plan period³⁶. A housing trajectory for Fareham Borough, which is based on the most up-to-date information available to the Council, is set out in Appendix G of this Plan. The trajectory takes into account NPPF requirements to apply an additional 5% buffer to the deliverable housing land supply which has been moved forward from later in the plan period.</p> <p>8.13 The housing supply that is needed to ensure that the Borough can meet its requirement consists of: a minimum of 180 dwellings on sites allocated through the Core Strategy at Coldeast; 516 dwellings from sites with planning permission where development is currently in progress³⁹; 138 dwellings on sites with planning permission where no material start has been made; between 370 - 432 dwellings on housing allocations rolled forward from the Local Plan Review (2000); between 337 - 600 dwellings on new allocations⁴⁰; 420 dwellings delivered through windfall sites and; 2,276 dwellings already delivered through past completions. The total from these various sources shows a surplus of between 36 and 361 dwellings which is adequate to enable Fareham Borough to meet its housing requirement (see Table 2 below).</p> <p>Comment</p> <p>Table 1.1 details the sites deemed as deliverable, each site has been reviewed and the main issues with delivery are highlighted. Significant work on each will be required to bring forward the proposed developments. There is a clear over reliance on previously allocated sites. Given the current housing market shift from high density to low density family housing, the densities identified on many of the sites are considered to be too high and undeliverable in the current market. An average density of 30 units per hectare has been applied to the sites in table 1.1, which would reflect current market needs.</p> <p>When applying an average density of 30 units per hectare, and taking into account the identified delivery issues with each site, it is considered that 459 units of the</p>	<p>The Council has removed a number of sites from the DSP Plan since the draft stage due to viability and deliverability. The Council has contacted all landowners of all sites to be included and considers that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore</p>

ID	Respondent	Comment	Proposed Council Response																
REF 53 Cont .		<p>potential 578 (allocated 2000 plan & current permissions without a start) are potentially undeliverable.</p> <p>There is a clear over reliance on previously allocated sites. The authority offers no justification as to why the sites would come forward, when they could not be delivered during the considerable housing boom up to 2008. It is highly unlikely these sites will come forward in a depressed market, not withstanding the additional issues with each site identified in table 1 .1. The authority is relying on potentially 420 dwellings to be delivered on sites which have failed to materialise since the 2000 review.</p> <p>Up to 4 hectares of existing employment land would be lost as part of the proposed housing delivery. The sites could deliver around 108 units, however the loss of employment land is at odds with current local plan policy. The sites are in active use, or could be alerted to accommodate a new use, which would suggest it would be extremely difficult to demonstrate they are not required and a change of use would be appropriate.</p> <p>Major contributing sites, such as Peters Road, Raley Road, Nook Caravan Park and Fleet End road have considerable land ownership issues which are out of the control of the authority. There is an over dependence on solving long standing ownership issues on these sites, which to date have not been achievable. The plan offers no additional information as to why and how these sites would come forward.</p> <p>Table 1.1 : Housing Assessment</p> <table border="1" data-bbox="465 1002 1070 1374"> <thead> <tr> <th>Site</th> <th>Si ze</th> <th>Key Deliverability Issue</th> <th>30 units per HA</th> </tr> </thead> <tbody> <tr> <td>Hinton Hotel</td> <td>0.82</td> <td>Loss of Employment Land</td> <td>24.6</td> </tr> <tr> <td>Bus Depot</td> <td>1.49</td> <td>Loss of Employment Land</td> <td>30</td> </tr> <tr> <td>Croft House</td> <td>0.32</td> <td>Loss of Employment Land</td> <td>9.6</td> </tr> </tbody> </table>	Site	Si ze	Key Deliverability Issue	30 units per HA	Hinton Hotel	0.82	Loss of Employment Land	24.6	Bus Depot	1.49	Loss of Employment Land	30	Croft House	0.32	Loss of Employment Land	9.6	<p>given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites in the countryside.</p> <p>Previously allocated employment sites (Gosport Road bus depot, 118 Bridge Road, Citroen Garage, Windmill Grove and Seaye House) have all been removed due to their existing land values.</p> <p>Peters Road has an outline permission for over 300 units and has a subsequent detailed permission for 49 units on one section.</p> <p>Multiple land ownership can be an issue in terms of deliverability, however all landowners of all sections of all sites have been contacted to ascertain the likelihood of development coming forward. Where the Council is not convinced that a suitable solution can be found sites have not been include, or potential capacities of certain sites reduced.</p> <p>Hinton Holtel now has permission for residential. Not considered to be employment land.</p> <p>Bus Depot site removed from supply due to viability and flood concerns.</p>
Site	Si ze	Key Deliverability Issue	30 units per HA																
Hinton Hotel	0.82	Loss of Employment Land	24.6																
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ID	Respondent	Comment				Proposed Council Response
REF 53 Cont		Citeron Garage	0. 3 4	Loss of Employment Land	10.2	<p>Croft House is a care home and is considered to be surplus to the needs of HCC (landowners). Not considered an “employment site”</p> <p>Citroen Garage removed from supply due to viability.</p> <p>BRT issues on Gosport Road resolved as HCC have indicated that site is surplus to requirements.</p> <p>Seaye House site removed from supply due to viability.</p> <p>Collingwood House is under construction for residential dwellings.</p> <p>Peters Road site has outline permission and a full permission for 49 units on part. Further applications have been received showing that land ownership is not hindering development.</p> <p>Discussion with two landowners at Raley Road have shown that the site can be delivered over the plan period.</p> <p>Whilst there is uncertainty over the ability to deliver the Fleet End Road site comprehensively some sections can be accessed and so smaller site capacity included in the Plan.</p> <p>No issue with access and ecology can be mitigated at Church Road.</p>
		Wyton Way	0. 4 3	Loss of Community Facilities & Access	12.9	
		Gosport Road	0. 2 3	Undeliverable due to BRT	6.9	
		Seaye House	0. 1 2	Loss of Employment Land	3.6	
		Collingwo od House	0. 2 8	Financially not viable	8.4	
		Peters Road	5. 1 1	Undeliverable due to land ownership and piecemeal approach	153.3	
		Raley Road	2. 1	Undeliverable due to land ownership and piecemeal approach. Not delivered in over 12 years	63	
		Fleet End Road	0. 7 9	Undeliverable due to land ownership-p and piecemeal approach. Not delivered in over 12 years	23.7	
		Church Road	0. 9	Undeliverable due to ecology and access	27	
Hunts Pond Road	1. 3 5	Undeliverable due to ecology and access	40.5			

ID	Respondent	Comment	Proposed Council Response				
REF 53 Cont .		<table border="1"> <tr> <td data-bbox="465 231 622 410">Nook Caravan Park</td> <td data-bbox="622 231 678 410">0.68</td> <td data-bbox="678 231 949 410">Undeliverable due to land ownership and piecemeal approach. Not delivered in over 12 years</td> <td data-bbox="949 231 1070 410">20.4</td> </tr> </table>	Nook Caravan Park	0.68	Undeliverable due to land ownership and piecemeal approach. Not delivered in over 12 years	20.4	<p>EA have not raised issues in terms of ecology, site is accessible through existing Hunts Pond Road scheme and from main road.</p> <p>Half of Nook Caravan Park site now removed due to multi land ownership and lack of agreement. Bottom half in single ownership who is keen to bring site forward.</p> <p>Bridge Road site removed from supply due to viability.</p> <p>Windmill Grove site removed from supply due to viability and flood risk.</p> <p>The Council is confident that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites in outside the urban settlement boundaries.</p>
		Nook Caravan Park	0.68	Undeliverable due to land ownership and piecemeal approach. Not delivered in over 12 years	20.4		
		<table border="1"> <tr> <td data-bbox="465 422 622 505">Bridge Road</td> <td data-bbox="622 422 678 505">0.26</td> <td data-bbox="678 422 949 505">Loss of Employment Land</td> <td data-bbox="949 422 1070 505">7.8</td> </tr> </table>	Bridge Road	0.26	Loss of Employment Land	7.8	
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		<table border="1"> <tr> <td data-bbox="465 518 622 601">Windmill Hill Grove</td> <td data-bbox="622 518 678 601">0.58</td> <td data-bbox="678 518 949 601">Loss of Employment Land</td> <td data-bbox="949 518 1070 601">17.4</td> </tr> </table>	Windmill Hill Grove	0.58	Loss of Employment Land	17.4	
Windmill Hill Grove	0.58	Loss of Employment Land	17.4				
<table border="1"> <tr> <td data-bbox="465 614 622 697"></td> <td data-bbox="622 614 678 697">15.8</td> <td data-bbox="678 614 949 697"></td> <td data-bbox="949 614 1070 697">459.3</td> </tr> </table>		15.8		459.3			
	15.8		459.3				
<p>New Allocation</p> <p>A new allocation should be considered to alleviate the identified gap in delivery in years 6 – 10. The allocation would enable significant improvements to the Newgate Lane / Gosport transport network. The allocation would enable the authority to robustly defend the housing delivery numbers, without over reliance on undeliverable schemes from previous allocations. Under the new guidance of the NPPF, robustly defending the housing figures will be key in stopping undesirable sites coming forward. In line with the NPPF it is considered that the proposed scheme is ‘Sustainable’.</p> <p>Given the identified issues of land control, existing congestion and the need to identify a suitable solution for the Daedalus development, the proposed development could deliver both required housing units and transport solutions. Given Gosport’s intended additional 2500 units across their plan period, and the fact that the A27 is recognised as at capacity, securing an adequate transport link along Broom Way and Newgate Lane will be essential to the long term viability of both local authorities plans.</p> <p>Map 1.5 identifies a potential layout which could accommodate up to 550 units, open</p>							

ID	Respondent	Comment	Proposed Council Response
		<p>space, community facilities and a proposed relief road. The development would fund the relief road, providing key infrastructure requirements for both local authorities. The housing numbers would ensure the authority can plug the gap identified in housing supply from years 6 – 10 and onwards.</p> <p>The relief road follows the safeguarded transport route (Map 1.6). An alternative smaller scheme could be delivered in line with map 1.7, however demonstrating that the transport solution is the optimum long term solution would be key.</p> <p>It is recommended that the authority seeks to enter into dialogue with the landowners. Legal advice is clear, due to the lack of dialogue and appropriate testing carried out to date, the local authority would have no mechanism to secure the land required to implement any transport measures along Newgate lane.</p> <p>Without appropriate transport measures in place to cope with planned developments, or robust housing land supply it is considered that the current plan is unsustainable.</p>	
REF 54	Robert Tutton Town Planning Consultants Ltd on behalf of Mr G. Moyse	<p>The Proposals Map of the Fareham Borough Local Plan Review designated 1.2 hectares of land at the eastern end of the Segensworth East employment area (immediately to the west of Whiteley Lane) for 'Open Storage Uses' (Policy E5) but the site came to be developed with traditional industrial buildings. Policy CS1 of the adopted Core Strategy tells one that 'Employment sites and areas will be reviewed through the Site Allocations and Development Management Development Plan Document' but neither the 'Solent Business Park, Phase 2' nor the 'Little Park Farm' Employment Allocations make specific provision for open storage uses, which cannot compete on equal commercial terms with covered B1, B2 or B8 uses. FBLPR Policy E5 identified 1.7 hectares for the purpose but 70% of the allocation was lost to traditional industry. This irregular-shaped area of land enjoys ready access to the strategic road network and adjoins the Fort Wallington Employment Area. It is submitted that this site should be included within the Urban Area Boundary and designated 'Open Storage Uses' as a partial replacement for the area (1.2 hectares) that was lost for that purpose at Segensworth East.</p>	<p>Whilst open storage uses are considered to be an economic development use, there is no requirement to specifically plan for them in the NPPF or in the revised South Hampshire strategy. It is noted that previously allocated "open storage" sites have been redeveloped for other purposes. However, the Council is confident that where a market exists for a certain use proposals will come forward. It is also considered that part of Little Park Farm may come forward for open storage development. Therefore it is not considered necessary to allocated specific sites outside of the urban area boundary to accommodate this type of use.</p>
REF 55	Robert Tutton Town Planning	<p>Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A</p>	<p>"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This</p>

ID	Respondent	Comment	Proposed Council Response
	Consultants Ltd on behalf of Ms M. Dwyer	boundary that does not meet that test is likely to be later found to be 'unsound'. Residential development stands on both sides of Botley Road and it has all the characteristics of a low-density suburb rather than countryside. Indeed, the openness of countryside can only be appreciated beyond the ends of the gardens of the residences that stand to the west of Botley road. The time has come to recognise that both sides of Botley Road now form part of the Urban Area of Burr ridge, by demarcating the Urban Area Boundary so as to include the west side of Botley Road.	<p>approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p>
REF 56	Robert Tutton Town Planning Consultants Ltd on behalf of Mr G. Podre	Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. The Urban Area Boundary does not respect '...physical boundaries that are readily recognisable' on the north side of Funtley village; on the contrary, it passes through the Social Club building and site and consequently cuts off the irregular-shaped area of land that lies to the north of Nos.86, 86a and 86b Funtley Road. This area of land is very unkempt and dilapidated and detracts from the character and appearance of the local 'Countryside' that it ostensibly forms part; indeed, the site is more unkempt and dilapidated than it was a decade ago and its inclusion within the Countryside area has frustrated the landowners to achieve a viable redevelopment that would enhance the character of its surroundings. The time has come to rationalise the Urban Area Boundary in this vicinity in the manner proposed.	<p>"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p>
REF 57	Robert Tutton Town Planning Consultants	Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. The	"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF,

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REF 57 Cont .	Ltd on behalf of Mr & Mrs M. Godwin	local planning authority has had difficulty for over three decades in formulating a definitive and meaningful approach to the control of development in this vicinity. the Western Wards of Fareham Action Area Plan showed the 'Substantial Built Up Area' extending 200 metres to the west of Barnes Lane and, despite there having been several grants of permission for permission for development (FBC5894/8 is one example), the Fareham Borough Local Plan reflected a view that the 'Urban Area' should terminate at Bramble Lane. The review reiterated that unsatisfactory and arbitrary arrangement. Residential development stands on both sides of Bramble Lane and Mulberry Lane and the character of the locality may perhaps be best described as 'developed countryside'. the 'Urban Area Boundary' passes arbitrarily past and through residential curtilages and there is no readily recognisable 'edge' to the urban area - beyond which conservation should outweigh development. It is submitted that the 'edge' should be defined to the southwest of Mulberry Lane and the west of Bramble Lane, in the manner shown; no harm would be caused by the acceptance of residential development to the north and east of the suggested boundary and conservation 'Countryside' policies would be more clearly relevant for open land to the west.	which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]". Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."
REF 58	Robert Tutton Town Planning Consultants Ltd on behalf of Mr & Mrs A. Trimmings	Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. To the northwest of Fareham Park Road, the 'Urban Area Boundary' passes arbitrarily through the large field that lies to the southwest of Hope Lodge; there is no readily recognisable physical boundary, not even a fence-line to indicate why the boundary is shown in that position. Housing Allocation Site 1249 simply follows that arbitrary boundary. While one welcomes recognition that this land is capable of accepting residential development, blind adherence to the arbitrary Urban Area fails to recognise and realise its potential and undermines the 'Capacity Rationale' set down in Local Plan Part 2. Pursuant to the principal set down in paragraph 3.4, it is submitted that a defensible boundary should be created with a landscaping belt outside the northwest and southwest boundaries of an allocation for fourteen dwellings instead of seven. Fourteen dwellings on a site would represent a net residential density of 18.2dph - similar to the 17dph advocated by the 'Capacity Rationale' as '..somewhere between the low density, executive houses to the northeast and the more standard development to the south'. At such time as the 'Older person's Housing Strategy for Fareham' (promised by paragraph 4.24 of the	"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]". Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."

ID	Respondent	Comment	Proposed Council Response
		Core Strategy) is made available, it may be that this site would be seen to be suitably developed as a modest 'retirement village'. It is submitted that the 'Urban Area Boundary' and Housing Allocation Site 1249 should be extended to facilitate the achievement of fourteen dwellings on land to the southwest of Hope Lodge.	
REF 59	Robert Tutton Town Planning Consultants Ltd	Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. To the north of Bridge Road, Sarisbury Green, the Proposals Map of the Fareham Borough Local Plan review presently shows the 'Urban Area' boundary following the south side of Chapel Lane and Spring Road, when in fact both sides of those roads are built up to a similar degree, as a result of infill development in recent years (eg P/07/0013/FP). The edge of the 'Countryside' is actually the end of the gardens that front Chapel Road, Glen Road and Spring Road, rather than the road frontage. The integrity and effectiveness of 'Countryside' policy is lost when the local planning authority seeks to apply it to areas which are, to all intents and purposes, already built-up. The 'Urban Area' boundary should be extended to include north side of Chapel Road Spring Road and return along Glen Road.	<p>“Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.”</p>
REF 60	Robert Tutton Town Planning Consultants Ltd on behalf of Mr R. Lundbech	Paragraph 85 of the National Planning Policy framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. The Proposals Map of the Fareham Borough Local Plan Review shows the 'Urban Area' boundary arbitrarily bisecting the rectangle of land that lies to the west of Anchor House, Wicor Path, Portchester. The northern part of Mr Lundbech's is shown within the Urban area and the southern part within countryside. There is a physical boundary that is readily recognisable and likely to be permanent - the south boundary of the land west of Anchor House. No issue is taken with the west boundary, beyond which lies the cemetery. To be consistent with the 'Urban Area' status of land to the north or Wicor Path, the southern half of Mr Lundbech's % 3Band should be shown with the Urban Area.	<p>“Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's</p>

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			development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.”
REF 61	Private Individual	<p>It was surprising to see just how many more houses are being earmarked in the Borough - along with the North of Fareham Development - with no real improvement to infrastructure. The town will become a 'no-go area' as it is already in the rush hours. Meanwhile many social places and buildings are having severe cut backs. Also the pressure this puts on hospitals and surgeries etc. The need for new housing is not the sole responsibility of the Borough of Fareham and the limit has now been reached! Thankfully the policy has marked the Conservation Areas sympathetically - and we are lucky enough to have a good number spaced around the Borough but we will all have to Police this well if we are to avoid new houses creeping up to the boundaries as i.e. Warsash Strawberry Fields. It was useful to view all the information at the exhibition which I thought was very well presented. Thankyou.</p>	<p>Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network.</p>
REF 62	Southern Planning Practice on behalf of Mr & Mrs Sibley	<p>The Core Strategy in 5.146 commits the council to reviewing the settlement boundaries which were established under CS14 Development Outside Settlements. The Development Sites and Policies Document (DSPD)claims at 3.1 to direct growth to the most sustainable locations and says this will be done by making settlement boundaries. In para 3.6, recognising the Core Strategy requirement DSPD states that it has reviewed the existing boundaries but in the final sentence states that there is no need for amendment because adequate ground has been found within existing settlement boundaries. It appears to me that there has been no attempt to evaluate existing settlement boundaries in relation to sustainability nor to look at other locations outside existing boundaries to see whether they are more sustainable than land allocated for development. In particular, previously developed land outside settlement boundaries has not been identified and considered.</p> <p>The failure to amend the boundaries does not tie in with the evidence base. In the Sustainability Appraisal scoping report of May 2012, some areas and in particular the “Segensworth corridor” is identified as an urban feature and not included in the rural landscape see figure 15.1 and ref 66. Moreover, the Segensworth corridor is not identified as having any special urban character.</p>	<p>“Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough’s development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.”</p>
REF		It follows that the undeveloped land within the Segensworth corridor should be	

ID	Respondent	Comment	Proposed Council Response
62 Cont .		<p>included within the settlement boundary as part of the urban fabric and should not be excluded from it. It is not countryside.</p> <p>The land shown on the attached plan should be included within the settlement boundary and zoned for urban uses. It is surrounded by a substantial urban area (Locks Heath Park, Segensworth and Titchfield Common, with Whiteley to the north of A27 the western wards).</p> <ul style="list-style-type: none"> • The land has no economic, social or environmental function. • It is a focal point within the emerging urban fabric, is blighted by long term neglect by the Local Planning Authority but has been harmed by its policies and decisions on surrounds land. • The land serves no function as a gap and is not designated as one. It does not separate settlements with any distinctive character • There is no public access to any part of the land • Accessible to a large population • Access to the full range of facilities within reasonable distance • Accessible by a range of transport modes (bus, cycling, foot and British Rail) • Is capable of use for a wide range of urban uses as follows:- <ul style="list-style-type: none"> a. Housing either general or special e.g. OAP b. Office especially high quality prestige locations c. Other forms of employment generating uses e.g. garden centre, hotel, hospital • Part of the land (the stream is designated as an SINCC) and gives scope for public access. • Has full range of infrastructure available. <p><u>Proposal</u></p> <ol style="list-style-type: none"> 1. The settlement boundary should include the whole of the land edged red on the attached plan. 2. A new policy should be introduced to propose that the land should be the subject to a development brief to respond to the need for: <ul style="list-style-type: none"> • Economic development especially local firms or ones relocating from outside if 	

ID	Respondent	Comment	Proposed Council Response
REF 62 Cont .		<p>existing allocations are unsuitable.</p> <ul style="list-style-type: none"> • Other economic uses (hotel or hospital) • OAP accommodation <p>The NPPF requires new plans to promote development in the most sustainable way and seek net gains in economic social and environmental objectives. There is no evidence of any systemic examination or other land or the comparing of proposed allocations against alternatives. This is a failure of the evidence base in the first place and a clear conflict with NPPF.</p> <p>The DSPD focusses on the quantative aspects of economic development but not as required by NPPF para 161 the quantative elements. The assessment of provision has to take place for all foreseeable types of economic activity. (NPPF words)</p> <p>The Plan relies for its housing allocations on large numbers of small sites many of which are already developed wholly or in part. 7 sites are currently in commercial use these are to be changed to housing use. There is cumulative loss of small sites in economic use; the impact of these is not assessed; an alternative provision should be made to make up what is lost.</p> <p>The NPPF stresses that the plan should be able to respond flexibly to economic opportunities as they arise. There does not appear to be a policy within the DSPD which allows for such a flexible response to save the need of a local farm to relocate or a new firm to come in from outside. The expansion of the settlement boundary has proposed to meet all these objectives.</p> <p>The site should be added both to policy ED2 and to policy H1 table 7</p>	<p>Policy ED1 has been changed to allow for greater flexibility in terms of changes of use between economic development uses, but it also allows for redevelopment where it can be demonstrated that the existing use is no longer appropriate. This should ensure the “non-B” uses that contribute towards economic development are not constrained.</p> <p>All sites currently in commercial use have been removed from the supply due to concerns over existing use values effecting viability.</p> <p>The Plan cannot attempt to cover every possible proposal or eventuality. The evidence base in the South Hampshire sets out an ambitious growth target for employment across the Borough which the DSP Plan seeks to address through the allocation of a number of sites within the urban area boundary.</p>
REF 63	Bryan Jezeph on behalf of clients	<p>Land in Holly Hill Lane (Call for Sites Ref:0082)(SHLAA1012)</p> <p>The land shown on the attached plan to the south and east of Holly Hill Lane is proposed as a site which is suitable for accommodating a scheme for Older Peoples Housing.</p> <p>This site has previously been promoted through the "Call for Sites" exercise and the</p>	<p>The Council is confident that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont		<p>Council therefore holds relevant information about the land.</p> <p>This land could accommodate a "retirement village" which would contribute to the growing crisis in the provision of Older Peoples Housing which has been identified in the Local Plan Part 2.</p>	<p>given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites outside of the urban settlement boundaries</p> <p>The Borough's housing target is taken from population growth forecasts that include the growth in all age groups. It is not considered appropriate, therefore, to allocate specific sites for older persons accommodation over and above the existing housing supply.</p>
		<p><u>1.0 INTRODUCTION</u></p> <p>1.1 This is a comprehensive response to the content and policies of the Local Plan Part 2 made on behalf of clients of Bryan Jezeph Consultancy</p> <p><u>2.0 COMMENTS UPON THE TEXT</u></p> <p>2.1 The layout of the plan is very confusing. As a result, it is proposed to address the text in the order that it is presented and then consider the elements that have not been addressed at all in a separate section of this statement.</p> <p><u>Settlement Boundaries</u></p> <p>2.2 The plan defines both "Urban area and Defined Urban Settlement Boundaries (DUSB)". This appears to be an unnecessarily complicated definition of a boundary of the built up area. What is the difference between the urban area and the defined urban settlement? It should be termed the "defined urban area".</p> <p>2.3 Objection is made to paragraph 3.6 which claims that the boundaries have been reviewed. It is remarkable that the urban boundary which was defined in 2000 should require no revision or adjustment. It is even more remarkable that in defining the boundary in 2000 it should meet exactly with the criteria for defining boundaries as set out in paragraph 3.5 of this Plan.</p> <p>2.4 There is no objective analysis of the edges of the settlements to identify land/sites that are more sustainable than the proposed allocations within the urban area. There are sites on the edge of settlements which have no beneficial use such as land at</p>	<p>"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont .		<p>Bye Road Swanwick; Rosemary Nursery Brook Lane.</p> <p>2.5 Paragraph 3.5 also states that “to include permanent residential buildings which are of a similar density and character to the host settlement or built up area”. There are many examples where development is of a similar density Response to Draft Fareham Local Plan Part 2 Page 2 Bryan Jezeph Consultancy Ltd to the adjoining settlement for example Southampton Hill Titchfield, Common Lane Titchfield.</p> <p>2.6 Notwithstanding the above criticism the definition of a settlement by residential buildings alone is inappropriate. A settlement comprises more than simply residential dwellings.</p> <p><u>Strategic Gaps</u></p> <p>2.7 There have been very few changes to the boundaries of the strategic gaps. It has been pointed out in previous responses that the boundary of the strategic gap in Titchfield passes through part of the Mitie Building on Southampton Hill.</p> <p>2.8 The details have been appended to this statement.</p> <p><u>Economic Development</u></p> <p>2.9 The NPPF recommends at paragraph 22</p> <p>Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of 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 local communities.</p>	<p>the existing DUSBs to meet the Borough’s development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.”</p> <p>The Strategic Gap policy seeks to prevent the coalescence of settlements, therefore the boundary of the gap must be the boundary of the settlements it intends to keep apart.</p> <p>Policy ED1 has been changed to allow for greater flexibility in terms of changes of use between economic development uses, but it also allows for redevelopment where it can be demonstrated that the existing use is no longer appropriate. This should ensure the “non-B” uses that contribute towards economic development are not constrained.</p>
REF 63 Cont .		<p>2.10 Objection is made to paragraph 4.6 which provides for a “reasonable period of time” to be considered as 12 months and extending to 18 months for larger more strategic employment areas. This time period renders land redundant for a too long period of time.</p>	<p>This time period is considered necessary in order for alternative economic development uses to be considered before alternative uses.</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont .		<p><u>Local Employment Opportunities</u></p> <p>2.11 The encouragement to provision of live work units at paragraph 4.13 is supported.</p> <p><u>West Street Speciality Shops</u></p> <p>2.12 Paragraph 5.21 describes the area of West Street to the West of Trinity church as “West Street Speciality Shops”. Appendix I is referred to in the paragraph but there is no separate designation of the West Street Speciality Shops shown on the plan at Appendix I.</p> <p><u>Development Opportunity Sites In The Town Centre</u></p> <p>2.13 Paragraph 5.40 refers to the potential development sites in the town centre which could provide between 140 and 354 dwelling units. This range is so extreme that it is questioned whether these figures are realistic.</p> <p><u>TRANSPORT</u></p> <p>2.14 This section provides in sufficient information on the proposed improvement works. It requires greater elaboration of the issues which are being addressed.</p> <p>2.15 Policy T2 Improvements to the Strategic Road Network safeguards land for future works to the Segensworth roundabout. What additional works are now required? There is no explanation in the Plan.</p> <p>2.16 Policy T3 refers to Improvements to the Distributor Road Network and seeks to safeguard land to complete the Western Local Distributor Road Warsash. Was this not completed many years ago?</p> <p>2.17 The Council is currently collecting financial contributions towards works on the A27 in the vicinity of Brook Lane. There is no mention of these proposed works within the Plan.</p> <p><u>Meeting Housing Needs In The Borough (Chapter 8)</u></p>	<p>Noted.</p> <p>The West Street Speciality Shops policy has been removed, with a further area of West Street now covered by the Secondary Shopping Area policy of the Plan. This is shown on the proposals map.</p> <p>Further work on each of the Town Centre sites has been done, including viability assessments, to ensure that they can be delivered. Some sites have been removed from the Plan and others have had their capacity refined. However, there remains a range to reflect the variety of options that exist on these sites.</p> <p>The Council is in continual discussions with HCC about the need for detail in the Plan. Further information on the works required at Segensworth roundabout will be inserted in the Plan.</p> <p>Noted. This reference has been removed.</p> <p>Not all highways improvements programmes are mentioned in the Plan, only those of significant strategic importance, or those where additional land may be required.</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont .		<p>2.18 It is noted that, in paragraph 8.5 C reference is made to the inclusion of a windfall allowance within the Borough's housing supply in line with the provisions of the NPPF. It is also noted that in paragraph 8.8 the delivery of "small sites" ie below 5 units will provide for flexibility of supply.</p> <p>2.19 Paragraph 8.5 also refers to Appendix F which sets out the methodology for the calculation of the windfall allowance. Response to Draft Fareham Local Plan Part 2 Page 4 Bryan Jezeph Consultancy Ltd</p> <p><u>APPENDIX F</u></p> <p>2.20 It is noted that the windfall allowance has been adjusted to meet with the requirements of the NPPF provisions if windfall are to be counted. This adjustment includes the exclusion of development on residential gardens. It is not made clear the extent to which an adjustment on these grounds has been made.</p> <p>2.21 It is considered that within Fareham Borough a significant amount of small scale development has historically taken place on "garden land". This is due to the manner in which the locality has historically been developed. The area has included significant areas of residential development comprised of detached houses in large gardens. When government policy was first encouraging effective use of urban land Fareham Borough experienced considerable consolidation of the urban area through development on large gardens and this continued until the change of policy in June 2010 when "garden grabbing" was to be resisted.</p> <p>2.22 The difference between figures in Tables 13 and 14 are explained by reference to the adjustment made in respect of removing windfall sites of a capacity of 5 to 9 units. The downward trend between 2007 and 2012 is attributed to the downturn in the housing market. There is no reference to any adjustment for excluding development on garden land. Should the figures for 2007 to 2010 be reduced still further to account for this?</p> <p><u>Windfall Allowance</u></p> <p>2.23 The paragraph on page 179 and continuing on page 180 explains that the Council has identified sufficient housing supply to meet its strategic housing requirements without the need for a windfall allowance. The paragraph goes on to</p>	<p>When reviewing all housing delivered on windfall and coming up with historic windfall rates, developments on residential gardens have not been included (as per the wording of the NPPF).</p> <p>Housing on residential gardens were not included in table 13 or 14.</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont		<p>explain that by excluding the windfall allowance the Council can demonstrate a more robust housing supply. It quite clearly states that the 420 dwelling windfall allowance provides flexibility rather than being included in the supply calculations set out in Table 2.</p> <p>2.24 This paragraph does not accord with Table 2: Housing Delivery Overview 2006-2026) and with paragraph 8.13. Both the Table and the paragraph show 420 houses very clearly contributing to the supply of housing as Response to Draft Fareham Local Plan Part 2 Page 5 Bryan Jezeph Consultancy Ltd “projected windfall”. The inconsistency between the main text and Appendix F must be resolved.</p> <p><u>Policy H1 Housing Allocations</u></p> <p>2.25 Objection is made to the final sentence of the Policy which states:</p> <p style="text-align: center;">The sites will be safeguarded from any other form of permanent development to ensure that they are available for implementation during the plan period</p> <p>2.26 When considering the process of plan-making the NPPF encourages a positive approach to opportunities and sufficient flexibility to be able to respond to rapid change. It states:-</p> <p style="text-align: center;">For plan-making this means that: local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change</p> <p>2.27 It is evident that the last line of Policy H1 is in consistent with this advice. It provides a straitjacket for housing development and precludes any flexibility.</p> <p><u>Self Build Housing</u></p> <p>2.28 Paragraph 8.11 quotes from the NPPF in support of self build housing. The Council is supportive of this policy which is welcomed. However, the allocated sites do not appear to offer any opportunities for self builders. They are either not suitable</p>	<p>Noted. This differentiation between the appendix and the table has been amended. The windfall calculation continued to form part of the Borough’s overall housing supply.</p> <p>All housing allocations are made on sites submitted for residential development. Continual contact with the landowners prior to the publication of the Plan provides the Council with a degree of certainty that these sites will come forward for residential development within the Plan period.</p> <p>Whilst the Council is supportive of self-build in general, this cannot be done at the expense of other policies in the Plan. The Council does</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont .		<p>because of their form or their scale or because of pre-existing ownership considerations.</p> <p>2.29 It appears that the only possible source of self build sites will be infilling sites of which there are now few opportunities.</p> <p>2.30 The owner of land off Bye Road in Swanwick would like to offer the site to a self build group. It could provide 9/10 plots.</p> <p><u>Older People's Housing</u></p> <p>2.31 The section commencing with paragraph 8.21 addresses Old People's Housing and sets out clearly the growing problem of the ageing population. This is evidently a serious issue which needs to start to be addressed in this emerging plan.</p> <p>2.32 The land area requirements of these uses can often exceed the sizes of the sites proposed in the Plan. It is not clear how or where these uses will be accommodated within the urban area. Even if some of the sites could be used for such schemes they would then displace residential schemes and thereby undermine the provision of housing in the Plan.</p> <p>2.33 There is some repetition of the quotation from the <i>Department of Health 2004 Models of Extra Care and Retirement Communities, London</i>. Both paragraph 8.27 and 8.30 contain the quotation "an all-embracing, comprehensive... individual circumstances".</p> <p>2.34 Indeed the paragraphs 8.27 and 8.30 together lead to some confusion over the definition of "retirement communities". In paragraph 8.27 these are suggested as usually providing "luxury accommodation" whereas this is not alluded to in paragraph 8.30.</p> <p><u>Policy H3 New Older People's Housing</u></p>	<p>not consider it appropriate to allocate specific sites for self-build housing over and above general housing allocations.</p>
REF 63 Cont		<p>2.35 This policy sets out the criteria that should be considered when providing for such accommodation. What it fails to do is to provide any land where such accommodation could be provided.</p>	<p>The need for older persons housing is noted within the DSP Plan. However, the overall figure for population growth, which (in part) forms the basis for the housing target does</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont		<p>2.36 The urban boundary is fixed to the same position as it was in 2000. There are few sites available within the urban area which would be large enough to provide some forms of older peoples housing referred to, such as retirement villages. The urban boundary has not been examined to find any sites that could accommodate care homes or retirement villages.</p> <p>2.37 Given the limited supply of land within the urban area it is likely that any available site would be developed firstly for residential purposes rather than for specialist elderly persons housing.</p> <p>2.38 It may be possible to utilise some of the allocated sites for this purpose but this will create a reduction in the overall housing provision. It would also potentially conflict with the last sentence of Policy H1 if it was not entirely “residential”.</p> <p><u>3.0 OTHER CONSIDERATIONS</u></p> <p>3.1 The Plan is silent in respect of some important considerations.</p> <p><u>Affordable Housing</u></p> <p>3.2 In a previous report the Council has stated that it has a need to provide 495 affordable units per annum in the period 2011-2016 which equates to 2495 units in the five year period. There is little prospect of achieving this figure and the Council has not addressed the issue of affordable housing provision in the Local Plan Part 2.</p> <p>3.3 The Plan should make clear how affordable housing will be provided.</p> <p><u>Community Infrastructure Levy</u></p> <p>3.4 There is no mention within the Plan of the Community Infrastructure Levy which will be imposed on all new development being proposed in this Plan. The CIL is likely to be a further inhibitor of development especially for those sites which are currently of marginal profitability.</p> <p>3.5 CIL contributions may well act as a deterrent to new development. Some identified sites have been allocated in previous Local Plans dating back to the late 1970’s. Given that these sites have not come forward in excess of 30 years it seems</p>	<p>take account of growth in those people living longer. It is, therefore, not considered appropriate to allocate additional sites specifically for elderly persons accommodation over and above the general housing allocations needed to meet the housing target.</p> <p>The Council’s overall housing requirement is set out in the South Hampshire Strategy. The Council does not calculate housing requirements by affordable housing alone. That said, the need to provide suitable numbers of affordable housing is an ongoing issue for the Council. It is worth noting that a large proportion of the Borough’s affordable housing need is expected to be met within Welborne.</p> <p>Viability assessments have been done on all the housing allocations within the Plan. These assessments included the new CIL requirement as a cost that is non-negotiable. A number of sites have been removed from the Plan as a result of not being viable, however</p>

ID	Respondent	Comment	Proposed Council Response
REF 63 Cont .		<p>improbable that development will take place now in time to be subject to CIL contributions.</p> <p>3.6 There has been no analysis of the likely impact of CIL on the housing land supply. It seems likely that it will depress the release of sites.</p> <p><u>National Planning Policy Framework</u></p> <p>3.7 There are obvious omissions with regard to the consideration of the guidance in the National Planning Policy Guidance.</p> <p>3.8 There is no evidence that the Plan has examined the need for choice and flexibility. Paragraph 17 states that:-</p> <p style="text-align: center;">Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;</p> <p>3.9 There is an over emphasis on sites where flats are preferred on unattractive and difficult sites such The Croft on Redlands Lane and Station Road Portchester. These are sites on main roads where traffic noise and pollution will be serious issues.</p> <p>3.10 The limitation to sites within the existing urban area limits flexibility and there is no contingency should viability prove to be a serious issue. Paragraph 21 states that:-</p> <p style="text-align: center;">Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;</p> <p>3.11 The Inspector who is examining the East Hampshire Joint Core Strategy has expressed concern that the Plan will not be able to meet its housing requirements. He has required the Council to contact adjoining authorities to see if they can make good any shortfall. This is clearly a need in Fareham Borough where there is an</p>	<p>the Council remains confident that it can demonstrate a robust housing supply.</p> <p>All sites have been assessed for viability by an independent consultancy. This has taken account of market signals such as relative land values across the Borough and the current attractiveness of flats versus houses in the Borough.</p> <p>It is not considered that there is an “over-emphasis” on flats with the majority of the remaining sites in the Plan likely to be developed for family housing. The Station Road site has been removed from the Plan for viability reasons. Croft House is well shielded from the Avenue and is more likely to front Redlands Lane in the first instance.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>expectation that the North of Fareham Strategic Development Area will fail to provide 544 completions each year from 2016 onwards.</p> <p>3.12 Thus, there could be a significant deficiency in the five year period. Paragraph 181 states that:-</p> <p style="text-align: center;">Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.</p> <p>3.13 The Winchester District Local Plan Part 1: Joint Core Strategy proposes two Strategic Development Areas in the PUSH part of the District at Whiteley where 3000 dwellings are proposed in the extended period to 2031 and West of Waterlooville where 2500 dwellings are proposed in the same period. Although these figures are significantly lower than the proposal for the North of Fareham Strategic Development Area of 5400 in the period to 2026 and 7500 by 2031, the Winchester Core Strategy acknowledges that its SDAs may not achieve their respective targets.</p> <p>3.14 The Plan also indicates that the SDAs are only expected to achieve the figure of 299/300 completions in the highest years. This clearly contrasts with the expectation that the North of Fareham Strategic Development Area will provide an average of 544 completions each year. Paragraph 3.72 of the Winchester District Local Plan Part 1: Joint Core Strategy states with regard to the Whiteley SDA that:-</p> <p style="text-align: center;">“The housing trajectory.....expects that this site will start to deliver housing in 2015/2016 and that this will continue over a 15 year period, rising to 300 dwellings per year at its peak of development. If at some point in the future it becomes clear that the site is failing to deliver the level of housing proposed, the implications for the Council’s ability to ensure adequate housing land supply across the District will be</p>	<p>It is noted that previous assumptions on the delivery rate of Welborne were over ambitious. A revised trajectory has been included in the Welborne Plan. However, it is not accepted that the rest of the Borough should necessarily meet the shortfall arising from this change in the delivery rate. The figures for Welborne are separate from those for the rest of the borough; therefore any shortfall in supply up to 2026 should be met through a review of the South Hampshire Strategy and subsequent local plan. A revised South Hampshire</p>

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		<p>assessed. It may be that other sources of supply can maintain adequate housing provision or it may also be necessary to bring forward additional sites for housing purposes in accordance with the development strategy established in this Plan.”</p> <p>3.15 The Winchester District Local Plan Part 1: Joint Core Strategy has recognised that the Strategic Development Areas of West of Waterlooville and Whiteley could fail to achieve their respective trajectories and that, in this eventuality, other sites will be found. The trajectories indicated that a maximum of 299 and 300 dwellings per annum respectively could be anticipated in West of Waterlooville (para. 3.61) and Whiteley (para. 3.72) respectively. Even 299/300 is a very ambitious target. These are figures that exceed the highest annual total achieved in South Hampshire in the boom years of the 1980's of 280 units in the Hedge End MDA.</p> <p>3.16 There is no reason why the same principle should be applied in the (certain) event that the North of Fareham SDA fails to achieve its annual target of 540 dwellings per annum (5400 dwellings in the period 2011-2026). The Fareham Borough Local Plan Part 2 should provide a pool of 'reserve' sites to provide for the anticipated shortfall. This is the only way in each a series of competitive planning appeals can be avoided.</p> <p>3.17 A number of sites have been advanced in the SHLAA and the Call for Sites and these are listed below. (The Call for Sites Ref is in brackets)</p> <p>Hampshire Assets Land North of Cranleigh Road Portchester Ref:0007 (0040)</p> <p>Edward Vinson Ltd Peak Lane Nurseries Peak Lane Stubbington Ref: (0050)</p> <p>Steve Dunleavy and Fiona Webb. Land East of Bye Road Swanwick Ref: 0006 (0039)</p> <p>Mr J Fielder and others Land at Bridge Street Titchfield Ref: 0028 (0044)</p> <p>Fielder Life settlement and at Beacon Bottom Park Gate (0052a)</p> <p>Mr Brian Edwards and others. Land South of Greenaway Lane Warsash Ref:0024 (0079)</p>	<p>Strategy is considered the suitable mechanism for providing altered housing requirements.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>Miss N Bawtree. Land at Backacre, Brook Avenue Warsash Ref: 1174 (0069)</p> <p>Mr Andrew Norris. Land in Brook Avenue Warsash. Ref:1013 (0061 and 0095)</p> <p>Mr A Lawrence and other Landowners. Land east of St Margaret's Lane Titchfield Ref:1001 (0076)</p> <p>Mr N Castle and Swanwick Landowners Group. Land at Upper Swanwick (west of Botley Road) Burrige Ref:1044 (0060)</p>	
REF 64 REF 64 Cont .	Barton Willmore on behalf of Robin Shepherd	<p>We write on behalf of clients of Barton Willmore in respect of Fareham's Draft Development Sites & Policies Plan which is currently the subject of public consultation and set out our representations below.</p> <p>In addition to and in support of our response to the Plan, Barton Willmore has produced a report fare/mm Borough Housing Requirements Assessment (November 2012) which provides an up-to- date, objective assessment of Fareham Borough's future housing requirements using the highly regarded and accepted Popgroup Model (see attached) We request that this Assessment be formally considered in full by the LPA as part of our submission.</p> <p>Land is being promoted to the south of Fareham, to the east and west of Peak Lane, with a combined capacity of between 1,700 - 2,550 dwellings. A Landscape and Visual Appraisal of this Site has been undertaken and is enclosed with these representations This is a deliverable site within the plan period that will go a significant way in meeting the Boroughs housing requirements in a sustainable location near to the Daedalus Enterprise Zone and will help support Fareham Town Centre's role as the principal centre in the Borough In addition, the Site is capable of delivering a range of infrastructure, including a new local centre, including improvements and enhancements to the existing local centre and new primary school It is envisaged that the development will invest in enhanced bus services to and from Fareham Town Centre and will therefore assist in maintaining the vitality and viability of the existing settlement.</p> <p>Response Summary</p> <p>To summarise our response, we consider the Draft Development Sites & Policies</p>	<p>The Council is utilising the housing targets set out in the South Hampshire Strategy. These targets were developed through cooperation with all other authorities within the PUSH area, and thus forms part of Fareham Borough Council's duty to cooperate. Accepting an independent needs assessment in place of the South Hampshire Strategy would render the previous cooperation work redundant.</p> <p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target (as set out in the South Hampshire Strategy) for the Borough, additional greenfield sites are not required.</p>

ID	Respondent	Comment	Proposed Council Response
REF 64 Cont .		<p>Plan fails all the National Planning Policy Framework (NPPF) tests of soundness for the reasons provided below.</p> <p>The Plan is not positively prepared: The NPPF requires plans to be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities. The Plan does not provide an objectively assessed evidence base particularly in relation to housing and employment needs / requirements. As the Plan seeks to implement the Core Strategy and, apparently, the South Hampshire Strategy (SHS) (2012), there is no objectively assessed needs evidence base for these Plans either. Furthermore, there is no evidence base that sets out the degree to which the NCNF is meeting local and subregional housing needs / requirements. See attached Barton Willmore's Analysis of the South Hampshire Strategy's Downward Housing Revisions.</p> <p>In the absence of such an evidence base, we have undertaken a Fareham Borough Housing Requirements Assessment, utilising the latest available Central Government population projections, and the highly regarded Popgroup Population and Housing Model, and have concluded that the objectively assessed housing requirements within the Plan period for the Borough is at least 8,868 new homes over the plan period (2011 - 2026) equating to 591 dwellings per annum. The SHS indicates that the New Community North of Fareham (NCNF) will deliver 5,400 dwellings over the Plan period and the SHS and Development Sites & Policies Plan indicate that the rest of the Borough will deliver 2,200 dwellings over the Plan period. The LPA is planning for 7,600 dwellings to be delivered in the Borough over the Plan period resulting in a shortfall of at least 1,268 dwellings over the Plan period failing to meet the objectively assessed needs for market and affordable housing in the Borough. We therefore consider that the ISA should be pursuing a target of at least 3,468 dwellings for the Development Sites & Policies Plan period (2011 - 2026) for the area outside the NCNF just to meet the needs of the Borough. This figure of 3,468 dwellings is based on the assumption that the housing requirements for the NCNF and the rest of the Borough are only meeting local needs. If the NCNF is partially fulfilling a sub-regional role, the housing requirements for the Borough will obviously be much greater. The L.PA must provide evidence that defines the local I sub-regional split without delay or will fail its duty to plan properly for the current and future local and sub-regional population.</p>	<p>The Council is utilising the housing targets set out in the South Hampshire Strategy. These targets were developed through cooperation with all other authorities within the PUSH area, and thus forms part of Fareham Borough Council's duty to cooperate. Accepting an independent needs assessment in place of the South Hampshire Strategy would render the previous cooperation work redundant.</p>

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REF 64 Cont .		<p>The employment provision for the Borough set out in the Plan fails to reflect the South Hampshire Strategy (October 2012) which plans for 100,000 sqm of employment floorspace excluding the SDA. Instead the Plan appears to be planning for Core Strategy target of 41,000 sqm of employment floorspace.</p> <p>The Plan is not justified: The NPPF requires plans to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. The Sustainability Appraisal and the Plan do not set out any reasonable alternatives to the strategy and sites selected. Furthermore, the Sustainability Appraisal does not provide an assessment of the development needs as a result of the South Hampshire Strategy housing and employment floorspace targets despite the Plan's reliance on these, therefore the findings of the SA cannot be relied on for plan and decision making.</p> <p>Despite Fareham's Core Strategy commitment to reviewing the settlement boundaries of each individual settlement in the Borough, there is no robust or credible evidence to support how the settlement boundaries have been determined and it appears they have simply been 'rolled forward' from the Fareham Borough Local Plan Review (2000). This approach is obviously not a robust way to plan the future development of the Borough and risks excluding sites that are more suitable and more capable of delivery than sites that happened to be within a spuriously defined boundary from over a decade ago. The LPA's approach to defining the Borough's settlement boundaries is at odds with the NPPF requirements for local plans to be prepared positively and proactively to meet the objectively assessed development needs of the area. A full review of the settlement boundaries is required to ensure conformity with the Core Strategy and to accommodate the housing and employment requirements of the Borough.</p> <p>The Plan is not effective: The NPPF explains that plan should be deliverable over their period and based on effective joint working on cross-boundary strategic priorities. The Plan not only fails to make provision for adequate housing to meet the economic growth set out in the South Hampshire Strategy (2012), see our enclosed Fareham Housing Requirements Assessment. It also fails to make provision for a range of deliverable employment sites to meet the South Hampshire Strategy's employment floorspace target s. As a result we have serious concerns regarding the Plan's housing and employment floorspace target as well as its housing and</p>	<p>Noted. This has been amended with additional evidence undertaken in the form of the Fareham Employment & Sites Study 2013 which recommends planning for 100,100sq.m of employment floorspace.</p> <p>Alternative options for the focus of the Development Sites & Policies Plan were considered during the Issues & Options stage. The draft plan represented the Council's "preferred approach", which has now been amended where necessary in the publication version of the Plan. The SA has been updated.</p> <p>Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p> <p>The Council is utilising the housing targets set out in the South Hampshire Strategy. These targets were developed through cooperation</p>

ID	Respondent	Comment	Proposed Council Response
REF 64 Cont .		<p>employment land supply and consider it critical for the Local Planning Authority (LPA) to update its evidence base and Plan to reflect these identified flaws. We attach an analysis of the South Hampshire Strategy which demonstrates that the South Hampshire Strategy is not based on sound or objectively assessed evidence base.</p> <p>Paragraph 14 of the NPPF states that:</p> <p style="text-align: center;">“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”.</p> <p>The Plan fails this test as there is no flexibility in the Plan for alternative sites to come forward should the intended sites identified in the Plan not be delivered and if the New Community North of Fareham does not deliver in line with its trajectory,</p> <p>It is not clear how the Council has undertaken effective joint working on cross-boundary strategic priorities and does not provide evidence of fulfilling its Duty to Cooperate. Although the South Hampshire Strategy has been adopted by PUSH’s Joint Committee it does not represent a plan for growth given that it plans for less housing than the South East Plan. Nor has the Strategy been subject to public scrutiny or a legitimate Sustainability Appraisal given that there was no public consultation on the Plan and only a Sustainability Appraisal ‘lite’ was undertaken which as far as we are aware is not a term used in the relevant European Directive or Planning Act. Furthermore, Fareham appears to accept the housing figures from the South Hampshire Strategy but disregards the employment floorspace target. This is an inconsistency that must be addressed by the LPA as the South Hampshire Strategy should not be treated as a ‘pick and mix’ if the LPA is serious about delivering the agreed sub regional strategy.</p> <p>In addition, a number of the site allocations for the plan period are not realistically deliverable and are simply ‘rolled forward’ from the Local Plan despite NPPF paragraph 22 which requires the LPA to take account of market signals and not rely on sites that the market clearly does not favour hence making such sites undeliverable.</p> <p>The Plan is inconsistent with national policy: It is noted with great concern, that the Council has not undertaken a review of the Core Strategy for NPPF compliance and does not indicate when this review and related public consultation will take place.</p>	<p>with all other authorities within the PUSH area, and thus forms part of Fareham Borough Council’s duty to cooperate. Accepting an independent needs assessment in place of the South Hampshire Strategy would render the previous cooperation work redundant.</p> <p>A Duty to Cooperate Statement will be published alongside the DSP Plan which sets out how the Council has met its duty to cooperate.</p> <p>The employment floorspace figures have now been taken into account.</p> <p>The Council has been in continual discussion with the landowners of sites within the Plan to ascertain their deliverability. Viability assessments have also been undertaken to ensure that the supply of housing sites can be considered robust.</p> <p>A review of the Core Strategy has been undertaken in house to ascertain its</p>

ID	Respondent	Comment	Proposed Council Response
		<p>By publishing this draft Plan ahead of such a review the Council is prejudicing its outcome as for example the Council may determine that the NPPF does not support the 'strategic gap' designation as adopted in the Core Strategy. Such conclusions would result in wasted public money on undertaking this current consultation on the Draft Development Sites & Policies Plan.</p> <p>There is considerable work to be undertaken if the Council is to succeed in meeting its long term economic and housing needs for the Borough. To achieve this, a review of the quantum of new homes to be provided within the Development Sites & Policies Plan is required by the LPA to identify a more appropriate level of housing in Fareham Borough that will meet the housing and economic needs of the area and comply with Government policy including paragraph 17 of the NPPF which states that:</p> <p>“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”.</p> <p>As a result the LPA needs to reconsider its development strategy including its settlement boundaries based on our representations and re-consult on its Draft Development Sites & Policies Plan following a review of the Core Strategy for NPPF compliance before publishing its pre-submission Draft Plan.</p>	<p>compliance with the NPPF. The conclusions are that, in general, the Core Strategy is in compliance with only a few textual references that would need updating. This is due to be published in due course.</p>
REF 65 REF 65 Cont .	Lambert Smith Hampton on behalf of Hampshire Constabulary	<p>We are writing in response to the current public consultation on the Fareham Local Plan. On behalf of Hampshire Constabulary we wish to make the following comments.</p> <p>Chapter 10 of the Draft Plan addresses the issue of Community Facilities and paragraph 10.3 states that community facilities include some policing facilities. Paragraph 10.4 then goes on to state that community uses should be easily accessible to users and that the Council will encourage new uses to locate in town centres and local centres as these locations are well served by public transport. Furthermore, paragraph 10.5 indicates that community uses may be appropriate in residential areas where they do not have a demonstrably harmful impact on the amenities of nearby residential properties and other uses in terms of noise and traffic generation, or on the character of the surrounding area.</p> <p>Policy CF1 sets out the Council's approach to community facilities, outlining those</p>	<p>The Council will be happy to work with the Hampshire Constabulary to consider suitable sites for a potential Police Investigation Centre within the Borough. However, the Council does not consider Policy CF1 applicable to a PIC given the lack of public and community access to the facility. It is likely that any proposal for a PIC would be assessed under the employment policies within the Plan.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>situations where the loss of community facilities would be permitted and the requirements to allow the development of new or extended community facilities.</p> <p>The policy and supporting justification is particularly relevant to Hampshire Constabulary at this time because of the changes to the delivery of the policing across the County, details of which have already been shared with the Council and the public. In particular, it is proposed to create four new Police Investigation Centres (PICs) while a number existing Police Stations will close. An appropriate site for the development of a PIC (or a building for conversion) is currently being sought within the borough of Fareham. However, a new PIC in Fareham will not mean that the current police station will be closed.</p> <p>A PIC is not a traditional police station and does not need to be easily accessible to the public nor located in a town centre. On that basis an appropriate location may be a mixed use / employment area. Assuming that a PIC falls within the Council's interpretation of a community facility then the tests set out in Policy CF1 would not be unreasonable for a variety of locations where Hampshire Constabulary is considering locating a PIC and support can be given to draft Policy CF1.</p> <p>Where Hampshire Constabulary may be considering the re-provision of services and the closure of police stations, we would support the current wording of policy CF1 as it allows for the re-provision of services at a suitable alternative location. This appears to support the changes in the operation of the police estate. We would welcome further discussion on the definition of the community services included in this policy, as it currently refers to 'some policing facilities'. As outlined above, the way Hampshire Constabulary operates is changing and this needs to be appropriately reflected in planning policy moving forward.</p>	
REF 66	Woolf Bond Planning representing Taylor Wimpey & Bovis Homes	<p>We presently have an application lodged on behalf of our clients, Taylor Wimpey UK Ltd and Bovis Homes Ltd. proposing the erection of 207 no. dwellings (including affordable housing provision), new vehicular access, the provision of associated open space and recreational facilities, transport and drainage infrastructure, landscaping and parking on land to the south of Peters Road, Locks Heath (LPA Ref. 95164).</p> <p>We note the inclusion of the site as a retained housing allocation within the draft version of the Plan and consider the site remains suitable for residential development on land shown on the land the subject of the above application at the scale proposed.</p>	Noted.

ID	Respondent	Comment	Proposed Council Response
		Accordingly please keep us informed as to future iterations of the Plan.	
REF 67	Turley Associates representing Southampton Solent University	<p>On behalf of our clients, Southampton Solent University ('the University'), this submission has been prepared in response to Fareham District Council's Draft Local Plan Part 2: Development Sites & Policies document. Our client's interest relates in particular to the Warsash Campus of Southampton Solent University (also known as Warsash Maritime Academy) and our comments on the draft document are made in this context. A site location / identification plan is attached.</p> <p>Background</p> <p>In December 2011, a meeting was held with officers of Fareham Borough Council (Linda Jewell and Troy Cooper) to discuss the planning policy context of the Warsash Campus. Subsequently a representation was submitted in response to Fareham BC's 'call-for sites' process (copy attached).</p> <p>The Planning Policy Position for the Warsash Campus</p> <p>There is currently no site specific policy for the Warsash Campus site. Historically, there was a policy designation (FS3 – Education Establishments and Institutions in the Countryside) which applied to educational sites outside settlement boundaries and differentiated them, in policy terms, from wider areas of undeveloped countryside. The Warsash site was covered by this policy which was positively worded to permit proposals for additional buildings, or extensions to existing institutions, for educational purposes. Whilst many Local Plan policies were 'saved' pending adoption of the Local Development Framework however Policy FS3 was not 'saved' and thus the default policy position is currently a general countryside development policy (Policy C1) and a 'new Our ref: SOUW2013 Your ref: 2 buildings in the countryside' policy (Policy C3), both of which are restrictive, provide less certainty and do not create a framework which would allow a more holistic approach to be taken to the future development of, or investment in, the Warsash Campus for education related development or other purposes.</p> <p>The site is affected by a number of environmental designations including international ecological designations abutting its boundaries, a blanket Tree Preservation Order across the whole site and the presence of a number of Listed Buildings. These designations represent potential constraints to development and, over the past twelve</p>	Noted. The Plan has now been amended to incorporate an "Educational Facilities in the Countryside" Policy which allows for the appropriate expansion of educational facilities that are outside the urban areas. This covers not only the Warsash Campus of Southampton Solent University, but a number of HCC owned facilities and some private schools as well.
REF 67			

ID	Respondent	Comment	Proposed Council Response
Cont .		<p>months, the University has commissioned various studies to gain a more detailed understanding of the degree to which environmental designations and other factors may impinge on the ability of the site to accommodate further development, or indeed the redevelopment of existing buildings and facilities.</p> <p>The University Estate Context</p> <p>The University is conscious that the Fareham Local Development Framework will provide the planning policy framework for development within the Borough over the period 2011 to 2026. With the Core Strategy recently adopted, the University is keen to engage with the Council to establish a positive planning policy framework for the Warsash Campus site.</p> <p>The University will likely undertake a review of the role and function of the Warsash Campus within the life of the LDF and, whilst no firm proposals have yet been formulated, it would be beneficial to any future proposals for development, to establish an agreed planning framework within which proposals for additional development, rationalisation or redevelopment could come forward.</p> <p>The University considers that there is a clear justification for a policy approach which recognises that the Warsash Campus is different (in terms of its lawful use and the amount of built development on the site) from the wider undeveloped countryside and recognises that the site will have a role to play in meeting the future needs for educational or other development in the Borough.</p> <p>Accordingly, The University considers that the Council should include a site specific policy within the Sites and Policies Document, which recognises that the site can be differentiated from the surrounding countryside and that, as an existing developed site, additional development, rationalisation or redevelopment, if designed appropriately, could have a positive impact on the use and character of the site without any further significant impact on the countryside. The University wishes to work positively with the local planning authority to establish an agreed framework for the site.</p> <p>This approach would benefit both the Council and the University, by providing greater certainty.</p> <p>Representation Regarding Omission of a Site Specific Policy for the Warsash</p>	

ID	Respondent	Comment	Proposed Council Response
REF 67 Cont .		<p>Campus</p> <p>The University considers that the failure to include a site specific policy, which will provide a framework for future development, redevelopment or rationalisation of the Warsash Campus, within 3 the Local Plan Part 2: Development Sites and Policies Document, campus is in effect a missed opportunity to plan positively for future development needs.</p> <p>The draft Development Sites and Policies document states at paragraph 1.7:</p> <p>“The role of the Development Sites and Policies Plan is to provide site specific and development management policies for the Borough for the plan period up to 2026. The purpose of the plan is threefold:</p> <ol style="list-style-type: none"> 1. Allocate sites principally for housing, employment and retail and other community facilities as necessary; 2. Review and designate areas in the Borough such as settlement boundaries and strategic gaps; 3. Set out Development Management policies by topic areas including Design and Town Centre Uses. “ <p>Paragraphs 1.16 and 1.18 specifically acknowledge that the draft document will be amended as a result of the current consultation and that there is an opportunity to identify any development sites or development needs which may have been missed. The University will seek to work with the local planning authority, to develop a site specific policy approach for the Warsash Campus in the anticipation that it can be included within the Pre-submission version of the Development Sites and Policies DPD and will provide the local planning authority with relevant background studies. Representations on Specific Policies</p> <p>With regards Chapter 1, the University supports the inclusion of draft Policy SD1 (Sustainable Development) which sets out the presumption in favour of sustainable development and the Council’s commitment to take as positive approach to development that reflects the National Planning Policy Framework (NPPF) position.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 67 Cont .		<p>In respect of Chapter 3, the University supports the Council's review of strategic gaps and the deletion of the Strategic Gaps other than as identified by Core Strategy Policy CS22. Chapter 9 of the Development Sites and Policies Document sets out 'Development Guidelines' in policies DG1 to DG4. Policy DG2 is considered to be too tightly drafted in that it requires that:</p> <p>"Development proposals will be expected to demonstrate that they do not individually or cumulative have an adverse impact on either neighbouring development, adjoining land or the wider environment by reason of noise, dust, fumes, heat, smoke, liquids, vibration, light or air pollution".</p> <p>As drafted the policy indicates that any development which has an adverse effect either individually or cumulatively will be refused. This is considered unduly onerous and does not reflect the proportionate approach required by the NPPF. Whilst the minimisation, or avoidance, of harmful impacts should be a development objective there will be circumstances in which a modest adverse impact is bot unavoidable and acceptable having regard to the balance of planning consideration.</p> <p>Chapter 10 relates to community facilities and green space and recognises the importance of such uses.</p> <p>Paragraph 10.2 notes that:</p> <p>"Strategic Objective SO9 of the Core Strategy is "To improve accessibility to and facilitate the development and expansion of leisure, recreation, community, education (our emphasis) open space and health facilities and services. Achieve better access to green spaces close to where people live and work, to encourage healthy active lifestyles".</p> <p>"Education" is specifically considered at paragraphs 10.15 to 10.17 however the assessment is confined to consideration of school places and does not consider tertiary education or the University sector.</p> <p>Paragraph 10.7 lists the factors that should be evidenced when considering the loss of any community or educational use and Policy CS1 sets out the policy approach to the potential loss of community and educational facilities. The policy as drafted is</p>	

ID	Respondent	Comment	Proposed Council Response
REF 67 Cont .		<p>considered to be too prescriptive (it is in essence a 'one-size-fits-all' policy and does not have regard to the individual considerations and circumstances which may affect either the continuing provision of a given facility or the need to develop or introduce new facilities. The requirement to demonstrate a 'need' for new facilities is not consistent with the NPPF and, as a policy test, is not precisely defined.</p> <p>Chapter 11 relates to coastal change and new moorings, three Coastal Change Management Areas (CCMA) are proposed in the Borough as part of the document to which draft Policy CM1 refers (Coastal Change Management Areas). A small part of the Hook Spit to Workman's Lane CCMA covers the Warsash Maritime Academy site.</p> <p>It is unclear exactly how the extent of the CCMA's has been established as there is no detailed information within the supporting documentation to justify the full extent of their designation. Whilst it is accepted that the identification of such areas is required (as appropriate) as part of the NPPF, it is unclear how these specific locations and the scale of the designations has been decided upon. Given the restrictive nature of the designation, the University questions whether it is necessary for the Hook Spit to Workman's Lane CCMA to extend into the Warsash Maritime Academy site. The Warsash Campus is a nationally, and internationally recognised centre for the provision of maritime training and the imposition of additional designations which may impact on the ability to provide and develop such training requires careful justification. Draft Policy CM1 is very restrictive stating that new dwellings or the conversion of existing buildings will not be permitted within the CCMA's identified. There is absolutely no flexibility within the policy to allow any new residential development by way of exception and it is considered that some flexibility should be built into the policy. There may be occasions where there are justifiable exceptional circumstances that would warrant the approval of new development in such locations, which the draft policy would not currently allow for.</p> <p>Finally in relation to this chapter, it would be helpful if the CCMA's are given the same titles in Table 4, Policy CM1 and the Proposals Map legend to avoid any confusion as the titles currently differ.</p> <p>Chapter 13 relates to the Countryside and sets out the circumstances where new</p>	

ID	Respondent	Comment	Proposed Council Response
REF 67 Cont .		<p>residential development will be permitted. The overall policy approach is very restrictive and whilst the exceptions criteria for new residential development set out under draft Policy C1 (New Residential Development in the Countryside) is noted, there is no mechanism to allow the redevelopment of appropriately located brown field sites in the Countryside. This is a surprising omission as such sites can contribute towards the overall housing supply,</p> <p>As noted above, the Unicversity considers that a site specific policy should be introduced to recognise the specific, and unique within the Borough, circumstances of Warsash Campus.</p> <p>With regards Chapter 16, Delivery and Monitoring, we would query whether the allocations that have been carried forward from the Fareham Local Plan Review (2000) have been subject to any site assessment to ensure they still meet the necessary tests of the NPPF.</p> <p>Proposals Map</p> <p>With regards the proposal map changes and specifically the legend, it is noted that the CCMA policy reference in brackets is CC1; however the relevant policy contained within the draft document is CM1. It is assumed that this is an error that should be corrected.</p> <p>Again as noted above, a site specific policy boundary should be introduced in respect of the Warsash Campus.</p> <p>Summary</p> <p>We trust that the above representations are clear and hope that they will assist the Council in the preparation of the Pre-Submission document.</p>	
REF 68		This representation has been withdrawn.	
REF 69	Robert Tutton Town Planning Consultants Ltd on behalf	Paragraph 85 of the National Planning Policy Framework states that 'When defining boundaries, local planning authorities should...define boundaries clearly, using physical boundaries that are readily recognisable and likely to be permanent'. A boundary that does not meet that test is likely to be later found to be 'unsound'. On the western edge of Stubbington/ Hill Head, the Urban Area Boundary is co-terminus	"Core Strategy Policy CS6: The Development Strategy seeks to prioritise the reuse of previously developed land within DUSBs. This approach is also advocated in the NPPF, which states that t "planning

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	of the estate of P.M. Chappell	with the garden ends of residences that face east Knights Bank Road at the south end; at the north end, it also follows the garden ends of residences that face east to Cuckoo Lane, Country View, The Oaks and Turtle Close; in the central section, however, the Urban Area Boundary follows the east side of Old Street. For consistency of approach, the Urban Area Boundary should follow the garden ends of the residences that stand on the west side of Old Street. It is submitted that the Urban Area Boundary should be extended to the west of Old Street, in the manner shown on the attached plan.	<p>should...encourage the effective use of land by reusing land that has been previously developed[1]".</p> <p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan."</p>
REF 70	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Many thanks for the above consultation. Natural England has reviewed the Local Plan Part 2: Development Sites and Policies Plan (including the accompanying Sustainability Appraisal/ Strategic Environmental Assessment report and Habitats Regulations Assessment), and have the following comments to make.</p> <p>Evidence supporting allocation process and their deliverability.</p> <p>With the exception of the employment sites we have not looked in detail at the allocated sites due to the large number and small size of the individual allocations. However the following points apply to all allocations:</p> <p>The NPPF requires that allocations are made on the following basis:</p> <p>110 Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework</p> <p>165 Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area.</p>	

ID	Respondent	Comment	Proposed Council Response
REF 70 Cont .		<p>It is unclear how environmental or amenity value have been assessed, in particular biodiversity, landscape and recreational value, and on this basis it might be considered that the plan is unsound.</p> <p>With respect to biodiversity, we note that policy CS4 states “Where possible, particularly within the identified Biodiversity Opportunity Areas, sites will be enhanced to contribute to the objectives and targets set out in UK, Regional, County and Local Biodiversity Action Plans. Green Infrastructure networks, which buffer and link established sites, whilst also enabling species to disperse and adapt to climate change will be maintained and enhanced.” We assume that local, national and international sites were factored into the process via the Sustainability Appraisal. However, we would wish to see Biodiversity Opportunity Areas and Green Infrastructure networks included in the allocation process.</p> <p>In addition for all allocated sites we advise that the council is satisfied that the sites are deliverable with respect to protected species.</p> <p>Paragraph 98 of ODPM Circular 06/20051 states that</p> <p>“The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.”</p> <p>Paragraph 99 also states that</p> <p>“It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted otherwise all relevant material considerations may not have been addressed in making the decision.”</p> <p>In the absence of any information about the above there is concern that the allocations may not be deliverable.</p>	<p>All sites have been assessed for their ecological value in conjunction with the Ecology Team at Hampshire County Council. Where specific mitigation measures are required they have been set out in the relevant development briefs for specific sites. This process included looking at whether there are any potential protected species on site.</p>
		<p>New Employment development: Draft policy ED2:</p> <p>Notwithstanding the development brief, it is not clear that this policy is deliverable in the light of NPPF para 118; When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following</p>	<p>Whilst it is noted that Solent 2 does have ecological value there is an outstanding planning consent which has been started. Therefore the principal for development has been established and thus the proposed</p>

ID	Respondent	Comment	Proposed Council Response
REF 70 Cont .		<p>principles...</p> <ul style="list-style-type: none"> · planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. · if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused <p>It is unclear how much of the site can be developed without resulting in the loss or deterioration of irreplaceable habitats, and how compensation would be approached. In the absence of both of these pieces of information, we advise that that policy may be undeliverable, and hence unsound. In particular any compensation should be such that there is no net detriment to biodiversity, which is likely to involve replanting ratios much higher than 1:1. Whilst there is no standard approach to determining such ratios, you may wish to consider the metric for the biodiversity offsetting pilot in England http://www.defra.gov.uk/publications/2012/04/02/pb13745-bio-tech-paper/</p>	allocation must be considered deliverable.
		<p>Development Guidelines and Environmental Impact policies</p> <p>Natural England would recommend that draft policy DG2 and its supporting text include reference to the need for the use of sustainable drainage systems, and best practice measures in construction, to reduce water quality impacts from new developments, particularly to avoid impacts on water-related designated nature conservation sites.</p>	Noted. Supporting text has been amended to clarify this point.
		<p>Community Facilities and Open Space policies</p> <p>In draft policy CF1, Natural England would like to see reference to the need to ensure that „the proposal will retain and enhance green infrastructure and biodiversity“. We note that CS24 states: “Borough Council will seek the provision of accessible greenspace which meets the standards set out in the South East Green Infrastructure Framework including Accessible Natural Green Space standards ” We also note that the Plan states 10.27 “At a strategic level the amount of accessible natural greenspace in or close to the Borough does not meet the South East Green</p>	<p>This is considered to repeat other policies within the Plan and is partly covered by Core Strategy Policy CS4.</p> <p>The Plan does include a section in Green Infrastructure that commits the Council to aid the implementation of the PUSH GI strategy.</p>

ID	Respondent	Comment	Proposed Council Response
REF 70 Cont		<p>Infrastructure Framework76 standards for accessible natural greenspace, particularly in relation to the 2ha and 500ha sites. The PUSH Green Infrastructure Strategy77 recommends two projects, Chilling Farmland and the Forest of Bere Land Management Initiative, which could improve accessibility to the larger sites. It also recommends several other projects, including conserving and enhancing the Lower Meon Valley, River Meon, Hamble and Wallington corridors, Hook Lake, Fareham Creek/Lake and Portsmouth Harbour Northern Shore; creating and enhancing links and access around Chilling Farmland and Portsdown Hill; and a greenway connecting Locks Heath to the River Hamble and enhancement of Park Lane Recreation Ground.” The Plan appears to be silent on how it proposes to address these deficiencies and support these projects. We advise that for the Local Plan Pt 2 to be consistent with the Core Strategy, it should set out how it proposes to address these deficiencies and support these projects.</p>	<p>The Council is also producing its own GI strategy to identify how this will be done.</p> <p>DSP12 now includes reference to two open space allocations (Coldeast and Daedalus) to help meet open space deficiencies.</p>
		<p>Coastal Change policies</p> <p>Natural England welcome this section of the Plan, which is required in the National Planning Policy Framework, and consider that draft policy CM1: Coastal Change Management Areas is a reasonable response to the environmental risks arising from coastal and climate change, and should help locate development away from areas at risk.</p>	<p>Noted.</p>
		<p>Countryside policies</p> <p>In draft policies C2 and C3, Natural England would like to see reference to the need to ensure that proposals for recreation, leisure, and economic development in the countryside „retain and enhance green infrastructure and biodiversity“.</p>	<p>This is considered to repeat other policies within the Plan and is partly covered by Core Strategy Policy CS4.</p>
		<p>Biodiversity policy</p> <p>Natural England supports draft policy BD1: Protected Species and Wildlife. Natural England would like to see reference to the mapping of the Boroughs ecological networks in the Plan in order to aid their preservation, restoration and re-creation.</p> <p>Footnote 102 should also refer to the Solent Waders and Brent Goose Strategy (2010).</p>	<p>Noted. This has been included within the revised Green Infrastructure section.</p>

ID	Respondent	Comment	Proposed Council Response
REF 70 Cont .		<p>Monitoring</p> <p>Chapter 16 to the draft Plan sets out the Councils proposed monitoring framework for this Plans policies.</p> <p>In relation to the proposed targets and monitoring indicators for draft policy BD1, we would add the following comments:</p> <ul style="list-style-type: none"> · The Net loss of local nature conservation sites as a whole is not a useful indicator. The net loss of local nature conservation sites due to development may be an appropriate indicator. · A „positive“ indicator around the creation of Biodiversity Action Plan (BAP) habitat, including habitat creation through development, could be included; · Alternatively there could be an indicator which captured the number/proportion of planning applications which provided a net gain for biodiversity. 	<p>Noted. An indicator for the number of planning applications which provided a net gain has been added.</p>
		<p>Habitats Regulations Assessment (HRA) report, Screening Statement dated October 2012</p> <p>Based on the information provide d, Natural England concurs with the conclusion of the Habitats Regulations Assessment (HRA) report (Screening Statement dated October 2012) as set out in para E3.1 with one exception as set out below. We await the revisions to the Local Plan part 2 incorporating measures and or additional information to allow the HRA based on it to conclude that the plan will have no likely significant effect.</p> <p>The exception to this is policy CM2 New Moorings. This policy has the potential to have a likely significant effect on at least one European Site. We advise that the rationale for screening this site out is explicitly states in the report.</p> <p>We would further add that the HRA has identified that there are a number of allocated sites within 500 metres of sites of high importance to Waders and Brent Geese. The effects on the allocations on these species should be considered at plan level, rather than delegated to development management level, so that a strategic approach to mitigation can be taken.</p>	<p>The revised HRA has been completed and recommended amendments to the Plan have been made.</p> <p>The Policy has been amended to reflect the findings of the HRA and specifically references that any proposals should not have an adverse impact on the Solent SPA.</p> <p>The DSP Plan now has a specific policy of Supporting Sites for Brent Geese & Waders and a specific policy on Recreational Disturbance on the Solent SPAs, which have</p>

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		<p>Finally, it is not clear within the HRA the exact nature of the mitigations, i.e. whether the matter can be left to development management stage, whether it can be addressed by changes to policy wording in the plan (including deletion of the allocation), or whether additional assessment is needed before determining what mitigation is required.</p>	<p>been developed in consultation with Natural England, RSPB and the Hampshire and Isle of Wight Wildlife Trust.</p>
		<p>Sustainability Appraisal</p> <p>Natural England has no comments to make on this document.</p>	<p>Noted.</p>
REF 72	Fareham Society	<p>Paragraphs 3.2 to 3.6 refer to "Urban Area", "Defined Urban Settlement Boundaries" and "Settlement Boundaries"; to avoid confusion only one term should be used. The meaning of para 3.5 is unclear; is it intended to refer to the inclusion of allocations for new development within the defined boundaries? If there are to be both Urban Area and Defined Urban Settlement Boundaries the latter should be shown on the Proposals Map.</p>	<p>Noted. This has been changed to "Defined Urban Settlement Boundaries" across the Plan to reflect the terminology of the Core Strategy.</p>
REF 72 Cont .		<p>Para 5.5 refers to the 2009 retail study not to the 2012 study. The latter states in para 6.49 in relation to comparison goods floorspace, that "based on current market shares, we estimate that there would be theoretical capacity to support an additional 15,280sq.m net by 2027". In paragraph 7.41 the 2012 study recommends "against large scale physical expansion in Fareham Town Centre. This is not reflected in the Local Plan which in paragraph 5.5 refers to accommodating between 10,000 and 24,000sq.m of net additional floorspace by 2026. The TC policies included in the draft plan could result in large scale physical expansion contrary to the evidence in the latest retail study.</p> <p>Policies TC9-TC11. The Town Centre schemes seem to be very ambitious, what is the likelihood that the sites will be developed in the lifetime of the Plan? The Society considers that there is a significant danger that if pursued in haste in constrained economic times, poor quality schemes will result. Economics eventually led the selection of what was not the best scheme for Market Quay; this resulted in poor architectural and design quality including materials and other detailing. For example, long distance views of the badly designed and executed rear elevation as seen from the Lower Quay and Salterns area. It appears that views from the waterside are not considered whereas those towards the water are.</p>	<p>Noted. This has been updated to refer to the 2012 Study. The reference from the study is a reflection of recommendations from within a separate BNP Paribas study related to the current economy. The conclusions of the GVA study do recommend against major expansion in the short term, but do recommend wider redevelopments should be encouraged where viable. It is important to note that the DSP Plan does not anticipate major retail growth over the Plan period.</p> <p>Noted. These are likely to be longer term schemes to be delivered in the latter part of the Plan period. Design, and especially the impact on neighbouring conservation areas, will be a key consideration.</p> <p>Views from the water should be considered in the same light as those to the water. One of</p>

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REF 72 Cont .		Para 5.33 should refer to the "listed" railway viaducts.	the benefits of the Market Quay site is its prominent location and redevelopment should take advantage of this. Noted. This has been amended.
		<p>Para 5.35, the wording of the last sentence should be altered to "include the museum with its coffee area and shop and the tourist information centre" for accuracy.</p> <p>Para 5.36. The Society disagrees that Westbury Manor would benefit from an alternative use and that other uses would make better use of its assets. The Museum is a public building to be enjoyed by residents and visitors. The fabric of the building is not subject to the sort of pressure that can occur with pubs or restaurants sometimes associated with Town Centre uses. Westbury Manor is a small elegant building of residential proportions and situated on quite a vulnerable site. The Museum use has been most appropriate for the building over many years; it is situated in the heart of West Street and centrally located to serve the whole Borough whose history is reflected in the Museum. Catering establishments are so often short term uses and can often be unoccupied for long periods. The Museum and the Tourist Information Centre function well together. The statement that "the existing uses are not intensively used, reflected by the fact that the building is shut on Sundays and Mondays each week" is misleading. The Library, Civic Offices and some other facilities like offices and the medical centre are not open on Sundays which is not mentioned in the text. It should also be made clear that none of the museums in Hampshire are open on Mondays due to current economic circumstances; this is unlikely to be a permanent arrangement.</p> <p>Westbury Manor is at a focal point in the Town Centre and features well in local festivals and celebrations. Its current uses display the local history of the area and also serve educational needs. It advertises local facilities to local residents and short and long stay visitors in an easily accessible location.</p> <p>Policy TC8, Westbury Manor, the final sentence should state that "Uses which do not provide an active frontage, such as residential or office space will not be permitted": the plans text must be a mistake.</p>	The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage Assets Policy on account of its location and its Listed Building status.
		Paragraphs 5.43-5.66. The Civic Area functions very well with its present cluster of uses, but would be improved if permeability can be achieved through to West Street	Noted.

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REF 72 Cont .		<p>to assist safer and convenient access to Ferneham Hall in the evenings. An arcaded glazed walkway through the shopping centre was suggested by the Fareham Society in the 1970s Town Centre Inquiry, where the disadvantages of the long east-west barrier formed by the shopping centre were discussed.</p>	<p>Market Quay is the most visually prominent location within the Town and is better related to the evening economy which would be mutually beneficial with a relocated Ferneham Hall facility. The Civic Offices will remain in situ, and the re-provided Osborn Road multi-storey car park will ensure a consistent flow of pedestrians still use the northern entrance to the shopping Centre.</p> <p>Initial capacity studies show that the Market Quay site is potentially large enough to accommodate a new entertainment facility that includes a library as well as additional uses with a multi-storey car park and public open space.</p> <p>The mix of uses has been changed to better reflect the information from the viability work. A combined library and entertainment facility at Market Quay would be beneficial in terms of efficiency of the new building as well as releasing a more substantial area of land in the Civic Area.</p>
		<p>In relation to Policies TC9, TC10 and TC11 it is considered that an arcaded walkway through the shopping centre should be a priority. The Society seriously suggests that the clumping together of most of the public buildings on the Market Quay site could be counterproductive. Having a more even spread of facilities in the relatively small area of the central town centre allows for a wider area of footfall benefitting all the shops both north and south of West Street, the new arcade taking the main flow but of course keeping the other entrances to the shopping centre.</p>	
		<p>The present Market Quay site is not large enough to adequately accommodate a replacement library of a similar floorspace, a suitable replacement for Ferneham Hall, a Museum/Arts Centre of comparable size to the existing facilities, generous parking to serve an entertainments venue including cinema and open space.</p>	
		<p>The list of principal uses seems to be totally unrealistic even excluding the additional uses that will be sought if they can be delivered. A reference to a library and entertainment/arts should be included in Policy TC9 Civic Area and the reference to library should be deleted from Policy TC10 Market Quay. There are advantages in having a venue for civic functions close to the Civic Offices.</p>	
<p>Policy DC3 states that the expansion of Portchester District Centre will be permitted but there is no explanation for the very significant expansion of the centre shown on the proposals map.</p>	<p>Noted. This has amended to explain the expansion of the Centre.</p>		
<p>Transport Policy TC6, New Community North of Fareham, is listed on Page 54 and was assessed in the Sustainability Appraisal, Appendix 4 page 4/6. What did this policy say and what has happened to the policy?</p>	<p>This was a typographic error.</p>		
<p>Para 7.6 the BRT Future Phases study should be available now to enable informed</p>	<p>The Policy is to protect the proposed route</p>		

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REF 72 Cont .		<p>responses to be made to policy T1 and the text relating to BRT.</p> <p>Para 7.7 states that "this critical east to west transport corridor" "acts as a bottleneck to many north to south travel movements on the peninsula." The north-south transport movements generally impede the east-west transport corridor. What evidence has been used to demonstrate that The Avenue acts as a bottleneck to many north to south travel movements on the peninsula and that justifies the duelling proposed? Para 7.12 and change to Proposals Map A79 propose the duelling of the A27; The Society believes that there is insufficient space for highway improvements at the Avenue primarily due to the presence of two important listed buildings; it is assumed that the policy and notation indicate that land outside the highway boundary is required, The Sustainability Appraisal assessment of policy T2, in Appendix III of the SA, should include a negative impact in relation to SA Objective 2, to conserve an enhance built and cultural heritage.</p>	<p>from development which would prejudice BRT. Whilst the final route of BRT has yet to be decided the Council is committed to supporting it as a general principle.</p> <p>Fareham Borough Council has been in continual dialogue with HCC, as the highway authority, who have provided comments on the Plan at all stages. There is a programme of works to improve the Avenue which is based on detailed transport assessments showing capacity issues at peak times.</p>
		<p>Para 7.14 refers to HCC's longer term aspirations for the Gosport-Fareham Link Road and the Western Access to Gosport. If there is any prospect of these being implemented in the period to 2026 more details of the schemes should be included in the text and preferably options shown on the Proposals Map. If there is no prospect of them being implemented in the period to 2026 the references should be deleted because they introduce significant uncertainty and are not helpful to planning. This is illustrated by the many comments on the Solar Farm application referring to the Stubbington by-pass.</p> <p>Policy T4 appears to conflict with the current "consultation" on the use of Yew Tree Drive.</p>	<p>Fareham Borough Council has been in continual dialogue with HCC, as the highway authority, who have provided comments on the Plan at all stages. However, the Council is only able to show final designations on the proposals map as opposed to "options". When HCC has a finalised layout and confirmation of works then land can be safeguarded and shown on the proposals map accordingly.</p> <p>Reference to the consultation is now in the Policy.</p>
		<p>Para 8.3 refers to the updated South Hampshire Strategy. This updated Strategy has not been subject to public consultation or independent scrutiny/examination and therefore cannot require the Borough Council to deliver a particular amount of housing through the Local Plan.</p>	<p>The South Hampshire Strategy has been developed by all Authorities within the PUSH region and is therefore an important contributor towards the Council's duty to cooperate. The Council must demonstrate that it has cooperated with neighbouring authorities during the production of the Plan, otherwise the Plan could be found unsound.</p>
		<p>Para 9.2 refers to the preparation of a Design Supplementary Planning Document. The Society seeks confirmation that this will include guidance for shop fronts.</p>	<p>Shop fronts will be covered in the Design SPD.</p>

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		Page 148, the Roche Court site should be added to the list of Historic Parks and Gardens; the completed research produced by Hampshire County Council and the Hampshire Gardens Trust is available.	Not all Historic Parks and Gardens (from the Gardens Trust list) are included in this list, mainly due to some of the sites not having gone through a complete investigation.
		<p>Policy C1 needs to be rewritten or the first two sentences should be deleted.</p> <p>Policy C2 needs to clarify that the type of leisure and recreation that may be permitted are those that require a countryside location and do not involve the building of large structures. It should state that development will be strictly controlled.</p> <p>Para 13.4 should refer to the area north of the M27 at Fareham as it provides opportunities for informal countryside recreation for a large proportion of the local population.</p> <p>Policy BD1, how will enhancements "be supported", by land or financial contributions from FBC?</p>	<p>This policy has been reworded.</p> <p>A number of leisure and recreation facilities are classed as "main town centre uses" and so are required by the NPPF to satisfy the sequential test. The Policy currently states that proposals will only be permitted where they do have a detrimental impact on the surrounding character. By definition this is unlikely to allow for large structures.</p> <p>The biodiversity action plan sets out targets for enhancements including methods for achieving these targets. The Plan supports this.</p>
		Changes to the Proposals Map A19 and A114 appear to be inconsistent in proposing overlapping notations for the Locks Heath Centre extension and a SINC. The Locks Heath Centre extension notation should be removed from the area of the SINC.	The SINC and other woodland areas form a useful function to the Centre by way of providing setting and context. The inclusion of land within the boundary of the Centre does not mean that these areas will necessarily be developed on, only to highlight the extent of the Centre and its setting.
		<p>The site options assessment should include a table of the assessment of all of the alternative sites considered as well as the sites that are now included in the Local Plan Part 2. It should properly record how the 61 shortlisted sites mentioned in para 1.2.4, were reduced to the shortlist of 34 to demonstrate that the decisions made have been informed by the SA process and how the assessment "scores" have been used to determine which sites should be included in the reduced list and which have not.</p> <p>The SA in paragraph 4.2.1 concludes that many of the sites have significant adverse impacts or unknown impacts on the sustainability objectives and states that these will require further detailed assessment. However, the draft plan relies on all of these</p>	The SA process is part of the site selection process. Other tests such as deliverability and viability were also undertaken and resulted in a number of sites being removed from the lists. A full assessment of each housing and employment sites, including reasons for their inclusion/exclusion can be found in supporting evidence such as the Strategic Housing Land Availability Assessment and Employment Land Review.

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		<p>sites to meet its housing and employment targets; what alternatives will be considered as potentially more sustainable sites? The assessment of policy TC2, widening of the A27, in Appendix III should include a negative impact in relation to SA Objective 2. What Policy T6 was assessed in Appendix 4? (See also comments on the Local Plan Part 2). What transport evidence has been used to inform the site assessments and are copies of this available.</p>	<p>All sites that have been considered to have a significant adverse impact have been removed as allocations and taken out of the housing supply.</p> <p>This was a typographical error.</p>
		<p>The "trendline" population projections used are totally inadequate as they do not relate to future house building. This is demonstrated by the forecast increase of only 684 for zone 8 which includes the NCNF and the increase of almost 12,000 in zones 3 and 4, Gosport in comparison with the HCC forecast of a reduction in Gosport's population of over 2,500 between 2011 and 2026. Is the NCNF not included in the forecasts in this document?</p>	<p>The Welborne section of the GVA retail study was done in tandem with the work on the rest of the Borough. The study tests the need for new retail floorspace on the basis of housing growth in the rest of the Borough.</p>
REF 73	Robert Tutton Town Planning Consultants Ltd on behalf of landowner	<p>22-26 Titchfield Road. I have been instructed to request that this site should continue to be treated as a "potential housing allocation" and should be shown in the SHLAA for December 2012 as "deliverable" during 2013.</p>	<p>Noted. This site will be analysed in the updated SHLAA.</p>
REF 74	Private Individual	<p>LOOKING AT THE PLANS THERE IS TOO MUCH HOUSING PLANNED FOR THE LOCKS HEATH / TITCHFIELD COMMON AREAS. WE ARE ALREADY UNABLE TO COPE WITH THE VOLUME OF TRAFFIC (THE MOMENT THERE IS ANY KIND OF PROBLEM AT JUNCTION 9). THIS MUST STOP. UNLESS YOU BUILD NEW ROADS YOU ARE JUST MAKING EXISTING RATE-PAYERS LIFE MORE AND MORE UNACCEPTABLE WITH TRAFFIC JAMS / QUEUES IN THE RUSH HOUR. JUST WHOM DO LOCAL COUNCILLORS THINK THEY REPRESENT WHEN WE SEE OUR LOCAL COMMUNITY BEING DESTROYED IN THIS WAY?</p>	<p>Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network.</p> <p>The majority of allocations in the Locks Heath area are undeveloped housing allocations from the previous Local Plan.</p>
REF 75	Private Individual	<p>The "Plan safeguards land in certain parts of the Borough to allow for improvements to the road network". The (separate) STAG report primarily addresses improvements to the transport and access for the Gosport peninsula and for the development of</p>	<p>Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required</p>

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		Daedalus. These improvements are just as vital for the quality of life for Fareham residents. As well as safeguarding land for improvements to Newgate Lane, land must be safeguarded to build a Stubbington Bypass (as concluded in the STAG report). This must also take priority over any plan for a solar panel farm near Collingwood/Peel Common. Improved vehicular access is far vital for this peninsula and will improve the quality of life for more people than solar panels.	<p>the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. To date the County Council have not submitted a request to FBC for safeguarding of land for any potential route of the Stubbington bypass. Until this occurs Fareham Borough Council cannot allocate land within the Plan.</p> <p>The appropriateness of the location of a Solar Farm at Newlands Farm was assessed as part of the application that has subsequently been approved. Hampshire County Council were consulted as part of the application process and this issue was considered by the Fareham Borough Council Planning Committee in reaching a decision.</p>
REF 76	Private Individual	I am disappointed that there is no provision to improve public slipways. Easy access to the sea for all to make use of this free and wonderful resource, especially in the upper harbour areas, can be had for insignificant outlay.	The Council has had no submissions from landowners regarding the provision of new public slipways and is not in possession of any land suitable. Proposals for slipways will be judged on their own merits based on, amongst other things, ecological concerns.
REF 77	Private Individual	As a resident of the Western Wards for some 30yrs I am concerned about the number of sites identified for development in the Locks Heath/Warsash area. There appears to be no analysis of the cumulative impact of such developments on the local infrastructure. The roads are too busy (try and get on and off the M27 at peak times) and the local medical services do not have sufficient capacity (a doctor's appointment takes days if not weeks). The plan needs to acknowledge how the infrastructure will be developed in tandem with any extra housing.	The Council has consulted the infrastructure providers for the area and has not received any indication of extra service required to support development. The Council has limited ability to allocate additional sites to improve services and facilities unless an indication to do so has been provided by the relevant authorities. The Council will consult these bodies again to ascertain the requirements for provision with an emphasis placed on the cumulative impact of the development on the locality.
REF 78	Private Individual	It would appear that it is intended that the Southerly portion of the land (at the top of the King George V Recreation Ground/Amenity Greenspace) would be accessed via	Whilst the proximity to the school will be a consideration of any access point, it does not

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		<p>the portion of land to the side of the Recreation Ground giving access to potentially 20 houses. In this modern age it is reasonable to assume that would be access for residents owning some 40 vehicles. Access required by say 40 adults and 50 children. This area is also practically opposite the Locks Heath Primary and Infant School and would be a potential bottleneck at the beginning and end of the School day. That portion of Warsash Road is already subject to much congestion and I would suggest that the extra numbers of vehicles will be a potential hazard to parents/guardians collecting or delivering their children to the School. The access for the Northern portion is considered as accessible via Raley Road. Again I would question the viability of this suggestion. A site visit to Raley Road at times from 8:30 to 9:15 am and 2:45 to 3:45 pm is required. This is at present used as a parking area for parents/guardians who are delivering or collecting their charges who attend Locks Heath Primary and Infant School. The extra vehicular activity at the top end and bottom end of Raley Road will be a difficulty at these times. Exiting from the southern end of Raley Road is already difficult at the best of time, as it in effect is part of the cross-road between Raley Road, Warsash Road (East), Fleet End Road and Warsash Road (West).</p>	<p>mean that a suitable solution cannot be found. The implications of the residential units on existing movement patterns will be considered at an application stage. However, the Council does not consider that peak hour parking and congestion issues caused by the school to predetermine the ability for new homes to be built.</p>
REF 79	Private Individual	<p>I have read that presently there are over 2000 people in Fareham on the waiting list for council housing (social housing) A target of just over 1000 houses by 2026 seems totally inadequate especially in the current economic climate when more people will lose their jobs and their homes.</p>	<p>The DSP Plan does not take into account proposed development at Welborne which has the potential to deliver substantially more affordable housing. The Council will continue to look to encourage affordable housing over and above the sites within the Plan where appropriate sites can be found.</p>
REF 82	Private Individual	<p>This development must leave sufficient Green Gap between it and Wickham and Knowle. This Green Gap to be contained within the Fareham boundary and not rely solely on land within the Wickham boundary.</p>	<p>This issue will be covered in the Welborne Plan.</p>
REF 83	Private Individual	<p>Whilst I welcome development in the centre, including a large supermarket (which is well needed and overdue as Co-op cannot cope with demand), and a sports centre and swimming pool that also welcome in the area, I am concerned that it is at a cost of ALL the green parkland (except woodland) in the centre. There is nowhere else in the immediate vicinity to walk dogs, and the woodland is not safe at night time and the dark winter evenings for female sole dog walkers. Dogs need somewhere to run, and also we do not want the paths in the area littered with dog foul. I am a dog owner so this is of concern to me. I appreciate some of the land must be built on for</p>	<p>Our research shows that the Western Wards, in general, has a good supply of open space. However, the importance of Greenspace near the District Centre and amongst residential properties cannot be underestimated. To that end the open area of greenspace to the north of the Centre and the woodland adjacent to Lockswood Road have been now been</p>

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		the purpose of the proposed developments, but not all of it leaving nowhere for dog walkers, children to play, etc.	excluded from the boundary of the District Centre and will remain as protected open space.
REF 84	Private Individual	I would be interested to learn whether the council would consider taking on extra areas of public open space if there was a deficit in a particular area? There is a specific area of public open space which I would like to refer to. I live in Collingworth Rise in Park Gate, and currently I am 1 of 75 units which has to pay for a private maintenance company (Meadfleet) to maintain the open space, for this we have been contracted into a restrictive deed of covenant, which was agreed by the council in the Section 106 when the estate was built. However, since then a new larger Wimpey estate has been added on to the area surrounding Red Oaks Drive. Accompanying this is a stretch of public open space maintained by the council, which sits directly next to and in fact flows into, the same stretch of grass which we are having to pay for. I don't want to sound like a disgruntled customer, but I do find it unfair that the surrounding areas of housing will benefit from the use of the open space in Collingworth Rise, and yet we are having to privately fund it. As the Council are maintaining the adjoining land, would it not be possible for them to also undertake the maintenance of our open space? There appears to be a lack of green space in the Park Gate area, so I was wondering if there was any way this would be possible in the future? Any information would be great help.	Public open space is not determined by ownership but by accessibility. Given that the land at Collingworth Rise is publically accessible it is still classed as public open space and therefore Council ownership would not improve the deficit in open space within Park Gate. Open space maintenance is dealt with by the Council's street scene department but they are unlikely to maintain space that is privately owned. Consideration of whether there would be community benefit to purchasing the open space at Collingworth Rise would be given by the Council's Leisure and Community service.
REF 85	Robert Tutton	The requirement for a legal agreement to be entered as a pre-requisite to the grant of permission for a detached annexe does not accord with the advice set down at paragraph 12 of Circular 11/95 - 'The Secretaries of State consider that in such cases, the local planning authority should impose a condition rather than seek to deal with the matter by means of a planning obligation'. A policy that does not accord with national government policy is, by definition, 'unsound'.	Noted. Text amended to read: '....a planning condition will be imposed to require.....'
REF 86	Private Individual	Living close to the Locks Heath Centre (High Oaks Close) we welcome a new food store and leisure centre but are concerned about the increase in traffic this will bring. However, our major concern is that there is NO KFC or any other brand of drive through restaurant allowed on the site. We already have a rat/pest problem on the boundary of the Genesis Centre and the west facing side of High Oaks Close. Of the options being proposed we most welcome 1A and 2A. Well Done to the Council!	The new uses are likely to generate increased traffic, however, by focussing additional uses in one location it increases the likelihood of linked trips. The District Centre is centrally located and has reasonable public transport links and is therefore considered the most sustainable location for these additional uses. The previous application for a drive-through

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			restaurant on the site has an outstanding permission. Given that the proposal was started (ground works) the permission remains live. The Council has no control over the retailer who occupies the unit, only the type of use.
REF 87	Private Individual	Lockswood shopping centre is in need of updating and not just with a fashionable coffee shop in totally the wrong place and depriving other coffee facilities in the area of customers. We need: 1 Leisure facilities including a swimming pool. 2 A larger doctor's surgery with more medical facilities 3 A quality food supermarket as well as the Co-Op and Iceland. 4 Other quality shops so that the new Whiteley Centre does not take all the custom. 5 Rents and rates for these premises should be reasonable.	The Plan allows for the suitable expansion of the Centre to allow for additional uses to improve the overall vitality and to improve the current retail offer. The Council cannot control rents on the units within the Centre as it is privately owned.
REF 88	Private Individual	1) We did not request this development of the Centre, so why do we need it. The Centre has a good range of shops a Library and Leisure Centre already. It is a sensible size in keeping with the open feel of the surrounding area. 2) The development would result in the loss of two valuable open green spaces which are lacking in this area of the ward. A lot of people use these spaces for recreation regularly, especially in the summer. 3) The reason a majority of residents do most of their food shopping elsewhere is due to the Co-op being too expensive. 4) Why are you trying to take business away from the Fareham Centre shops?	The necessity for the expansion of the shopping centre is down to the current trend of shoppers in the Western Wards going outside the Borough for their shopping needs. The Centre was built in the early 80's and the Western Wards has seen substantial growth since which has put pressure on the Centre to grow. There is currently no public leisure centre in Locks Heath District Centre. The revised boundary of the Centre excludes the open space to the north of the Centre and the woodland area alongside Lockswood Road. These areas will continue to be protected open space. The Retail Study shows that a reasonable expansion of Locks Heath Centre will have a very limited impact upon Fareham Town Centre which is significantly larger with a far greater range of shops.

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REF 89	Robert Tutton Town Planning Consultants Ltd	The requirement for a legal agreement to be entered as a pre-requisite to the grant of permission for a detached annexe does not accord with the advice set down at paragraph 12 of Circular 11/95 - 'The Secretaries of State consider that in such cases, the local planning authority should impose a condition rather than seek to deal with the matter by means of a planning obligation'. A policy that does not accord with national government policy is, by definition, 'unsound'.	Noted. Text amended to read: '....a planning condition will be imposed to require.....'
REF 90	Private Individual	I have just spent several minutes fringing about trying to find the plan that you have told me about in a leaflet dropped through my door. Your link just leads to endless woffel & is so complicated that I am sure most of the voters will be put off. Is that the intention just to confuse us & steamroller through plans unopposed as usual?	The Council has made attempts to make the Plan clear and easily understandable. The web pages were designed to simplify the issues further. The Council ran a series of manned exhibitions and Council Officers are always willing to discuss any issues throughout the Plan making process. A key part of developing the Plan is understanding public views and opinions.
REF 92	Private Individual	Croft House, Redlands I suggest land adjoining Redlands Lane & The Avenue is considered for future improvement to the A27 junction. This could be achieved by allocating part of the plot to Highways improvement.	Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. They have not highlighted a need for additional land in this area, which would necessitate allocating Croft House for highway improvements.
REF 93	Robert Tutton Town Planning Consultants Ltd	Few development proposals would have no impact whatsoever on the sunlight, daylight, outlook or privacy of a neighbour and the requirement of Policy DG3 for there to be '...no unacceptable adverse impact' is too onerous - it would present Officers with no leeway in the exercise of their judgements. There needs to be room for a balance to be struck between the actual effect of the proposal and the perception of it by a neighbour, along the lines of Policy R/DP1 of the Gosport Borough Local Plan Review, which requires that 'There is no significant loss of amenity'. In my view, DG3 should be amended to read 'Development proposals must ensure that there will not be a significant loss of amenity to adjoining land or neighbouring development through loss of sunlight, daylight, outlook or privacy'.	The Council is comfortable that the current wording is flexible enough to allow for a judgement to be made. Development could conceivably have a detrimental impact on neighbouring development without being "significant" and this would make it difficult for the Council to apply this policy as a way of protecting residential amenity. Using the word "unacceptable" allows Officers to assess the impact on amenity in a qualitative way.

ID	Respondent	Comment	Proposed Council Response
		<p>This policy serves no useful purpose. Policy CS17 of the Core Strategy already requires that 'All development, buildings and spaces will be of a high quality of design' and the reference to '...the Design Supplementary Planning Document' is inappropriate, as it is yet to be produced. One is bound to pose the question 'Why is the prospective content of the 'Upcoming Design Supplementary Planning Document' not already set out in Chapter 9 of Local Plan Part 2 instead of needing to be a stand-alone document?</p>	<p>The Design SPD will be published prior to the adoption of the DSP Plan. This policy provides confirmation of the guidance that needs to be taken into account with every application.</p> <p>The Design SPD is likely to be too detailed to be included within the DSP Plan, which is already a significant document. There are a wide variety of issues and principles to cover that warrant a degree of detail that necessitates a separate document.</p>
		<p>No useful purpose is served by a requirement that a community or educational building is kept vacant for a whole year while 'effective' and 'continuous active marketing' is undertaken. Vacant buildings detract from the character and appearance of the locality, encourage vandalism and reduce civic pride. A marketing period of six months would normally suffice.</p>	<p>Community Facilities serve a useful purpose within neighbourhoods and settlements and are difficult to replace once lost. The Council wishes to ensure that all options for re-use of such facilities are considered over a reasonable period of time before allowing such buildings to be lost to other uses.</p>
		<p>One reads that the Community Facilities Needs Assessment for Portchester has been completed but its conclusions have not been recorded. One notes that the overall provision of community facilities in Crofton is 'excellent' and there are 'no further significant needs'. It is apparent that there is no direct need for residential development in Crofton to contribute towards the provision of additional facilities. One is bound to ask why the Needs Assessments for Phases 3,4 and 5 have not been completed, in order that they may play their part in the formulation of Chapter 10 and provide a district-wide perspective. It is simply not acceptable that the assessments for Titchfield, Western Wards and Whiteley will not be completed before 2015.</p>	<p>The needs assessments for Community Facilities are ongoing, and are being completed in stages. This approach allows for the findings of each assessment to be fully considered and for any relevant proposals/projects to be investigated appropriately. It is not possible to complete all assessments at the same time and it is not considered appropriate to delay the progress of the Plan to allow for these assessments to be completed. Community Facilities are included in the Council's CIL Regulation 123 list meaning that all new developments will be required to contribute towards such facilities, irrespective of location in the Borough.</p>
REF 94	Genesis Youth Centre	<p>I am a member of the Genesis Management Committee and a local resident and I am concerned that I cannot see where the Genesis Youth Centre is on any of the redevelopment plans. I sincerely hope that this facility will be retained for the young</p>	<p>The revised DSP Plan shows this site as a housing allocation. However the site will only be allowed to be developed once suitable</p>

ID	Respondent	Comment	Proposed Council Response
		people because it is a standalone facility with a valuable music recording studio. There is no way that these facilities could be subsumed into either a Leisure Centre or Community Centre. In the current climate where young people are continually being marginalised I believe we have to provide them with what they need, in this case, by retaining the Genesis Youth Centre in its current building.	alternative arrangements for the youth activities that the Genesis Centre currently provides have been arranged.
REF 95	Robert Tutton Town Planning Consultants Ltd	The eternal difficulty with assessing a 'Windfall Allowance' is that it is influenced by many factors and therefore unpredictable. The only certainty is that windfall sites have fallen dramatically from 82 units in 2007/8 to 30 in 2008/9 and have since averaged just 14 a year ie less than half the average (of 31) that has been seen since 2007. It is convenient to attribute the decline to a 'downturn in the housing market' but there needs to be a recognition of institutional factors - discontinuation of the national indicative minimum density and the Executive Leader's Announcement re garden grabbing have raised the expectations of objectors and made it politically more difficult for Members to grant permission for residential infill within a fixed urban area, where opportunities inevitably reduce. The application of more strident 'quality' policies is increasing the challenge of securing windfall consents and reduction in contribution thresholds (especially the call for affordable housing) has all but killed off the 'small builder' locally. The reiteration of these factors in a document that is set to guide housing development in Fareham Borough for the next fourteen years is bound to depress the prospect for windfall development long-term - the industry will simply get the message that is not welcome in Fareham. The suggestion that windfall sites will provide twice as many houses per annum as have actually been permitted over the last three years is over-optimistic and unrealistic.	This is accepted. The windfall allowance has been amended to simply take account of historic trends, rather than include a predicted upturn.
REF 96	Private Individual	I would like to put my support forwards for plan 1c	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 97 Cont	Private Individual	Policy H9 of the Fareham Borough Local Plan review states. 'Where the annexe is detached from the original dwelling, a legal agreement will be sought to prevent the use of the annexe as a separate dwelling'. It is proposed to replace the word 'sought' with the word 'required'. I would submit that the 'requirement' for a legal agreement to control the separation of the annexe from the main dwelling is in contravention of the specific advice set out in paragraph 12 of Circular 11/95, which states that 'It may be possible to overcome a planning objection to a development proposal equally well by imposing a condition on the planning permission or by the entering into a planning obligation under section 106 of the act...' It is considered by the Secretaries of State that in cases such as these, the Local Planning Authority should impose a condition	Noted. Text amended to read: '....a planning condition will be imposed to require.....'

ID	Respondent	Comment	Proposed Council Response
		<p>rather than deal with the matter by the imposition of a Planning Obligation. A special case has not been put forward in para' 8.37 of the Part 2 document to explain or justify why an annexe within the Borough Of Fareham should depart from a rule applicable in the rest of the country and instead be the subject of a legal agreement. A proposed annexe must fall within a residential curtilage to qualify for consideration and special measures such as The Green Belt, National Park or An Area of Outstanding Natural Beauty do not apply to any part of the borough, which could justify a Special position. This matter can satisfactorily be dealt with by Planning Condition. A legal obligation is not necessary, and as such would fail the tests laid down in the National Planning Policy Framework. Policy H9 as drafted would not accord with paragraph 204 of the NPPF making it 'unsound' and an unnecessary departure from National policy. In order to align this policy with the National Guidance Circular 11/95 of the NPPF, it follows that Policy H9 should be amended to read 'Where the annexe is detached from the original dwelling, a planning condition will be imposed to prevent the use of the annexe as a separate dwelling', in the last two lines. Surely good effective planning must for the sake of consistency follow national guidance where it exists.</p>	
REF 98	Private Individual	<p>The Museum in Westbury Manor is in a good, accessible site in the middle of Fareham. It is free to everyone and gives a valuable insight to the history of Fareham and surrounding areas. A new site must be situated in the middle of Fareham and remain free to all. Westbury Manor, itself, is an historic building and it would be a shame if it is turned into a cafe or restaurant where access would not be free. Surely a better use could be made for it.</p>	<p>The policy regarding Westbury Manor will be removed from the Plan. The building is owned by FBC and as such a degree of control over any future use (should the current use relocate) already exists. The building is also covered by Town Centre policies and Heritage Assets Policy on account of its location and its Listed Building status.</p>
REF 99	Robert Tutton Town Planning Consultants Ltd on behalf of Merjen Engineering	<p>This site is within safe and convenient walking distance of Portchester railway station, is at the confluence of several east-west and north-south bus routes and has a subway link to Portchester district centre. It is one of the most sustainable locations in Fareham Borough, yet only five dwellings are proposed to be erected on it, which would represent a density of just 22.7 dwellings per hectare. One is reminded of Fareham Borough Council's opinion recorded at paragraph 6.41 of the Fareham Borough Local Plan Review that (even) '..a density of 25dph is relatively low and would not make the best use of sites or achieve a more sustainable pattern of development'. The allocation of this site for residential (re)development is most welcome but a greater number of dwellings (eg 16-20 one/two bedroomed flats) should be promoted, in order to fully realise the potential of this highly-sustainable</p>	<p>The independent viability study undertaken by Knight Frank showed the site to be unviable. Therefore the site no longer forms part of the housing supply.</p>

ID	Respondent	Comment	Proposed Council Response
		location.	
REF 100	Private Individual	Extra car parking will be required as there are not many free spaces at weekends. with more leisure facilities promised as well as more shops and with many new houses in the pipeline, people will not keep coming if parking is difficult.	The policy for Locks Heath Centre specifically states that any redevelopment must include sufficient parking for existing and new uses. This was passed on to the consultation regarding the Locks Heath District Centre masterplan. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 101	Private Individual	I do not see anything to be gained by losing the co-op to more small businesses - we have adequate small shops and too many will fail if plan goes ahead. it will be a great asset to the area to have a new leisure centre and pool.	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 102	Private Individual	My view is that strong consideration should be made to improve the infrastructure of the locks heath area before any medical facilities are bursting at the seams. There are plans to build more housing in the area with the resulting demand of facilities.	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 103	Private Individual	Option 1C: seems to be the better option. Concerns: LOSS of play areas for children. Kids need somewhere outside and FREE to play and kick a ball around. The loss of a PUB for those who enjoy a local. Whether the road system in the area will cope. Parking is a nightmare already, particularly at the weekend, will there be enough? On the PLUS side a swimming pool is LONG overdue!!	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan. The open space to the north of the Centre and the wooded area adjacent to Lockswood Road are now excluded from the boundary of the Centre and protected as open space.
REF 104	Private Individual	Locks Heath Option 3B is my preferred option	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 105	Private Individual	Locks Heath Option 3B is my preferred option	Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.
REF 106	English Heritage	English Heritage welcomes and supports B), although would prefer to see a reference to the scale and character of the Town Centre in the associated objectives. English Heritage also welcomes and supports the principle of C) and the associated objectives, although would prefer C) to read "Protect and enhance its important natural, historic and built environments, its heritage assets, its setting and its public	The current wording is considered adequate in explaining the vision and objectives for the Town Centre. Scale is covered in B) whilst the built environment is covered in C).

ID	Respondent	Comment	Proposed Council Response
REF 106 Cont .		spaces.....".	
		The policy should include reference to the character of the town centre, as a supplement to the second bullet point (e.g."Is of a scale appropriate to its location both in terms of design, so that it respects and harmonises with the character of the town Centre, and floorspace so that it does not adversely influence....." and/or including a reference to DG1 in the third bullet point.	This is covered by the design policies in the Plan and will be covered in more detail in the upcoming Design SPD. The Plan should be read as a whole and cross-referencing is not necessary.
		English Heritage supports the point made in paragraph 5.19.	Noted.
		Without necessarily endorsing the suggestion of relocating the museum, English Heritage does wish to see this fine building retained in an active but sensitive use. English Heritage welcomes and supports the criteria set out in Policy TC8.	Noted.
		English Heritage welcomes the reference to the Osborn Road and High Street Conservation Areas in paragraph 5.43, 5.46 and 5.47.	Noted.
		Masterplans for the Civic Area and Market Quay should contain design guidelines to ensure that any new development respects and harmonises with the existing attractive character of the town centre. English Heritage would welcome the opportunity to be engaged with the preparation of these masterplans.	Further detailed work will be required on the Town Centre Central Area (which includes the Civic area and Market Quay) and the Council will seek to engage with all relevant bodies during this process.
		English Heritage welcomes the acknowledgement of the High Street Conservation Area in paragraphs 5.77, 5.79 and 5.80 and the requirements in the latter two paragraphs to retain the historic development patterns, scale and plot division and for careful design to ensure that the scale and grain of new development is suitable in the context of the High Street Conservation Area. However, these requirements should be included within Policy TC14.	This site is now considered purely as a housing site and has its own site brief. This includes the following text "Any development will need to be subject to careful design to ensure that the scale and grain of development is suitable in the context of the High Street Conservation Area".
		English Heritage welcomes the recognition in paragraph 5.82 that the site at Maytree Road does not contribute to creating a high quality townscape. However, ideally Policy TC15 should require new development on the site to positively contribute to a high quality townscape.	This is considered to be adequately covered by the urban design policy and upcoming design SPD. All development should respond to the character of its surroundings.
REF 106 Cont .		English Heritage welcomes the recognition in paragraph 5.97 of the scope for the development of the site at the corner of Trinity Street and Osborn Road to bring significant townscape benefits. However, ideally Policy TC17 should require new development on the site to bring those significant townscape benefits.	This is considered to be adequately covered by the urban design policy and upcoming design SPD. All development should respond to the character of its surroundings

ID	Respondent	Comment	Proposed Council Response
REF 106 Cont		<p>I have not visited any of the proposed housing sites but have checked each one against our records of designated heritage assets. Only the sites at the Hinton Hotel, Catisfield, Seaeeye House, Lower Quay and Fleet End Road, Warsash appear to be likely to affect designated heritage assets (the Catisfield and Titchfield Abbey Conservation Areas, the Town Quay Conservation Area and the Grade II listed Ropewalk Cottage, and the Grade II listed Jolly Farmer public house respectively). (Reference is made to a Heritage Statement addressing the impact on the listed building for the site at Land off Church Road, Warsash, but our records show no statutorily listed building adjacent to this site). English Heritage welcomes the requirements that any development at the Hinton Hotel should be informed by the character of the Conservation Area and for the planning application to be accompanied by a Heritage Statement that addresses archaeology; that any development at Seaeeye House should take its lead from the scale, form and materials of the nearby buildings, particularly the listed cottage and generally be sympathetic to the character of the Conservation Area and the setting of the listed buildings; and that any development at Fleet End Road should not adversely affect the setting of the listed building and for the planning application to be accompanied by a Heritage Statement that addresses archaeology and the impact on the listed building. English Heritage also welcomes the requirements for planning applications for a number of the other development sites to include a Heritage Statement that addresses archaeology.</p>	<p>The Hinton Hotel site now has a planning permission, whilst Seaeeye House has been removed from the Plan for viability reasons.</p> <p>Reference has been made in the site brief for Fleet End Road to the setting of the listed Jolly Farmer pub.</p>
		<p>English Heritage welcomes the recognition in paragraph 8.36 of the potential for external alterations to a building or its curtilage/setting to meet the needs of certain forms of development may be detrimental to the character of sensitive locations such as conservation areas.</p>	<p>Support. No change required.</p>
		<p>English Heritage queries whether the policy as it stands really adds anything to Core Strategy Policy CS17, given that all new development within the Borough should be consistent with the principles set out in this policy anyway. However, we consider that the Development Sites and Policies DPD should contain a policy on design, which should set out more detailed principles than are set out in Policy CS17, including a reference to respecting the historic environment and heritage assets within.</p>	<p>Fareham Borough Council has decided that a design SPD is the most appropriate method for providing further guidance on the principles established through CS17. By producing an SPD the Council can produce far more detailed guidance than could be achieved within a policy in the DSP Plan. DG1 is therefore required to provide a link to the new SPD.</p>
		<p>The National Planning Policy Framework requires Local Plans to set out a positive</p>	<p>This section has been re-written with these</p>

ID	Respondent	Comment	Proposed Council Response
		<p>strategy for the conservation and enjoyment of the historic environment, a clear strategy for enhancing the historic environment and strategic policies for the conservation and enhancement of the historic environment. The Core Strategy relies on PPS5 but this approach of relying on national planning policy guidance is no longer sufficient given the requirements of the NPPF. It therefore falls to the Development Sites and Policies DPD to fill this gap in order for the Local Plan to be consistent with the NPPF. English Heritage therefore welcomes and supports the comprehensive chapter on Heritage and Conservation and Policy HN1. However, we can suggest some improvements. The text on Sites of Archaeological Importance (which should ideally be Archaeological Significance) could be strengthened as suggested by Hampshire County Council's Senior Archaeologist. English Heritage also considers that the Council needs to acknowledge that sites that are demonstrably of equivalent significance but not designated should be subject to the policies for designated assets, in accordance with paragraph 138 of the NPPF. Accordingly, we suggest amending Policy HN1 as follows: "In considering the impact of proposals that affect the borough's heritage assets the Council will i) give great weight to the conservation of designated and nationally significant heritage assets'. In addition, evidence and information about the significance of the historic environment gathered as part of development management should be made publicly accessible, and this requirement should be incorporated into the policy. English Heritage would like to see a reference within the policy to the measures the Council may take with respect to the heritage assets at risk in the Borough. Reference should also be made within the policy to Conservation Area Appraisals and Management Plans being used to assess planning applications within or affecting conservation areas.</p>	<p>comments in mind.</p>
REF 107	Private Individual	<p>I think that the proposed development is a fantastic idea for Locks Heath. The area has been in desperate need for a swimming pool for quite some time. The new pool will give the area a real community feel and excellent for the youngsters. It will also be great for reducing the carbon footprint of the area, as at the moment we travel quite some distance to use leisure facility's. Overall I would be happy with any of the proposals as long as the development could start quickly. However, my preferred choice would be option 1a or 1b - I feel this makes very good use of the woodland space and the service roads are still available for delivers to the food stores - without altering the traffic flow..</p>	<p>Noted. This was passed on to the consultation regarding the Locks Heath District Centre masterplan.</p>
REF	Private	<p>The proposed development is a great idea, the addition of a swimming pool will be</p>	<p>Noted. This was passed on to the consultation</p>

ID	Respondent	Comment	Proposed Council Response
108 REF 108 Cont	Individual	fantastic for me and my family (we all swim at least twice a week!) The extra shops will also allow us to do less travelling, saving money on fuel, reducing our carbon footprint and keeping our expenditure within the local area. My preferred option is either 1a or 1b - both of these options seem to preserve the existing natural surroundings and make use of a larger car park (I can see this as an advantage)	regarding the Locks Heath District Centre masterplan.
REF 109	Private Individual	Well presented with helpful explanations from friendly staff. Reassured by the strong defence of the strategic gap but slightly surprised to be told that a solar farm was a farm and not an industrial site. Not what most people think of a farm and nor what most people who enjoy what little countryside we have left actually want. Once lost we will never get back this part of the strategic gap.	Noted. The purpose of the strategic gap is to prevent coalescence. Any proposal for development in the strategic gap should not diminish the visual or physical integrity of the gap, as set out in Core Strategy policy CS22.
REF 110	Private Individual	I'm glad to see the improvement plan. The plan would benefit from closing West Street between Osborn Road South and its junction with Hartlands Road to all traffic other than buses, taxis, cycles and pedestrians. Traffic that currently sneaks through from the Quay Street roundabout to the Station Roundabout would be stopped and the whole environment would improve greatly. Access to Trinity Street would continue from the West and traffic would use the bi-pass to get there. Access to Westbury Manor and Westbury Road would be retained as would access only to Western Road, Queens Road and Kings Road. This would also reduce the flow of traffic onto the Quay Street roundabout from Portland Street and the congestion on the Station Roundabout since there would be less traffic exiting West Street going West. This would cost very little and would be popular with Town centre users, buses, taxis, cyclists and pedestrians	Hampshire County Council is responsible for the highways in the Borough. The Borough Council can only allocate sites or put forward proposals that relate to the highway that have been put forward by Hampshire County Council. The County Council are considering ways of improving traffic flows around the town Centre and have been in continual dialogue with Fareham BC during the production of the Plan.
REF 111	Private Individual	All development must be contained within Fareham and there should be a good sized green gap between all development and the boundaries of Knowle and Wickham.	This comment has been passed on to the Welborne team.
REF 112	Private Individual	After an hour looking at some of the documentation with the aim of giving my opinion I find the diversity and detail of every page and the number of links precludes all but the most educated and time rich from being able to form an informed opinion. Could you provide a straight forward overview no more than 10 A4 pages and those who need every detail in legaleese can look further.	The Council attempted to make the Plan as simple to understand as possible. Dedicated webpages were produced to provide the basic information included in the Plan, without the need to read through the whole document. This basic information was also available on exhibition boards at numerous exhibitions held across the Borough. Council Officers are always available to discuss and explain any

ID	Respondent	Comment	Proposed Council Response
			aspect of the Plan which is difficult to understand.
REF 113 REF 113 Cont .	Private Individual	<p>Before any further building development takes place within the borough a clear and detailed traffic assessment should be completed to ensure that sufficient road access and public transport routes are available to accommodate the additional traffic that building development of any kind will generate. Motorway access to Fareham is currently abysmal. The Delme Roundabout is totally jammed at peak times and the Fareham A27 bypass as far as Fareham College is ridiculous. Traffic along Highlands road is a snail pace and residents have been denied a pedestrian crossing at Blackbrook Road. The footpath along the north side of A27 between Segensworth and Highlands Road should be upgraded to a cycle route as this road is very dangerous for cyclists. Negotiations with Gosport and Portsmouth to develop a comprehensive plan for integration of Public Transport within the three areas with a view to encouraging residents to actually use public transport should be carried out. Buses are currently perceived as a last resort choice mode of transport to be used only in emergency. There are three areas which could be improved by Council intervention: Advertising public transport to improve it's image and make it into a service which is a fashionable thing to access Integration of fares so that eg. The price of the Rapid transport bus and the Gosport ferry are linked so that only one ticket is needed for both. Negotiate with the bus companies to reduce fares which in the long term will bring them higher profits as buses will be full. Highlands to Fareham single is just under £3. The other morning at 8.20 there were seven passengers from Highlands to Fareham. No profit whatsoever would have been made on this route. If buses were say half price before 9am commuters may be much more inclined to travel by bus. but this must be ADVERTISED. The bus companies just do not advertise enough and in my opinion they are coasing along with their government subsidies for concessions. I am also dismayed that there is no bus service to the new hospital at Park Gate. Services must be provided for people to access them and Council's need to make this investment into the future.</p>	<p>Hampshire County Council are responsible for the highway network and do have an ongoing programme of improvements. Where required the Council has highlighted land to be safeguarded in the DSP Plan for highway purposes. It is not within the remit of FBC to improve the highway network.</p> <p>Transport for South Hampshire and Isle of Wight is currently considering the feasibility of integrating tickets between different modes of public transport across South Hampshire.</p>
REF 114	I Hammond & Son Limited	<p>The owners object to inclusion of site 93 Hammonds as an existing employment site to be protected on the grounds that this is not an employment site it is, and has long been, in mixed use. It was part of Hammond's Nurseries consisting of cultivated land, barns, outhouses and workers' cottages. The site is now in rented residential and light industrial use. This site is small and does not produce sufficient income to develop and improve the industrial units. As a result, as noted in the Employment Land Review, the employment element of the site is 'Low intensity industrial area</p>	Noted. This site has been removed from the list of protected employment sites.

ID	Respondent	Comment	Proposed Council Response
REF 114 Cont .		typified by small single storey units in three rows. Common parking areas are poorly kept and buildings are of generally low quality' and categorised as suitability grade D. This site should not be designated as mixed use not employment use.	
		The landowners of part of the land east of Newgate Lane object to allocation of the strategic gap between Stubbington and Fareham on the grounds: a) There is no mention of strategic gaps in the NPPF therefore this is no longer a planning policy option, so from April 2013 policy CS22 will not be compliant with national planning policy. b) The work undertaken in the Fareham Borough Gap Policy Designation Review is flawed because it explicitly set out (Methodology 4.2 Analysis of existing gaps) 'to assess whether the existing designated gap areas are required to ensure the visual and physical separation of settlements'. It did not set out provide evidence as to why the gaps identified are needed to prevent coalescence, as instructed by the Core Strategy Inspector, and required in Policy CS22 'in defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining physical and visual separation' It is very hard to see how the gap functionality assessment matrix: physical and visual separation used in this review could reach this conclusion since it assesses (on a five point scale): - Low density of existing buildings (many buildings =poor) - Significance of distance of gap at narrowest point (short distance=poor) - Few past planning applications (many=poor) - Coherent apparent ownership pattern (large number=poor) - Clearly defined coherent boundary (distinctive boundary feature such as road =high) - Density of vegetation screening urban edge (edge study) - Sense of separation due to topography and density of vegetation across gap (perception in the field) As a result the gap identified as 'strategic' between Fareham and Stubbington varies between 0.57 and 1.1 km and merely represents the gap that currently exists. c) Fareham and Gosport already join and the land east of Newgate Lane has v ery good public transport connections (bus and rapid transit) making this a very sustainable location for development so there is no justification in seeking to include this land in the 'strategic' gap. As identified in the gap functionality assessment it would be better if the settlement boundary was Newgate Lane, and physical separation from Stubbington would remain considerably more than 0.57km.	<p>The principle of Strategic Gaps has been established through the Core Strategy. Although the NPPF does not specifically reference Strategic Gaps, this is not, in itself, justification for their removal from the Plan.</p> <p>The Gap Review analysed all gaps in the Borough to establish whether the existing boundaries were appropriate. By definition, the study identified areas where gaps are not required, hence why some areas previously designated as gaps are no longer allocated as such.</p>
		The landowners of part of the land east of Newgate Lane object to safeguarding land along Newgate Lane on the grounds that the Council has not considered alternatives to this road widening that would provide betterment. Specifically the Council has not considered allowing development to the east of Newgate Lane to enable provision of	Hampshire County Council are responsible for the highways in the Borough. The Borough Council can only allocate sites or put forward proposals that relate to the highway that have

ID	Respondent	Comment	Proposed Council Response
		the originally safeguarded dual carriageway route. This is not a good long term solution and not a good use of public funds	been put forward by Hampshire County Council.
REF 115	Private Individual	<p>Having only just found out about the redevelopment we have major concerns over the long-term viability of such a project. We are not against regenerating the Locks Heath centre but do not believe your plans will achieve this objective. Your report states recent research was carried out. Who commissioned and carried out this research and when? Is this the same one as per the previous owners plans for the Locks Heath centre? As very local to the Locks Heath centre we nor our neighbours have been asked to participate in this research. Following the rejection of the KFC drive-through due to the strength of local opposition, how is the drive-through going ahead again? We asked to be notified when we objected to the plans on the internet of any further development on this and have heard nothing. With regards to the leisure centre and swimming pool we have "been here before" when the council wanted a private gym and a public swimming pool which had to be dropped due to lack of private interest. What evidence is there that the situation has now changed? If this is to provide for the increase in housing why is it not at Cold East as Sean Woodward told us was the preferred site when the Locks Heath centre was going to be redeveloped originally. The increase in houses are at Coldeast not Locks Heath centre! If these plans are implemented there will be an increase of traffic in and around the Locks Heath centre what studies have been done to show that the local road infrastructure can cope with this particularly with the completion of the development at Cold East? Traffic congestion is at an extreme in the area in the rush hour - encouraging more traffic onto already congested roads is not going to help this situation. There is insufficient car parking on your plans should these plans be successful. You mention the open-spaces and increasing community facilities but all the options remove the skate-board park which local young people fought hard to be implemented and does not appear to be replaced. We fear the removal of local facilities particularly for young people will increase anti-social behaviour. Do the owners of the site have plans to increase the security of the centre in-line with increased traders and leisure facilities? We do not need another supermarket in the same centre - where is the sense in having two supermarkets in one small shopping centre? Another supermarket will almost certainly kill off the local independent traders operating in the Locks Heath centre - we already have two empty units - and we fear the Locks Heath area will eventually become another Whiteley which ultimately closed and is to be rebuilt with a different focus. We are aware of plans drawn up by the existing supermarket - Coop -for the regeneration of the centre and whilst we still have concerns regarding the leisure centre we feel their plans are</p>	<p>This was passed on to the consultation regarding the Locks Heath District Centre masterplan.</p> <p>There is an outstanding permission for a drive-through restaurant on the site. Although a subsequent amended scheme (KFC) was refused on design grounds, the initial permission remains "live" due to ground work on site being started.</p> <p>There is evidence to show that there is genuine need for a swimming pool in the Western Wards. Both Coldeast and Locks Heath District Centre are being considered as options at the current time.</p> <p>The issue of car parking is noted and the policy in the Plan seeks to ensure that sufficient parking is provided to not only meet the needs of existing uses, but all additional uses as well.</p> <p>Noted. The Council agrees that the skate park is a well-used facility and should be retained.</p> <p>The GVA Retail Study shows that a high proportion of residents of the Western Wards currently do their food shopping outside of their Borough, Tesco Whiteley and Tesco Bursledon for example. To try and retain this trade within the local area the study recommends increasing the amount of</p>

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		better-suited to the needs of the community and Locks Heath Centre.	convenience floorspace in Locks Heath District Centre. The Plan does not dictate how this additional floorspace should be delivered, this could be via extensions of existing units or by new units.
REF 116 REF 116 Cont	Winchester City Council	Winchester City Council objects to the wording of Policy T4. Any decision about the use of existing highway links such as Yew Tree Drive should be a matter for Hampshire County Council as Highway Authority based on proper evidence. It is not appropriate to place planning policy restrictions on the use of existing public highway. The City Council believes that there is evidence to demonstrate that Yew Tree Drive could be made accessible for all vehicles with positive benefits to local traffic management. It is not necessary for this to be delayed until the link road to Whiteley Way in Winchester District is completed.	This Policy has been amended to allow for the permanent opening of Yew Tree Drive following the outcome of the current trial period.
REF 117	Sport England	Paragraph 74 of the National Planning Policy Framework gives special protection to both indoor and outdoor sports facilities. It states; Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. Whilst policy CF1 will give some protection to indoor community sports facilities, it may not be sufficient to protect all sports facilities, in particular those that are in private ownership. Sport England requests that the Council considers amending policy CF1 in line with the NPPF or creating an additional policy that will give greater protection to both public and private indoor sports facilities.	A new policy has been inserted to cover the specific issue of Sports facilities and pitches. It states that the loss of sports facilities and pitches will only be permitted where replacement facilities of suitable quality are provided on site, or at a suitable alternative location.
REF 118	White Young Green on behalf of Sainsbury's	On behalf of our client, Sainsbury's Supermarkets Ltd, we would like to make representations in relation to the above document. In summary, our client would like to support the proposed extension to the existing Fareham Town Centre boundary, and recommend that the Town Centre boundary be extended further to include the existing Sainsbury's store at Broadcut. Sainsbury's at Broadcut functions as a main town centre use (retail) which contributes to the town's competitive retail offer and promotes linked trips to the Town Centre, encouraging sustainable shopping patterns. The Fareham Local Plan acknowledges the town's vulnerability as a centre	The Council does not consider Broadcut to be a functional part of the Town Centre due to its distance from the core of the Town Centre and the presence of the A32 which acts as a clear visual and physical break. The opportunity for linked trips between Broadcut and the Town Centre is considered to be minimal with visitors likely to drive to both rather than park at one

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		<p>given its close proximity to major shopping destinations such as Southampton, Portsmouth, Winchester and Chichester and recognises the importance of ensuring a wide range of services for existing and future residents. Furthermore, the Sainsbury's store is well connected to the proposed Town Centre, with a pedestrian crossing at Wickham Road linking the two. Sainsbury's at Broadcut makes a positive contribution to competition and consumer choice in the Town Centre as called for by Core Strategy Policy CS3 (Vitality and Viability of Centres), and should therefore be considered a functioning part of Fareham Town Centre.</p>	<p>and walk to visit the other.</p>
REF 119	Robert Tutton Town Planning Consultants Ltd	<p>One of the 'Core planning principles' set down in paragraph 17 of the National Planning Policy Framework is the promotion of mixed use developments, in urban and rural areas. Paragraph 4.11 of the Core Strategy records the intention that employment sites and areas will be reviewed through the Sites Allocations document but paragraph 4.6 of the document states that '.the focus will be on retaining B1, B2 and B8 uses in the first instance', unless and until a 'reasonable period of time' has elapsed for a building or site to have been vacant before an alternative use will be considered. As drafted, Policy ED1 would act as an undesirable brake on the achievement of mixed use development. If a period of vacancy or non-use must be imposed, it should be six months rather than 12 or 18.</p>	<p>The policy has now been amended to allow for all alternative forms of economic development in the first instance, as opposed to purely B1, B2 and B8. However, the 12 month vacancy period is required before alternative uses, such as housing, should be considered in order to allow for all alternatives to be fully considered.</p>
REF 120	Robert Tutton Town Planning Consultants Ltd	<p>It is disappointing that, despite the promise made in paragraph 4.24 of the Core Strategy, the Older Person's Housing Strategy for Fareham has not yet been produced. Save for criterion (iv), the requirements for older people's housing is little different from the general population. Criterion (iv) is vague and gives no indication as to the circumstances in which a choice of tenures may be required - in reality, that matter should be left to the market to determine.</p>	<p>The need for older persons housing is noted within the DSP Plan. However, the overall figure for population growth, which (in part) forms the basis for the housing target, does take account of growth in those people living longer. It is, therefore, not considered appropriate to allocate additional sites specifically for elderly persons accommodation over and above the general housing allocations needed to meet the housing target</p>
REF 121	Roger Tym & Partners on behalf of New River Retail	<p>Roger Tym & Partners act on behalf of New River Retail (NRR), the owners of Locks Heath Shopping Centre, Fareham. On behalf of our client, we have considered the contents of the 'draft plan' consultation of the Council's Development Sites and Policies document ('the Plan'), and set out our comments below. Our comments solely related to Chapter 6 of the Plan, which sets out the Council's proposed policies for District Centres, Local Centres and Local Shops. Reflecting the</p>	

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REF 121 Cont .		<p>hierarchy of centres established in the Council's adopted Core Strategy, Locks Heath is identified as a second-tier 'District Centre', alongside Portchester and the proposed New Community to be developed to the north of Fareham.</p> <p>Paragraph 6.2 of the Plan makes it clear that the District Centres are expected to see expansion over the Plan period. This approach is reflected in Policy DS1, which supports the development of 'town centre uses' (such as retail) in Fareham Borough's defined centres, providing it is of a scale which maintains the current hierarchy of retail centres. This policy approach is supported.</p> <p>Paragraphs 6.7 to 6.9 of the Plan set out the context of the current performance of Locks Heath, identifying that the retail offer of the centre has remained largely static since its opening, despite significant residential expansion in the surrounding area, with further residential growth expected over the Plan period. Consequently, many residents of the local area are choosing to travel to other destinations for their shopping (paragraph 6.8); the Council is of the opinion that 'expansion and additional retail floorspace would help in bringing back trade currently lost to other locations outside of the Borough'.</p> <p>The Council identifies at paragraph 6.9 that suitable opportunities exist for the expansion of the Centre, although any expansion would also need to retain sufficient levels of parking.</p> <p>Paragraph 6.9 also identifies that a masterplan exercise will assess the feasibility of expanding the centre.</p> <p>Policy DS2 states that 'Locks Heath Centre will be expanded in line with an agreed masterplan in order to better meet the needs of the surrounding area provided that:</p> <ul style="list-style-type: none"> • Sufficient levels of parking are provided; • Accessibility to public transport; • An acceptable amount of public open space is retained in the vicinity of the Centre; and • Any expansion or new development has no adverse impact on the amenity of existing neighbourhood development' <p>The aims of Policy DS2 in respect of the future role and function of Locks Heath</p>	<p>Noted.</p> <p>Noted.</p>

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		<p>District Centre are fully supported by NRR, who look forward to working with the Council to deliver the objectives of the policy and the emerging masterplan.</p> <p>To this end, we have submitted detailed comments on the Council's emerging masterplan under separate cover.</p>	
REF 122 REF 122 Cont .	White Young Green	<p>The Policy makes no reference to the identification of sites for care facilities for the elderly, despite the fact that the Core Strategy Inspector's Report (Paragraph 36) acknowledged that there was insufficient provision for elderly person's accommodation such that he expected other local development documents to address this undersupply (over and above the provision made at Coldeast Hospital). The attached Statement sets out our client's proposals for addressing this issue.</p> <p>The Policy fails to identify sufficient open space to meet the natural greenspace deficiencies identified in the Addendum to the Fareham Borough Greenspace Study in 2010. There are existing deficiencies in Titchfield (8.4ha) and Catisfield & Heathfield (10.5ha). The attached Statement sets out our client's proposals for addressing this issue.</p> <p>The Policy fails to actively promote new uses for historic buildings that create an income to support their upkeep, such that local communities can access and enjoy these buildings. The attached Statement sets out our client's proposals for addressing this issue.</p>	<p>The need for older persons housing is noted within the DSP Plan. However, the overall figure for population growth, which (in part) forms the basis for the housing target does take account of growth in those people living longer. It is, therefore, not considered appropriate to allocate additional sites specifically for elderly persons accommodation over and above the general housing allocations needed to meet the housing target</p> <p>Noted. The revised plan set out two new areas which will help address the deficiency in certain areas in the Borough as well as allowing for future opportunities to come forward as and when they are identified. However the Council concedes that in certain built up locations opportunities for addressing identified shortfalls can be extremely limited.</p> <p>The Policy is considered to be flexible enough to allow for alternative uses as long as the heritage asset is not adversely affected.</p>
REF 123	Woodland Trust	<p>The Woodland Trust would like to see trees and woodland as a key element in the provision of new open space. The Case for Trees (Forestry Commission, July 2010) states: 'There is no doubt that we need to encourage increased planting across the country – to help meet carbon targets – and every tree can count towards those targets as part of a renewed national effort to increase the country's overall woodland canopy. But it's not all about carbon; there is a growing realisation among academics about the important role trees play in our urban as well as the rural environment. It has long been accepted and confirmed by numerous studies that trees absorb</p>	<p>Noted. Woodland and trees are considered a key element of the open spaces in the Borough. New development and new open spaces will be encouraged to include an element of trees.</p>

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REF 123 Cont		<p>pollutants in our cities with measurable benefits to people's health – such as reducing asthma levels. Yet trees also deliver a whole host of other extraordinary economic, environmental and social benefits.' Natural Environment White Paper: Protecting and improving our woodland and forests</p> <p>2.53 Trees, woodlands and forests have a very special place in English culture and have provided us with many of the essentials of life through history. Their health is essential for our wellbeing and prosperity. They shape our landscapes and street scenes. Our choices today will shape our future landscapes, prosperity and wellbeing. Our ambition is for a major increase in the area of woodland in England, better management of existing woodlands and a renewed commitment to conserving and restoring ancient woodlands. Forests and woodlands must play a full part in achieving a resilient and coherent ecological network across England.</p> <p>2.54 We want to create more opportunities for planting productive and native woodlands; more trees in our towns, cities and villages; and a much larger proportion of existing woodlands brought into active management. We also want to increase the use of sustainably grown and harvested wood products. Together, this will enhance the wide range of benefits that woodlands provide, including renewable energy and timber, new wildlife habitats and green space for people to use and enjoy, helping us to mitigate and adapt to the future changing climate. It will also increase resilience to climate change, pests and diseases, and help to halt the loss of biodiversity.</p>	
		<p>The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it matters (http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets). The recent UK National Ecosystem Assessment (http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx) said that “Woodlands provide the highest identified number of ecosystem services including regulating climate, air quality and water flows, providing timber and other wood products as well as a range of cultural benefits.” It is this multi-purpose quality of woodlands that make them so valuable to society. Consequently when considering mitigation (see later) it is this quality that</p>	<p>Noted. The retention of woodland is considered a key element in encouraging biodiversity in the Borough.</p>

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		makes it necessary to get the design, location and management of new woodland right to ensure the fullest expression of the potential ecosystem services that can be derived from woodland.	
REF 124 REF 124 Cont .	Private Individual	Having attended one of the Locks Heath Development Plan briefing/presentations in the Community Centre, I am now aware that there appears to be a linked, yet separate planning issue. This seems to be confined to the A27, south of the Holiday Inn roundabout. My property (319 Southampton Road), appears to be 'slap bang' in the middle of the subject area. Despite talking to numerous planning officials in the various council and highways departments I cannot find out any detail of related plans. I acknowledge that this must be a very early stage of the related planning process. However on the assumption that the November deadline for public comment applying to the Locks Heath Plan applies equally to the A27 development, there is little time for such comment e.g. How many landowners adjacent to the subject A27 know anything about the proposals. Obviously I am concerned that any proposal to widen the road will have some impact on my property as there appears to be no way that widening could be achieved within the existing boundary of privately owned land. There is presumably also a risk of planning 'blight' which could effect the sale of my property. I apologise for my lack of knowledge of the planning process and thanks in advance for any related information that you can provide.	This designation on the proposals maps has been removed given that Hampshire County Council are unable to confirm, at this point, what land will be required. To that end the Borough Council is not able to show anything on the proposals map.
REF 125	Private Individual	We need open space for children to play not all parents can afford to pay for swimming etc. It makes Locks Heath a nice place to live in with open space near to shops and library.	Noted. The policy for Locks Heath District Centre specifically mentions the need to retain as much open space as possible.
REF 126	Private Individual	The food store should not be moved. If the entrance is moved the existing shops will die. We don't need more shops. The existing ones are not fully used now. Green space must not be sacrificed for unnecessary new shops. What will happen to the public house? A swimming pool is urgent!	Locks Heath Centre has consistently had a very low vacancy rate which shows a need for more shops in this location. Our evidence shows that new convenience floorspace is required although the Plan does not dictate that this will be delivered in a new store, it could be delivered through extensions to existing buildings. The boundary of the Centre now excludes the green space to the north of the centre and the woodland adjacent to Lockwood Road. These areas are retained open space.
REF	Private	In an area with a large population, it is particularly important to maintain the gaps, and	Noted. A principle established in the Core

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127	Individual	to distinguish the settlement boundaries. Green spaces and biodiversity enhance the environment in which so many people are living.	Strategy was to prioritise previously developed land for new development, therefore protecting gaps and green spaces.
REF 128	Private Individual	It seems a site where many people walk and walk their dogs. They should be encouraged to register their footpath rights. Also it seems a very short term idea to possibly cover a potential school site with housing or development just became a new school is not justified now. It is such a built up area and population size and age range change over time. Think of all the school sports fields that now so many regret selling off.	The boundary of the Centre now excludes the green space to the north of the centre and the woodland adjacent to Lockwood Road. These areas are retained open space. Regarding the Heath Road site, Hampshire County Council have demonstrated that the site is not required for both the short and long term based on population projections which are based on predicted growth across the area.
REF 129 REF 129 Cont	Robert Tutton Town Planning Consultants Ltd	The Extension Design Guide started its life as a supplement to the Fareham Borough Local that was adopted in 1992, so its roots are in policy/design guidance that was formulated two decades ago; it cannot purport to reflect contemporary attitudes. In allowing Paul Southon's appeal against the refusal of application P/12/0484/FP re 51 Park Lane on 26th November, Inspector Evans opined that '...this somewhat dated non-statutory advice should not be rigidly applied'. Objection is raised to the intention set down in paragraph 9.2 of the Local Plan Part 2 to '...the upcoming Design Supplementary Planning Document' and that 'Proposals that do not adhere to the principles within them will be refused'. The quest for 'status by prior association' is unreasonable. The outdated non-statutory guidance of the EDG should form part of the submitted Local Plan Part 2, in order that its principles may be examined at inquiry prior to adoption. If quality of design is to take centre-stage in future planning decisions, its principles should be made the subject of transparent public scrutiny, not through the back-door procedure of a SPD, where the Borough Council is judge and jury in its own house.	The production of the Design SPD will include a period of public consultation in order to gain views from all interested parties. There are a wide range of issues covered under the term "Design" and the DSP Plan is not considered the appropriate location to go into the level of detail that is considered appropriate for these wide ranging issues. The basic principles for the Design SPD have already been through the examination process as they are established in Core Strategy Policy CS17.
REF 130	Martin Moyse	The Extension Design Guide is out of date. New design guidance should form part of the submitted Local Plan Part 2. It is not acceptable for such an important issue to be dealt with as supplementary planning advice instead of forming part of the statutory adopted plan.	The production of the Design SPD will include a period of public consultation in order to gain views from all interested parties. There are a wide range of issues covered under the term "Design" and the DSP Plan is not considered the appropriate location to go into the level of detail that is considered appropriate for these wide ranging issues. The basic principles for

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			the Design SPD have already been through the examination process as they are established in Core Strategy Policy CS17
REF 131	Private Individual	I do not think this site should be used for housing but as a local amenity such as a leisure centre/ swimming pool. With population increasing in future there will be demand for more school places and this land is centrally located for a new school which could double up as a local swimming pool/ leisure facility (which are lacking in the Western Wards). Ideally the land should be used as a park for local community to enjoy and would give cycle / pedestrian access to the Locks Heath Centre. A few years back I fought a campaign to stop houses being built there with Fareham Borough Council (all parties) agreeing with this. The Hampshire CC run by the Lib Dems at the time needed cash. This short term gain would have resulted in a long term pain to local residents with more congestion/ loss of wildlife/ loss of space to put local amenities in the future (which would safe guard much of the woodland/ open space compared to housing). The road nextwork in the area is on overload and will get worse when the Peters Road development completes and the effects of this are not known at the moment. I felt so strongly about this issue I even stood for election as an independent councillor with this piece of land as my main issue and I came 2nd thus highlighting local people feel the same way as me.	<p>Hampshire County Council has demonstrated that the site is not required for both the short and long term based on population projections which are based on predicted growth across the area.</p> <p>The space is privately owned and not publically accessible, therefore it cannot be considered open space although issues such as biodiversity and the protection of trees will be major considerations if a planning application comes forward.</p> <p>Hampshire County Council are responsible for the highway network and have been made aware of all potential residential sites. They have not raised an issue with the site being utilised for residential development.</p>
REF 132	Private Individual	As a home owner of Russell place we would like more information regarding the proposed plans. We already struggle to park and taking away our parking without a plan in place for us seems inconsiderate for those who have purchased their homes.	The site has been identified as a "Development Opportunity Area" as the wide expanse of surface parking and low level development is not considered to be the most efficient use of space. However, development is only likely to come forward through land amalgamation which will be at the discretion of all individual landowners, leaseholders and those with rights of access. The retention of suitable parking facilities for all existing, and any new, users remains a key consideration.
REF 133	Private Individual	Rear of 69 Botley Road Park Gate 0.3 hectares This area of land is low grade and edge of town, is of little value and is not an environmentally sensitive area but has the potential to provide great benefits in terms	The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will

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REF 133 Cont .		<p>of a specific location. The land is clearly on the very edge of the built-up area, rather than in a remote countryside location and is without means of public access and well suited in respect of both the district shopping centre at Park Gate and Swanwick Railway station – within easy walking distance of all amenities and makes a sustainable site for housing, employment and amenity: a place where residents might reasonably get to the shops, work and leisure by foot, bicycle and public transport rather than by car.</p> <p>The proposal is to re-align the urban boundary 75 metres to the west. This area is the pub garden and land used as domestic land at the rear of 69 to 73 Botley Road. They are bounded by the railway and motorway to the north and existing development to the south and east. The proposed new boundary is on a natural line in the landscape and development in this area would not have effect on the countryside margin.</p> <p>The land had previously been designated for the proposed western section of the Park Gate Bypass for many years which demonstrates how unimportant this area has been considered in terms of amenity and indeed how suitable this site is as part of the built environment. Now that this by-pass has been withdrawn, the land is available for better use.</p> <p>We believe that if allocated, this land would promote so many of the key principles of the FBC and SE Plan that is to say promote a well-designed, sustainable and strong local economy. The site is considered to be Suitable and deliverable and in line with the adopted Core Strategy,</p> <p>The site conforms to the development of future planning policy documents including the Site Allocations & Development Management Plan and the Fareham Town Centre Area Action Plan.</p> <p>The site has good access to infrastructure including all services and facilities. Site location is just a hundred yards from the main shopping centre of Park Gate, a few steps to Swanwick railway station on the main line to London and a bus stop at the site entrance. Only three minutes driving time from the M27 and a few yards from an interchange to the local road network in all directions. Within the immediate locality are schools, open space and leisure facilities.</p> <p>Site conditions area ideal. There are no constraints in terms of ground contamination, public rights of way or air quality or any issues regarding conservation or flood risk.</p>	<p>be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>

ID	Respondent	Comment	Proposed Council Response
REF 133 Cont .		<p>The site is immediately deliverable, realistic and implementable.</p> <p>This land was formerly the rear garden to No 69 to 73 Botley Road. An application for development was submitted by the then owner of 73 Botley Road. Refusal for this application was given on appeal on 10 November 1978 for 9 units on the basis of inadequate sewerage system, inadequate visibility splays and the possibility of a link road adjacent to the land; none of which are applicable today. PPS3 does not preclude the development of garden land and may be considered against policy CS17 in particular. This site will now assist in the provision of housing needs in the Borough and in line with the well-publicised Government planning strategy.</p> <p>We also promote this land for the following reasons;</p> <p><u>Fareham BC Core Strategy and Ministerial Statement</u>; following the Chancellor of the Exchequer's budget, the Minister for decentralisation made a Government commitment to reform the planning system to promote sustainable development and jobs.</p> <p><u>Minister of State for Decentralisation</u> – planning for growth – 23 March 2011; Mr Greg Clark referred to the key role the planning system must play in ensuring sustainable development for economic growth as easily and quickly as possible. The Government's expectation is wherever possible, local planning authorities should say 'yes' with a presumption in favour of development. To positively deal with new development promptly and favourably and to approve applications where plans are absent, out of date, silent or indeterminate. When deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development (consistent with policy PPS4).</p> <p>Local authorities should reconsider applications at developers' request where particular weight should be placed on potential economic benefits offered by an application.</p> <p><u>Localism Bill</u>; includes measures for major reforms of the planning system abolishing regional strategies creating a duty on planning authorities to "cooperate" towards more planning, not less. (See section 39 of the Planning and Compulsory Purchase Act 2004) and see (amendment 370) see also Localism Bill on Parliament UK web site.</p> <p><u>Fareham Local Development Framework Core Strategy</u> – (garden sites) development plan document hearings in May 2011. Change in number 4.6, doc page number 21,</p>	

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		<p>section/para 4.20; deletes 'Fareham's housing targets can be met without considering residential garden site, such sites do not form part of the identified potential (except where extant planning permission exists). The position on the consideration of garden sites is clarified in Chapter 5 and Policy CS6 The Development strategy'. Proposals on residential garden sites will be considered against policy CS17 in particular.</p> <p>Change in Number 5.2 doc page no39, section/para 5.11 'whilst the Council recognises.....the removal of land contamination', reinstates residential garden sites for consideration.</p> <p>Doc Page Number 4.20, section/para 4.20 deletes 'As Fareham's housing targets.....Development Strategy' and replaced with 'acknowledgment that PPS3 does not preclude the development of garden land in urban areas. And that garden sites can assist in providing sufficient flexibility to meet future housing need in the Borough'. Proposals on residential garden sites will be considered against policy CS17 in particular .</p> <p><u>Approval Thursday 21 July item 4.</u> "To consider the use of gardens on a case by case basis"</p> <p>The Council is urged to consider a back garden settlement in this area since it will result in significant environmental and economic benefits to the immediate surroundings. It will also contribute to the delivery of housing needs with a high quality development and assist in providing sufficient flexibility to meet future housing needs in the Borough.</p>	
REF 134	Alan Wells on behalf of Hoare Construction Group Ltd	<p>Since the deadline for commenting upon the Draft Development Sites and Policies Plan expires upon 26th November 2012, I am writing to you about this piece of land. A proforma in respect of that land was submitted last year in response to the call for sites exercise. Our submission referred to the site as a potential employment site. We are currently in discussions about bringing forward proposals to provide a waste facility upon this site that would generate power from use of waste materials. The facility has the potential to provide power for the New Community North of Fareham, adn would also complement the adjacent re-cycling site. I recognize that the County Council is likely to deal with this planning proposal, and so we are talking to officers there about our proposals. However, since I am coming to see you about other land, I thought it would be helpful to raise this natter with you also. Please let me know if it would be helpful to let you have more information ahead of us meeting. I look forward to meeting you and your colleague. Please let me know if I can help further.</p>	<p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first instance.</p> <p>Proposals for required infrastructure, such as energy from waste, will need to be considered through discussions with Hampshire County Council. However, without indication from the County the site will not be allocated through the DSP Plan.</p>

ID	Respondent	Comment	Proposed Council Response
REF 135	White Young Green on behalf of Harvington Properties Ltd	<p>LAND ADJACENT TO THE NAVIGATOR PUBLIC HOUSE (FORMERLY THE SPINNAKER), SWANWICK LANE, LOWER SWANWICK</p> <p>3.1 In the context of the above assessment, we submit that it is essential for the Council to assess sites outside of the defined urban area boundaries for development for residential and employment purposes, especially as such sites could arguably deliver more sustainable forms of development, in line with the aims of the NPPF, than some of the sites within the urban area.</p> <p>3.2 Land adjacent to The Navigator Public House (formerly known as The Spinnaker), Swanwick Lane, Lower Swanwick is one such site (the site is identified on the plan at Appendix 1). As outlined above this site has previously been promoted for development during various consultations on the Core Strategy, Site Allocations DPD, SHLAA and the 2011 'Call for Sites'.</p> <p>3.3 This site is well related to the existing urban area, adjoining the defined urban area boundary to the north and east, and existing built development, including residential and commercial uses and community facilities (including the public house and children's playing facilities) as well as being accessible by sustainable forms of travel. As such it is considered that the site is sustainably located and is appropriate for development.</p> <p>3.4 Concerns have previously been raised about possible impacts on views from the Hamble as a result of the development of this site. The landscaping belt however along the site's western boundary is well established and provides a good quality and effective screen to any views from the Hamble to ensure that there are no unacceptable visual impacts.</p> <p>3.5 In the March 2010 SHLAA Volume 2 Update Report however the site was listed in Appendix 3 'Schedule of sites submitted for inclusion but rejected'. The reason for rejection is stated as: 'Site is situated outside of the settlement boundary and is within the open countryside. Site also falls within the defined Coastal Zone and predominantly a greenfield site, with only the curtilage of the existing public house being PDL. The Council would seek to retain where possible the public house given its community facility status'.</p> <p>3.6 The Council's attention however is drawn to the site location plan attached at Appendix 1 (the same area that has been submitted previously) which clearly identifies that the Navigator Public House (formerly known as The Spinnaker) itself is outside of the site. As such, there is no intention to lose this facility as part of the redevelopment of the site.</p> <p>3.7 The site has already been accepted by the Council as part previously developed and part greenfield in section 2.4D(ii) of its Sites Allocation Issues and Options document (January 2008) where it was identified that the whole site was developable for up to 40 dwellings. Consequently the Council has previously concluded that the site is</p>	<p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focused in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>
REF 135 Cont			

ID	Respondent	Comment	Proposed Council Response
		<p>appropriate for residential development. Notwithstanding this however, the whole site (with the exception of an area towards the southern corner) should be identified as previously developed land, as this previously formed the curtilage to the public house, with the existing access off Swanwick Lane remaining. 3.8 The site has a gross site area of around 1.17ha and could deliver around 40 residential dwellings (on around 1.03ha of the site), comprising a mix of units sizes and types to help meet the housing needs of the Borough, as well as delivering wider benefits including an extension to the adjacent children's playing facilities, to improve the level of playing facilities available to the community and an extension to its car park (an indicative site masterplan is attached at Appendix 2). 3.9 This site is both deliverable and developable immediately and it is therefore considered that it meets the requirements of the NPPF and is sustainably located, as such it is considered that it should be identified for development as an extension to the urban area.</p>	
REF 136	White Young Green on behalf of Linden Homes Strategic Land	<p>2.5 We fully support the Council in its commitment to promoting sustainable development, in line with the core principles of the NPPF, and acknowledge that this is one of the core tests of soundness. However, although the Council has stated its commitment to sustainable development this commitment has not been borne out in its approach taken elsewhere within the plan. This is because the Council has failed to justify its approach in considering the deliverability of housing sites or assessing its housing land supply. Furthermore the Council has sought to allocate existing productive employment sites for alternative uses without considering the impacts of this on employment land supply.</p>	<p>Noted.</p> <p>The Council has fully considered the suitability of all employment sites within the Borough as part of the Employment Land Review. Those employment sites allocated for housing within the draft plan have subsequently been removed.</p>
REF 136 Cont		<p>2.6 Core Strategy Policy CS6 seeks to prioritise development on previously developed sites within the defined urban areas, including their review as part of the Site Allocations and Development Management DPD (now called the Development Sites and policies DPD).</p> <p>2.7 We have reviewed the Council's comments at paragraph 3.6 of the draft Development Sites and Policies DPD that refers to the defined urban area boundaries and that in accordance with the Core Strategy the Council has reviewed the existing settlement boundaries set out in the Local Plan Review (2000) and that it has been concluded that there is sufficient land within the defined urban area boundaries to meet the Borough's development requirements.</p>	<p>Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBs to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont .		<p>2.8 There does not appear however to be any evidence available to demonstrate how any review of the defined urban areas has been undertaken and as such how the conclusion at paragraph 3.6 has been reached. The Council also does not appear to have considered the sustainability of sites situated outside the defined urban areas, but which are closely related to the adjoining settlements and their existing facilities and services. It may be that since the adoption of the Local Plan Review (2000) that these sites could now accommodate sustainable forms of development, which could deliver more suitable forms of development than sites situated within the urban areas. Furthermore, the Council has not identified whether any previously developed sites located outside of the urban areas has become available for development since the adoption of the Local Plan Review that may offer the potential for sustainable redevelopment.</p> <p>2.9 It is considered that the Council should publish for formal public consultation its review of the defined urban areas to demonstrate how it has reached its conclusion at paragraph 3.6. This would enable sufficient consultation on whether this is supported by a robust evidence base to meet the tests of soundness</p>	in the Development Sites and Policies Plan.
		<p>2.10 We have noted and support the basis of Policy ED1 which seeks to retain and maintain existing employment sites and areas set out in Table 8, Appendix B for B1, B2 and B8 Uses unless they are no longer viable for such uses. It is acknowledged that the areas identified include the principal strategic employment sites that are key to the delivery of employment within the Borough and as such it is necessary to maintain them for employment uses to help the meet Borough's needs. The redevelopment of the strategic employment land for other uses would create a need to allocate additional employment land elsewhere to meet needs and maintain employment opportunities.</p> <p>2.11 We have noted that there is no proposed policy which seeks to protect the other existing employment sites, outside of the existing sites set out in Table 8, Appendix B and as such in principle those sites could be redeveloped for alternative uses. Those other employment sites in the Borough, outside of those identified in Table 8, Appendix B, are potentially a significant employment land source and the loss of such sites could require additional employment land to be identified, especially as several of the draft allocations seek redevelopment of these sites for other uses. If there are not suitable sites within the built up area then suitable sites should be considered</p>	<p>Noted.</p> <p>The Council has fully considered the suitability of all employment sites within the Borough as part of the Employment Land Review. Those areas not included within Appendix B have been omitted due to their lack of suitability and are not considered to be a significant source of employment floorspace. Any loss of employment floorspace on these sites is likely</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont .		elsewhere across the Borough, such as land at Pinks Hill, Fareham	to have a minimal effect on overall supply and will not, in itself, necessitate the need to allocate new sites outside the urban area.
		<p>2.12 It is acknowledged that the Borough housing target of 3,729 dwellings between 2006-2026 is set out in adopted Core Strategy Policy CS2 and as such this is the baseline housing figure that needs to be delivered during this period (outside of the SDA). It is not considered however that the Council's approach to predicting housing land supply for the plan period is sound as no discount has been applied to the stated delivery from identified sources, so the delivery assumptions are unrealistic.</p> <p>2.13 The Council has adopted an approach to predicting housing supply based upon completions, existing commitments (in progress and not started), old Local Plan allocations from the 2000 Plan, new site allocations and windfalls. Although these are the correct criteria upon which to base housing delivery/supply, there has been no discount applied to any of the sources of supply, and as such they are unrealistic. We expand upon the reasoning for this below.</p>	<p>The housing supply meets the overall target and the 5 year land supply can be met with a 5% buffer (as required by the NPPF). The Borough has a history of over-delivery and therefore a 5% buffer is considered appropriate. A further discount factor is not considered necessary.</p>
		<p>2.14 It is accepted that the past completion figures are based on factual information and as such are accepted as correct. Furthermore, it is reasonable to assume that the delivery at Coldeast Hospital will come forward in view of the advanced stage of the Lot 2 planning application (which received a resolution to grant in October 2012). WYG are agents for this application and we understand that construction is due to start on site as soon as S106 negotiations are completed, the planning permission is issued and the Judicial Review period has passed. In addition, it is also reasonable to assume for these purposes that permissions commenced will be completed (although this is a generalisation as some commenced schemes may not be completed).</p>	Noted.
		<p>2.15 It appears however that the Council has assumed that all planning permissions (not started) will be delivered in full with no discount applied (sites identified at Table 10, Appendix C). This is a very unrealistic approach as not all consented sites will come forward for development due to a variety of issues such as land assembly, viability, site constraints etc. It is accepted good practice that a discount of at least 10% is applied to consented schemes to be a more accurate reflection of likely delivery; as such it is considered that such a discount should be applied in this case and that this would make the figure for delivery from unimplemented planning permissions more robust.</p> <p>2.16 A capacity of 370-432 dwellings has been identified on allocated sites that have</p>	<p>The housing supply meets the overall target and the 5 year land supply can be met with a 5% buffer (as required by the NPPF). The Borough has a history of over-delivery and therefore a 5% buffer is considered appropriate. A further discount factor is not considered necessary. All land owners of sites with extant planning permission have been contacted to ascertain likely start and completion timescales. These have been factored in to the delivery rates in the Plan.</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont .		<p>rolled forward from the Local Plan Review (2000), again assuming that all identified sites will be delivered with no discount applied. It is unclear whether any review of these sites has been undertaken due to omissions in the evidence base about the site selection process. The delivery of all of these sites however is considered very unlikely, especially as these sites have been allocated for development for over 10 years and some of them for considerably longer and were included in previous Local Plans, but have not been delivered.</p> <p>2.17 Since the adoption of the Local Plan Review (2000) there was a period of significant economic growth until 2008 which resulted in significant demand for housing land and good economic returns. If a site was not delivered during this very prosperous time then it is very doubtful whether there will be significant delivery of those sites in the future. As such we consider that a very cautious approach should be taken to the delivery of these sites. In view of the increased level of uncertainty associated with the future delivery of hitherto undeveloped allocations from the Local Plan Review (2000) then it would be appropriate to apply a discount of at least 50% to provide a more realistic projection of housing delivery from this source.</p> <p>2.18 Similarly the Council has identified a capacity of 337-600 dwellings on new site allocations. Again, it is unrealistic to assume that all of these sites will deliver housing and as such a discount of around 25% would be realistic to predict delivery from this source. This is because in current market conditions with severe restrictions on bank lending for development a 25% discount is a reasonable risk factor to apply to sites that do not have a current planning permission.</p> <p>2.19 We have noted that the Council has projected a total delivery of 420 dwellings on windfall sites, with Appendix F setting out the methodology for the windfall allowance. The Council has identified a total average annual supply from this source of 20 dwellings per annum for the previous 5 year period, however due to the economic downturn the Council has stated that this delivery rate is low and is unlikely to persist in future. The Council has applied a 50% multiplier to this figure to predict delivery from this source. There does not appear to be any basis for this assumption, for instance by looking further back to historic delivery rates during times of growth.</p> <p>2.20 It is likely that the best windfall sites came forward for development during the economically prosperous times and as such it is considered that this is source is likely to be constrained with a reduction in delivery rather than an increase. It is</p>	<p>All land owners of these sites have been contacted to ascertain the likelihood of these sites coming forward. These sites have also been independently assessed on their viability to ensure their delivery. A small number of these sites have been removed from the Plan since the draft stage on the basis that they are not viable. The supply is considered to be robust and, by using the lower range figures, a relatively conservative estimate of housing delivery.</p> <p>All these sites have been independently assessed for their viability and the Council have been in contact with land owners to ensure they are deliverable during the plan period. Sites not considered viable have been removed since the draft version of the Plan. Given that the Council can meet its target for 5 years plus a 5% buffer (as required by the NPPF) a further discount factor is not considered necessary.</p> <p>Noted. This 50% multiplier has subsequently been removed since the draft version of the Plan. Windfall delivery will be based on historic trends only.</p>

ID	Respondent	Comment	Proposed Council Response																																																								
REF 136 Cont		<p>considered that an assumption of future delivery based on the previous figure of 20 dwellings per annum would be more realistic for forecasting purposes. Based on our views, it is considered that Table 2 of the DPD should be amended as follows:</p> <table border="1" data-bbox="465 352 1491 1145"> <thead> <tr> <th data-bbox="472 357 1066 411">Source</th> <th data-bbox="1066 357 1234 411">Number of Dwelling</th> <th data-bbox="1234 357 1386 411">Discount Applied</th> <th data-bbox="1386 357 1491 411">Disco To</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 416 1066 448">Core Strategy Requirement (2006-2026)</td> <td data-bbox="1066 416 1234 448">3,720</td> <td data-bbox="1234 416 1386 448">-</td> <td data-bbox="1386 416 1491 448">3,720</td> </tr> <tr> <td data-bbox="472 453 1066 507">Housing Completions (1 April 2006 – 31 March 2012)</td> <td data-bbox="1066 453 1234 507">2,276</td> <td data-bbox="1234 453 1386 507">-</td> <td data-bbox="1386 453 1491 507">2,276</td> </tr> <tr> <td data-bbox="472 512 1066 566">Outstanding Core Strategy Requirement at 1 April 2012</td> <td data-bbox="1066 512 1234 566">1,453</td> <td data-bbox="1234 512 1386 566"></td> <td data-bbox="1386 512 1491 566">1,453</td> </tr> <tr> <td data-bbox="472 571 1066 603"></td> <td data-bbox="1066 571 1234 603"></td> <td data-bbox="1234 571 1386 603"></td> <td data-bbox="1386 571 1491 603"></td> </tr> <tr> <td data-bbox="472 608 1066 639">Core Strategy Allocations at Coldeast</td> <td data-bbox="1066 608 1234 639">180</td> <td data-bbox="1234 608 1386 639">0</td> <td data-bbox="1386 608 1491 639">180</td> </tr> <tr> <td data-bbox="472 644 1066 676">Planning permissions (in progress)</td> <td data-bbox="1066 644 1234 676">516</td> <td data-bbox="1234 644 1386 676">0</td> <td data-bbox="1386 644 1491 676">516</td> </tr> <tr> <td data-bbox="472 681 1066 713">Planning permissions (not started)</td> <td data-bbox="1066 681 1234 713">138</td> <td data-bbox="1234 681 1386 713">-10%</td> <td data-bbox="1386 681 1491 713">124</td> </tr> <tr> <td data-bbox="472 718 1066 772">Allocations rolled forward from existing Local Plan</td> <td data-bbox="1066 718 1234 772">370-432</td> <td data-bbox="1234 718 1386 772">-50%</td> <td data-bbox="1386 718 1491 772">185-216</td> </tr> <tr> <td data-bbox="472 777 1066 809">New allocations</td> <td data-bbox="1066 777 1234 809">337-600</td> <td data-bbox="1234 777 1386 809">-25%</td> <td data-bbox="1386 777 1491 809">253-450</td> </tr> <tr> <td data-bbox="472 813 1066 954">Projected windfall</td> <td data-bbox="1066 813 1234 954">420</td> <td data-bbox="1234 813 1386 954">Based on 20 dwellings per annum</td> <td data-bbox="1386 813 1491 954">280</td> </tr> <tr> <td data-bbox="472 959 1066 1013">Total</td> <td data-bbox="1066 959 1234 1013">1,961-2,286</td> <td data-bbox="1234 959 1386 1013"></td> <td data-bbox="1386 959 1491 1013">1,538-1</td> </tr> <tr> <td data-bbox="472 1018 1066 1114">South Hampshire revised housing requirement for Fareham 1 April 2012-31 March 2026 (excluding new community)</td> <td data-bbox="1066 1018 1234 1114">1,925 (2,200-275)</td> <td data-bbox="1234 1018 1386 1114">-</td> <td data-bbox="1386 1018 1491 1114">1,925 (2 275)</td> </tr> <tr> <td data-bbox="472 1118 1066 1145">Project surplus/ deficit</td> <td data-bbox="1066 1118 1234 1145">36-361</td> <td data-bbox="1234 1118 1386 1145"></td> <td data-bbox="1386 1118 1491 1145">-387- -1</td> </tr> </tbody> </table>	Source	Number of Dwelling	Discount Applied	Disco To	Core Strategy Requirement (2006-2026)	3,720	-	3,720	Housing Completions (1 April 2006 – 31 March 2012)	2,276	-	2,276	Outstanding Core Strategy Requirement at 1 April 2012	1,453		1,453					Core Strategy Allocations at Coldeast	180	0	180	Planning permissions (in progress)	516	0	516	Planning permissions (not started)	138	-10%	124	Allocations rolled forward from existing Local Plan	370-432	-50%	185-216	New allocations	337-600	-25%	253-450	Projected windfall	420	Based on 20 dwellings per annum	280	Total	1,961-2,286		1,538-1	South Hampshire revised housing requirement for Fareham 1 April 2012-31 March 2026 (excluding new community)	1,925 (2,200-275)	-	1,925 (2 275)	Project surplus/ deficit	36-361		-387- -1	
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REF 136 Cont		<p>2.21 It is considered that our updated table 2 above provides a more realistic and robust forecasting of residential development potential within the Borough. This identifies a deficit in housing land necessary to meet the South Hampshire revised housing requirement for Fareham with only a marginal surplus to meet the Core Strategy housing requirement. Therefore, although the priority of Policy CS6 of the Core Strategy is to direct development to sites within the settlement boundaries, as there is an insufficient</p>																																																									

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont		<p>housing land supply from these sources to the meet the Borough requirement, a review of sites outside of the urban areas is necessary to meet this unmet demand.</p> <p>Residential Development Allocations</p> <p>2.22 Notwithstanding our concerns with the Council's overall consideration of the Borough's housing land supply for the plan period, we are also very concerned over the soundness of the Council's approach to the identification of site allocations in its draft plan. There appears to be a lack of transparency in the Council's allocation of sites for residential development, a lack of consistency in the approach taken and a lack of consideration of delivery. This is because it lacks a robust and credible evidence base, as required by the NPPF, regarding alternative sites which were considered and the reasons for their rejection, and regarding the deliverability of such sites.</p> <p>2.23 WYG entered into discussions with Planning Policy Officers at Fareham Borough Council on 4th October 2012, following approval of the draft Development Sites and Policies DPD for consultation by the Council's Executive, to request a copy of the site assessment report used to consider potential alternative development sites, including sites submitted during the Council's 'Call for Sites' process in December 2011, to inform the sites selected in this draft DPD. Despite being informed on 5th October 2012 that this document would be published alongside the DPD when the consultation period started on 15th October 2012, this has still not been published despite numerous requests for this information from the Council.</p> <p>2.24 It is considered fundamental for the Council to be able to justify their draft allocations, and for the public to be able to understand and comment on the approach and methodology to the assessment and consideration of sites, that such a document is available for consideration. The Council appear to have followed a strategy of only considering sites within the urban area, with paragraph 8.15 of the draft DPD identifying that sites from various sources have been identified, but the Council has not published any assessment or consideration of sites promoted for development during its 2011 'Call for Sites' process, to enable the Council's view on alternative site suitability, deliverability or development potential to be understood.</p> <p>2.25 It cannot currently be identified whether the deliverability of the allocations from</p>	<p>The Council considers that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites outside of the urban settlement areas.</p> <p>The Council has assessed all sites put forward through the SHLAA process. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance which provides a clear framework for assessing submitted sites.</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont .		<p>the Local Plan Review have been reassessed in reallocating them within this DPD and as such whether the assumptions are realistic, the implications of which are potentially significant on the housing land supply of the Borough. It is essential therefore that the Council should be able to demonstrate that the housing land supply position is robust and justified by the evidence base. It is not considered that at present this can be demonstrated and as such the Council should consider and assess sites outside of the urban areas to identify a supply of alternative sustainable and deliverable sites.</p> <p>2.26 At present it cannot be determined which alternative sites, if any, within or outside of the urban areas have been considered and discounted by the Council in selecting the draft allocations, consequently the public has been excluded from being able to comment on that assessment process or understand whether indeed more suitable alternative sites are available or deliverable. It is considered that fundamental parts of the evidence base are currently missing and this is an unsound basis for this draft DPD to be progressed upon, as the plan cannot be justified by a robust or credible evidence base (a key test of soundness within the NPPF).</p> <p>2.27 It is considered that an assessment of all alternative development sites considered by the Council should be published before the draft DPD progresses to the pre-submission stage and this should be subject to a further period of formal public consultation to enable adequate consultation on the draft allocations.</p> <p>2.28 We have undertaken an initial brief review of the draft new residential allocations set out at table 9, Appendix C of the draft DPD and the accompanying mini development briefs. This has identified significant concerns over the approach taken and regarding the deliverability of sites. We have previously commented on the caution that should be exercised over the general deliverability of undelivered allocations from the previous Local Plan and as such our concerns with those sites are not addressed here.</p>	<p>The site selection process is ongoing and the evidence underpinning the housing targets is also being revised and updated. To that end it is not considered appropriate to release the site assessments until the final selection of sites has been made and taken through the publication version of the Plan.</p> <p>The updated SHLAA has now been published which includes an assessment of all sites submitted to the Council. These sites have been assessed for their availability and achievability. Those sites considered to be both achievable and available were then independently to ascertain whether or not they are viable. Where sites passed all three of these tests they have been included in the housing supply within the Plan.</p> <p>The site selection process is continually changing, with new sites being submitted constantly and sites previously in the supply becoming undeliverable for a variety of reasons. To this end it is considered appropriate to have the publication version of the plan accompanied by an up to date SHLAA showing how the final sites included in the Plan have been considered.</p>
		<p>Bus Depot, Gosport Road</p> <p>2.29 This is an existing category A employment site (as identified in the Local Plan Review, 2000) that is in current productive employment use and listed as an existing employment site at Table 8, Appendix B of the draft DPD (site ID 40) and as such is protected for employment uses under draft Policy ED1. As such its loss from employment uses could be significantly harmful to the supply of employment land, but it is identified for 32 dwellings. The Council has identified this as an important</p>	<p>This site no longer forms part of the housing supply due to ecological concerns.</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont .		<p>employment site that should be retained, consequently it is a paradox that the same plan also allocates it for residential development.</p> <p>2.30 There is reference to the site being purpose built for the bus operator and it would be unlikely that a new occupier would be found and as such its redevelopment would be likely to accommodate a new use (business or residential). There appears to be significant uncertainty about the availability of this site, especially as there appears to be no confirmation from the current occupier that they are seeking to vacate the site. Furthermore, as an existing employment site, the preferred reuse should be for employment uses and as such employment redevelopment should be the preferred approach, in accordance with Policy ED1. As such it is considered that this site should be discounted for residential uses.</p> <p>Citroen Garage, Wickham Road 2.31 This is also an existing productive employment site that is situated within an existing employment area. Again, there appears to be no confirmation that the site is due to be vacated and as such is available for development. Furthermore, in accordance with the NPPF's promotion of sustainable economic development, it is considered that the Council should seek to retain existing employment sites unless they are identified as no longer required for employment purposes or are no longer viable. Situated within a wider employment area it should be retained for employment uses. As such it is considered that this site should be discounted for residential development.</p> <p>118 Bridge Road, Sarisbury 2.32 This is also an existing productive employment site and again there appears to be no confirmation that the site is due to be vacated and as such is available for development. Furthermore, in accordance with the NPPF's promotion of sustainable economic development, it is considered that the Council should seek to retain existing employment sites unless they are identified as no longer required for employment purposes or are not viable. As such it is considered that this site should be discounted for residential development.</p> <p>Windmill Grove, Portchester 2.33 There are several in principle and site specific issues that may question the delivery of this site for residential development. This is an existing former employment site, however as the site is currently vacant this may be an indication</p>	<p>This site no longer forms part of the housing supply due to viability concerns.</p> <p>This site no longer forms part of the housing supply due to viability concerns.</p> <p>This site no longer forms part of the housing supply due to viability, flooding and ecology concerns.</p>

ID	Respondent	Comment	Proposed Council Response
REF 136 Cont		<p>that it is not required or viable for employment uses, but no evidence is currently presented within the DPD to confirm this.</p> <p>2.34 The site is located adjacent to Fareham Creek and is mainly in flood zones 2 and 3, as such an exceptions test would be required to enable development in flood zone 3 with appropriate mitigation measures to address flooding issues. Land raising is identified as a possible solution to mitigate flooding issues, however this would be subject to the need to consider landscape and visual issues within this wider low rise low density area.</p> <p>2.35 The site is located immediately adjacent to the Portsmouth Harbour SPA/Ramsar and as such nature conservation/ecological assessment and mitigation would be a fundamental part of any proposal.</p> <p>2.36 It is considered that there are specific and potentially significant development constraints that could affect the deliverability of this site and as such caution should be expressed over its deliverability until those issues are resolved.</p> <p>Conclusions Regarding the Draft DPD</p> <p>2.37 The above assessment and analysis has demonstrated that if existing employment sites are redeveloped for residential uses to help meet the Borough housing requirement then it will create a need to allocate additional employment land. Similarly, if the existing employment sites are retained in employment use then it will create an increased need to identify additional housing land.</p> <p>2.38 It is our view that there is a likely undersupply of deliverable housing sites within the urban areas to meet the Borough's housing requirement whilst also maintaining sufficient employment land. Consequently, the Council should undertake a comprehensive review of its urban area boundaries and assess sites outside of the urban areas to meet this need, land at Pinks Hill, Fareham is a sustainable and deliverable site that is well related to the urban area that could help meet the undersupply of housing and employment land.</p> <p>2.39 As part of its review of sites, the Council must publish its assessment of the urban areas and the Council's conclusions on all potential housing sites that have been considered and discounted, undertake a review of the deliverability of draft allocations and a</p>	<p>None of these sites are now being considered as part of the housing supply.</p> <p>The Council considers that there remains a robust supply of developable housing sites within the existing urban area that meet the housing targets set out in the latest PUSH South Hampshire Strategy. Core Strategy Policy CS6 seeks to focus development in the urban areas in the first instance, and therefore given that our need can be met within the urban area boundaries there is not considered to be any need to consider alternative sites outside of the urban settlement areas.</p>

ID	Respondent	Comment	Proposed Council Response
		<p>review of sites outside of the urban areas to meet the required supply. Furthermore, it should also publish its assessment of the implications of allocating existing employment sites for residential uses on employment land supply. The Council should then produce a revised Development Sites and Policies DPD which properly and realistically plans to meet the Borough's employment and housing land supply requirements, taking into account the Government's policy guidance that local planning authorities should 'boost significantly the supply of housing' (NPPF, paragraph 47), which is accompanied by a robust and credible evidence base.</p>	
		<p>LAND AT PINKS HILL, FAREHAM</p> <p>3.1 In the context of the above assessment, we submit that it is essential for the Council to assess sites outside of the defined urban area boundaries for development for residential and employment purposes, especially as such sites could deliver arguably more sustainable forms of development, in line with the aims of the NPPF, than some of the sites within the urban area.</p> <p>3.2 Land at Pinks Hill, Fareham is one such site (identified on the plan at Appendix 1). This site is located in a sustainable location, being well related to the urban area and the existing residential development at Wallington and employment areas at Fort Wallington Industrial Estate. Furthermore, the site is in an accessible location, close to the strategic highway network including the A27 and M27 J11 and is within close proximity of Fareham town centre. The site is well contained in visual terms, with existing landscaping able to be retained and enhanced to ensure that the development of the site does not have any significant visual impacts and the site could be developed without significantly impacting the wider Local Gap, with the A27 acting as a distinct defensible boundary. As such the site is suitable for development. It is requested that the Council considers allocating this site for comprehensive mixed use development comprising residential and employment uses (B1/B8 Uses) as part its Development Sites and Policies DPD.</p> <p>3.3 The site could deliver much needed housing to help meet the identified shortfall in housing land supply and furthermore, if the Council continues to pursue a strategy of allocating current employment land for residential uses, then it could also help to counter-balance those losses in employment land to meet employment land requirements to deliver economic growth.</p> <p>3.4 This site could deliver around 65 dwellings (at c.35 dph) and around 2ha of</p>	<p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>

ID	Respondent	Comment	Proposed Council Response
		employment land.	
REF 137	White Young Green on behalf of Harvington Properties Ltd	<p>LAND AT BROOK AVENUE, WARSASH</p> <p>3.1 In the context of the above assessment, we submit that it is essential for the Council to assess sites outside of the defined urban area boundaries for development for residential and employment purposes, especially as such sites could deliver arguably more sustainable forms of development, in line with the aims of the NPPF, than some of the sites within the urban area.</p> <p>3.2 Land at Brook Avenue, Warsash is one such site, which was promoted for development during the 2011 'Call for Sites' (the site is identified on the plan at Appendix 1).</p> <p>3.3 The land at Brook Avenue, Warsash is a well located good quality site that is suitable and available for development and which could deliver housing in the short term, to assist with the supply of housing. Although the site is located outside of the defined urban area of Locks Heath, it adjoins the urban area and is well related to existing residential development to the east, within the urban area, and to other recently consented development to the north at the former Keileen Nursery and as such is a logical extension to the urban area, to help meet the Borough housing requirement.</p> <p>3.4 The site is also well related to existing facilities and services and the sustainability plan at Appendix 2 demonstrates that the site is well placed, with a good range of existing facilities and services located within walking distance of the site, to meet the needs of residents.</p> <p>Furthermore, the site is also well served by existing public transport, providing good links to Locks Heath Centre as well as Fareham and Southampton to provide for wider needs such as leisure, retail and employment. Consequently, as the site is sustainably located, it reinforces the appropriateness of the location to accommodate new residential development in line with the NPPF.</p> <p>3.5 The area is characterised by existing housing development along Barnes Lane, Brook Lane and Brook Avenue and when travelling through this area from Locks Heath towards Warsash the perception is of a built up area. The proposed development site is screened from its surroundings with a good quality landscaped buffer to the southern and eastern boundaries that</p>	<p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>
REF 137 Cont .			

ID	Respondent	Comment	Proposed Council Response
		<p>could be retained and strengthened as part of any proposals on site to help restrict views into the site to maintain the existing character and appearance of the area and the privacy of nearby residents. Furthermore, it is considered that the site can be appropriately accessed with a vehicular and pedestrian access from Brook Avenue. Consequently, residential development could be successfully accommodated on this site, whilst respecting the character and appearance of the area and without having any unacceptable impacts on its surroundings. A plan is attached at Appendix 3 which demonstrates how this site could be developed.</p> <p>3.6 This net site area measures around 1.36ha and it is considered that the site could deliver around 28-30 dwellings.</p>	
138	Private Individual	<p><u>Land at Funtley</u> I am writing to you about land at Funtley that is held in a family trust. I attach a copy of a site plan, with the land shown within the red edge.</p> <p>My family has long associations with Funtley and I was born in the village. I still live close to the village, and recognise that community facilities are limited there.</p> <p>With that in mind I decided to become involved with the process of allocating land for various uses in connection with the emerging local plan for the Borough. At this stage I have simply submitted a plan and pro-forma indicating that the land would be available to provide a number of community facilities and some residential development.</p> <p>It was always the intention to engage people locally about this with a sketch plan prepared to show the extent of the land, and initial ideas for providing development there.</p>	<p>The site is located outside of the urban area boundary, as defined on the Policies Map, and in line with the Core Strategy, development will be focussed in the urban areas in the first instance. Given that the DSP Plan can demonstrate both a five year supply and a surplus against the overall housing target for the Borough, additional greenfield sites are not required.</p>

Further Consultation Summaries

Solent Breezes

1. The issues raised during the consultation have been broadly summarised below. They include:
 - the suitability of the site to host permanent residential use, in terms of access provision, traffic within the site and local amenities accessibility;
 - the suitability of the holiday homes/chalets to cater for permanent year-round use;
 - the potential impact on SPAs, SSSIs and local wildlife;
 - the lack of housing in the borough and the ability of the Solent Breezes site to address this;
 - the benefits of permanent occupancy such as improved maintenance and the safety of the site; and
 - the potential difficulty of monitoring and enforcing compliance with the proposed new policy.

2. Having assessed the representations received, it has been established that 63 responses (71%) were broadly in support of the new policy, 19 responses (21%) objected to the new policy, and 7 responses (8%) either had no comment to make or did not agree or disagree to the proposed new policy (see figure 2). It is therefore clear that among those individuals/organisations that responded to the consultation, there is considerable support for the inclusion of a new policy that seeks to restrict the use of chalets at Solent Breezes to remain as holiday accommodation, rather than providing flexibility to enable them to become permanent residential dwellings.

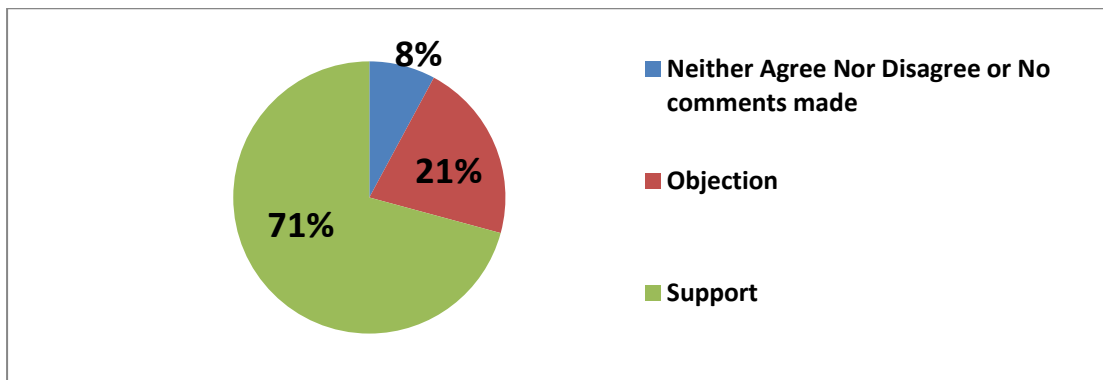


Figure 2: pie chart showing the percentage of consultees supporting/objectioning to the proposed new Solent Breezes policy

3. The Council also received responses from the following specific consultation bodies. These included:
 - English Heritage
 - Environment Agency;

- Hampshire County Council;
 - Highways Agency; and
 - Natural England.
4. English Heritage, the Environment Agency, and the Highways Agency had no comments to make on the proposed new policy but no fundamental objections. Hampshire County Council and Natural England supported the policy and did not recommend that any additional changes be made.
 5. Natural England welcomed the policy on the basis that the commitment to limit occupation of chalets and mobile homes within Solent Breezes on the basis that the approach would help *"to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development"*.
 6. Hampshire County Council's Countryside Service stated that *"any changes to year-round occupancy at Solent breezes should be strongly resisted"*. The County Council's Tourism manager considered *"that permanent residential accommodation is not appropriate at Solent Breezes and that occupancies need to be restricted to certain months of the year"*.

Council Response

7. Overall, there was widespread support for the new policy (71%). Support for the policy was highest among Fareham Borough residents (80%), while there was a more mixed view among holiday home owners with 41% supporting the proposed policy. The specific consultation bodies were either supportive or did not have any comment to make.
8. In light of their findings, it is considered that the proposed Solent Breezes Holiday Park policy restricting the variation of planning conditions to allow the occupation of any existing chalet or mobile homes on a permanent basis, represents an appropriate approach to the site. The inclusion of a clause in the policy restricting the use of any future chalets and mobile homes is also considered to represent the most appropriate mechanism to ensure that the character and appearance of Solent Breezes as a holiday park is maintained. It is therefore recommended that no substantive changes should be made to the proposed Solent Breezes policy.
9. Notwithstanding the widespread support for the policy stated above, a number of minor grammatical and typographical changes have been made to the policy and supporting text to provide additional clarity.

Gypsy, Travellers & Travelling Showpeople Consultation Responses

10. The Council received representations from the following specific consultation bodies:

- English Heritage;
- Hampshire County Council (Highways);
- Natural England; and
- Southern Water.

English Heritage

11. English Heritage suggested additional wording to the policy to secure satisfactory mitigation in relation to potential and existing heritage assets. English Heritage also requested that the Council ensures that the additional pitches at Newgate Lane have no adverse effect on the significance of the Grade II listed Carriston Cottage, which is located to the south of the access track. English Heritage also recommended Hampshire County Council's Historic Environment Record be consulted on development proposals for both sites.

12. Criterion (viii) of the policy has been amended to read:

- *“does not cause harm to natural and/or heritage assets that cannot be satisfactorily mitigated and/or compensated; and”*

13. The site brief for The Retreat, Newgate Lane has been amended to make reference to the need for additional pitches to have no adverse effect on the significance of the Grade II listed Carriston Cottage. The listed building is now shown on the site plan.

14. The Hampshire County Council's Historic Environment Record provides Fareham Borough Council with mapping of potential archaeological constraints. This mapping is referred to when all planning applications are considered therefore it is not necessary to include reference to this in the development site briefs.

Hampshire County Council (Highways)

15. Hampshire County Council's comments relate to the site at 302A Southampton Road and the potential A27 improvement scheme, which may involve carriageway widening. This could have a bearing upon access arrangements to the site, and should therefore be accounted for in the supporting text to the policy.

16. The site brief for 302A Southampton Road has been amended to make reference to proposed A27 improvement scheme and possible carriageway widening, which could have a bearing upon access arrangements to the site.

Natural England

17. Natural England is satisfied with the proposed policy and recommended that the Council includes Policy CS4: Green Infrastructure, Biodiversity and Geological Conservation of the Core Strategy in the development site briefs.
18. Policy CS4 now references the development site briefs, alongside the other relevant Core Strategy policies.

Southern Water

19. Southern Water disagreed with the proposed allocation at the Retreat, Newgate Lane, due to the close proximity of the site to the Peel Common Wastewater Treatment Works (WTW) on the basis that it considered that the amenity of the prospective residents would be affected by unpleasant odours resulting from the treatment processes, and that this would be contrary to guidance in the National Planning Policy Framework. Southern Water also stated that there was no evidence that the Council had considered alternative sites.
20. No changes have been made to the Plan in this respect. When Southern Water was consulted on the application for planning permission for the change of use of land at The Retreat, Newgate Lane for use as small private gypsy site, it did not provide a response. It was therefore concluded that Southern Water had no objection to the principle of this development at The Retreat, Newgate Lane. The Council's Environmental Health Manager, did, however, respond to the formal consultation on this planning application and did not raise a formal objection to the proposal. These were considerations in the determination of the planning application.
21. Since the grant of planning permission and the subsequent occupation of the gypsy site at The Retreat, Newgate Lane, the Council has not received any complaints of odour from the occupants of the site. Furthermore, there is no evidence to suggest that increasing the length of the planning consent or the number of occupants on site would change this. The principle of the acceptability of a temporary gypsy and traveller site at The Retreat, Newgate Lane has already been established and there is no logical argument that would allow a temporary permission but not a permanent permission on the grounds of odour alone.
22. The Council last had a complaint about odour from Peel Common WTW from any residents of Fareham on 6 July, 2012. The Council has only received complaints from seven residents (including some as far afield as Hill Head

and Lee-on-the-Solent) about odours from Peel Common WTW in the past four years and only one of those was subsequently substantiated. While Southern Water's concern about the possibility of future complaints is acknowledged, the Council's Environmental Health Technical Officer is satisfied that the proposed site allocation has properly considered the effect of "air quality on the health and well-being of travellers".

23. Notwithstanding the above, the Council is aware that Southern Water recently commenced a new programme of investment at the Peel Common WTW. Although the abatement of odours may not be the main driver for this work, the improvement works, scheduled for completion at the end of 2013, will significantly reduce the likelihood of odours from Peel Common WTW, further reducing any potential impact on the health and well-being of gypsies or travellers occupying the site at the Retreat, Newgate Lane.
24. The Council undertook an official 'Call for Sites' in November/December 2011 during which organisations and individuals interested in promoting their sites(s) in the Borough, were invited to submit suggested development sites for uses including, but not limited to housing, employment, retail, leisure and open space. However, during this period, no sites were put forward for gypsy/traveller accommodation.
25. The Council has subsequently taken a proactive approach to site identification and explored the potential of sites in the Borough to deliver gypsy/traveller pitches. Extensive consultations have taken place with landowners about the possibility of bringing these sites forward as gypsy and traveller sites. However, it became clear that many of the owners of these sites did not envisage their sites coming forward for these purposes and had already identified alternative uses for them.
26. The need to proactively plan for gypsy and traveller sites and identify sufficient deliverable sites to meet the objectively assessed need is considered to outweigh the very limited potential for odour and air quality issues. This position is underpinned by the support of the Council's Environmental Health advice, which has concluded that given the lack of odour complaints in the past year, together with the on-going improvement works, there is no likely risk to the amenity of gypsies and travellers.

Representations from Private Individuals

27. The Council received 80 responses via e-mail and online forms from local residents and including 1 representation from the Fareham & Gosport Green Party. Out of the 80 responses, 31 were in support, 1 was in support of the site at Newgate Lane and against the site at 302A Southampton Road, 44 responses were against both sites and 4 responses provided general

comments. Some comments included racist and/or offensive comments – these will not be published on the Council’s website.

28. Those respondents who supported the policy and proposed site allocations had the following comments:

- There is a need for additional gypsy pitches;
- Permanent sites will help prevent illegal encampments;
- Permanent sites will help contribute towards social inclusion; and
- Keeping additional pitches on already established sites.

29. Those respondents who objected had the following comments:

- Fareham already has sufficient pitches;
- Concerns over impact on public rights of way;
- The proposed sites lack adequate infrastructure;
- Concerns about safety;
- Concern that 302A does not provide adequate access on to the A27;
- Concern about mess and site appearance; and
- Concerns about development in the countryside.

30. Respondents were asked if they knew of any other sites that would be suitable for permanent pitches. Various areas were suggested as potential locations of sites for gypsies, travellers and travelling showpeople including the former amenity tip off Hook Lane, areas off Military Road and Standard Way, an area at the end of Birdwood Grove, also Abshot Road, Little Abshot Road, Posbrook Lane, Ranvilles Lane and Newgate Lane. However none of the respondents provided site plans identifying specific sites and with the exception of two respondents, did not provide any contact details.

31. A further site was put forward by a third party for the ‘Lessanto’ bungalow, within Employment Site E2: Little Park Farm.

32. Welborne was also suggested as a possible site for gypsies, travellers and travelling showpeople.

33. While many of these suggestions did not provide contact details, or site plans, officers have undertaken a general review of the broad localities of those areas put forward to assess whether or not there are any sites with potential to provide gypsy/traveller pitches to meet the identified need. Having

completed this assessment, none of the suggested locations are considered to offer potential for gypsy/traveller sites.

34. Having contacted the owners of the 'Lessanto' bungalow within Employment Site E2: Little Park Farm, it has been confirmed that the owners intend to bring forward proposals for employment uses rather than for gypsy and traveller pitches.

35. Welborne was also suggested as a possible location for gypsies, travellers and travelling showpeople. To date no capacity exists within the master plan for a site for gypsy and traveller pitches.

Responses on Social Media

36. The Council received 18 responses via 'Facebook'. Out of the 18 responses, 7 were against the policy, 1 in support and 10 provided general comments.

Fareham College & Additional Employment Sites

Fareham College

37.55 People responded regarding the Fareham College site. Of these responses 65% were concerned with traffic, parking and the need for road improvements. 27% of respondents were of the opinion that community infrastructure (such as doctors surgeries) would need improvement. 20% were worried about open space access and provision. 20% were either against housing or wanted an equal reduction in the Welborne numbers as the number proposed for the college. 18% of respondents brought up the issue of pedestrian access into and through the site with some lauding the proposed pedestrian access to Redlands Lane. 15% were concerned about the retention of trees with some respondents unsure which were to be protected. A similar fraction supported the proposals.

38. Hampshire County Council is responsible for Highway improvements in the Borough. They were consulted on the proposal and raised no objections, however it is worth noting that there are already highway improvements planned for the A27, including the junction with Bishopsfield Road. Parking numbers will be considered in detail at the application stage, but the Policy does make specific reference to the fact that any development must “*ensure that...sufficient levels of car and cycle parking are provided on site to serve all of the existing and proposed uses*”

39. The Council has no control over the provision of doctor’s surgeries or dentists; this is usually delivered based on demand. In terms of other community infrastructure, the site is located close to Broadlaw Walk Community Centre and shops as well as having good bus links to Fareham Town Centre via the Avenue and Bishopsfield Road.

40. The Council is seeking to retain as much of the playing pitches and open space as possible, whilst opening most of the area up for public access. This will provide local residents with access to a new area of open space that was previously retained for use only by the College. The Policy includes bullet points on the community use of the open space as well as the retention of significant trees.

41. As well as providing new homes at Welborne, the Council has a target to provide an additional 2,200 homes (between 2011 and 2026) in the rest of the Borough. The strategy for providing these homes is to develop on previously developed sites, such as the College site, in preference to urban extensions and development on greenfield land. The College has committed to moving some of its operations to a new site at Daedalus, which opens up a large area

of previously developed land within the centre of Fareham. Residential development is considered a suitable and efficient re-use of this land.

42. There will be improved access into the site as a result of new access points and the fact that the open space will become publically accessible. Support for the access to Redlands Lane is noted.

Additional Employment Sites

43. The Kite's Croft site had 25 respondents. 36% of which were concern about the traffic, parking and access aspects. An equal percentage supported the proposal. Other issues raised were the need for public transport improvements. Some observed that the plans were not clear while others wished for it to be kept as is. One respondent failed to see the merits of increasing employment floorspace when there were vacant sites elsewhere.
44. Cartwright Drive had 19 respondents. 53% of respondents raised concerns about traffic, parking and access. 37% supported the proposals while others suggested in be used for housing. There was a suggestion for the improvement of public transport links and another respondent queried the need for more employment floor-space.
45. There were a total of 24 respondents for the Walled Garden. 42% of the responses referenced traffic and parking concerns. 33% were in favour of the proposals. 17% wished for the character of the area to be protected. One responded suggested the site be used as residential rather than employment floor-space. Two of the respondents were against development and an equal number thought the plans were not clear.
46. The level of support for all three proposals is noted.
47. Hampshire County Council is responsible for Highway improvements in the Borough. They were consulted on the proposal and raised no objections, however it is worth noting that there are already highway improvements planned for the A27. Parking numbers will, ultimately, be determined at a planning application stage, but will need to adhere with the relevant standards. All three proposals are small scale in comparison to the much larger existing employment sites they sit within, meaning traffic implications are likely to be minimal. All three sites are considered to already have adequate access.

48. In terms of the need for additional employment floorspace, the Borough has a target of “net additional” floorspace to provide up to 2026. The majority of this will be delivered at the Enterprise Zone at Daedalus, however there remains a need to plan for small scale additions elsewhere to allow for flexibility and market choice. Whilst it is accepted that the existing vacant stock will most likely be filled in preference to new development, there remains a need to plan beyond this to account for growth over the length of the plan period.
49. A key aspect of any proposals in the Cams area, including the Walled Garden, will be that it has to be respectful of its surrounding. The site is part of a conservation area and in the setting of a listed building, however, given that previous permission has been granted for employment use on the site it is apparent that this can be achieved whilst not adversely impacting upon the character of the area.