

Keely, Lauren

From: Chris Herbert [REDACTED]
Sent: 26 January 2021 10:00
To: Planning Policy
Subject: Fareham Local Plan 2037
Attachments: 210125_FarehamBC_localplan_issue.pdf; NetworkRailResponseRedacted.pdf; SEEAWP-annual-report-2018.pdf

Categories: Blue category

Please find attached our comments in respect of allocations FTC3 and 4.

regards

Chris Herbert
Planning Manager - South



AGGREGATE INDUSTRIES UK LIMITED
[REDACTED]

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.

If you have received this email in error please notify the originator of the message. This footer also confirms that this email message has been scanned for the presence of computer viruses.

Any views expressed in this message are those of the individual sender, except where the sender specifies and with authority, states them to be the views of Aggregate Industries.

Aggregate Industries UK Limited, Registered in England and Wales Company Number 00245717.
Registered Office: Bardon Hall, Copt Oak Road, Markfield, Leicestershire, LE67 9PJ.

26th January 2021



Planning Strategy
Fareham Borough Council
Civic Way
FAREHAM
PO16 7AZ

Your ref:
Our ref: CH/Fareham

Dear Planning Strategy

FAREHAM LOCAL PLAN 2037 – PUBLICATION VERSION

Whilst I am aware that the consultation period on the above plan has recently ended I am writing to express our concern regarding allocations FTC3 and FTC4 – Fareham Station east and west, which either adjoin or are adjacent to our rail served aggregates depot at Fareham.

You will be aware that our depot is a safeguarded site in the adopted Hampshire Minerals and Waste Local Plan and I note that from the attached correspondence from Network Rail that they have also highlighted the presence of the depot. However the supporting text to FTC3 and FTC4 makes no mention of the depot and I am therefore writing to ask that you amend the text to refer to the presence of the depot and the need for any future development proposals to incorporate appropriate stand offs, or other mitigation measures, in accordance with the agent of change principle as set out in paragraph 182 of the National Planning Policy Framework (NPPF).

Rail depots, such as Fareham, play a fundamental role in supplying the South East with the aggregates that are needed to keep our economy moving and we consider them to be play a nationally significant role in aggregates supply. The South East England Aggregates Working Party Annual report dated January 2020 (attached to this letter) at section 7 on Aggregate Rail Depots confirms that the level of imported crushed rock is now at 4.5 million tonnes, which is the highest since 2009 and recent sales averages are 13% higher than general sales averages all of which indicate increasing demand for crushed rock.

This clearly demonstrates that in terms of minerals supply the South East is heavily dependent on the rail served depots, such as Fareham, in supplying crushed rock and it is therefore important that these sites are safeguarded in accordance with national policy, as set out in paragraph 204 (e) of the NPPF.

“ e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material”

AGGREGATE INDUSTRIES UK LIMITED
Frome Regional Office, Edwin Sims House, Vallis Road,
Frome, Somerset, BA11 3EG, United Kingdom
Telephone +44 (0)1373 451001
Facsimile +44 (0)1373 836501
www.aggregate.com

If you require any further information please contact me on the details provided.

Yours sincerely

On behalf of Aggregate Industries UK Ltd



Chris Herbert

Planning Manager – South



1



A: 1 Eversholt Street, London NW1 2DN

[Redacted]

T: [@Spotlight_NR](#)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

If you are in doubt about whether to submit a site or if you have any other queries please contact the Council on 01329 824601 or email planningpolicy@fareham.gov.uk.

Planning Strategy & Regeneration Team
Fareham Borough Council
01329 824601



This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office
Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

South-East England Aggregates Working Party

Annual Report 2018



South East England Aggregates Working Party (SEEAWP)

January 2020

This page is intentionally blank

Contents

Executive Summary	1
South East Aggregates Working Party (SEAWP)	3
National Planning Policy Framework (NPPF)/ Planning Practice Guidance (PPG)	5
Aggregates Monitoring 2018 - Introduction	6
Aggregate Sales and Consumption	7
Quarries	9
Wharves	14
Aggregates Rail Depots	16
Secondary and Recycled Aggregate Facilities	18
Aggregates Infrastructure Capacity	20
Aggregates Facilities and the Environment	22
Minerals Plans and Planning Applications	25
Local Aggregates Assessments	25
Conclusions	27

Tables

Table 1: Aggregates facilities ¹ in South East England by mineral planning authority – 2018	Error! Bookmark not defined.
Table 2: Aggregates ¹ sales and consumption for South East England – 2001-2014 .	7
Table 3: Exports and imports of aggregates to/from South East of England - 2014...	9
Table 4: Quarry sales, permissions, reserves in South East England - 2009-2018..	10
Table 5: Sales, permissions and reserves at soft sand, sharp sand and gravel and crushed rock quarries for mineral planning authorities ¹ - 2018	13
Table 6: Sales of marine sand and gravel, imported crushed and quarried sand and gravel at wharves for groups of mineral planning authorities – 2009-2018	15
Table 7: Sales of crushed rock, marine and quarried sand and gravel at rail depots for groups ¹ of mineral planning authorities – 2009-2018	17
Table 8: Sales of recycled and secondary aggregates for mineral planning authorities – 2009-2018	19
Table 9: Capacity at aggregates wharves and rail depots - 2018	21
Table 10: Aggregates assessment summary for South East England - 2018	27

Figures

Figure 1: South East England: Mineral Planning Authorities	4
Figure 2: Aggregates sales in South East England 2009-2018	8

Figure 3A: South East England (W): Location of primary aggregates facilities - 2018	23
Figure 3B: South East England (W): Location of primary aggregates facilities - 2018	24

Appendices

Appendix A: Aggregates sales for South East England – 2009 - 2018	30
Appendix B: Sales, permissions, reserves at sand and gravel quarries 2009 - 2018	31
Appendix C: Sales, permissions and reserves of sand and gravel quarries by mineral planning authority - 2018.....	32
Appendices D: Capacity at quarries and recycling/secondary aggregates sites for each mineral planning authority - 2018	33
Appendix E: Major aggregates mineral planning decisions in South East England - 2018	Error! Bookmark not defined.
Appendix F: Key milestones for mineral plans in the South East - 2018	39
Appendix G: Aggregates quarries and facilities – 2018.....	46
Appendix H: Members of the SEEAWP.....	61
Appendices I: Minutes of SEEAWP meetings - 2018	62

Executive Summary

- The report is prepared by the South East of England Aggregates Working Party (SEEAWP) and includes the results of the Aggregates Monitoring (AM) 2018 survey, the proceedings of the Aggregate Working Party (AWP) and a summary report on the latest Local Aggregates Assessments (LAAs).
- SEEAWP met three times during 2018 and responded to consultations, managed the AM 2017 survey and scrutinised LAAs 2018.
- The information from Aggregates Monitoring 2018 is included in this Report and summarised below – *see main report for further details*

Thousand tonnes unless otherwise specified

Aggregates	Sales 2018	Average 10-year sales	Average 3-year sales	Reserve or Capacity	Land-bank* (Years)	Capacity Margin* %
Quarried Soft Sand	1,819	1,623	1,802	24,117	13	45
Quarried Sharp Sand and Gravel	4,579	4,280	4,349	48,242	10	51
Quarried Sand & Gravel	6,399	5,906	6,160	72,359	11	49
Quarried Crushed Rock	1,631	1,364	1,615	32,902	38	60
Wharves (S&G)	5,905	6,082	6,376	9,394		16
Wharves (CR)	2,477	1,924	2,440			
Rail Depots (CR+S&G)	5,726	3,665	4,869	7,675		25
Recycled/ Secondary Aggregate	4,581	n/a	4,497	12,020		57

See Tables 4, 9, 10 and Appendix for explanation of methodology for calculating land banks and capacity margins

- Overall the picture is of aggregates sales above past averages – the exceptions are sand and gravel sold through the wharves not meeting the 3-year average sales level. There are also some variations between mineral planning authorities.
- All quarried aggregates in the South East have reserves above the 7-year land bank minimum requirement set in the NPPF, although there are a few individual mineral planning authorities that are below this.
- It is noted that there may be general capacity issues for the wharves where there is only a capacity margin or 'headroom' of 16%. However, the AM 2018 information on this cannot be fully relied on and there could be more capacity

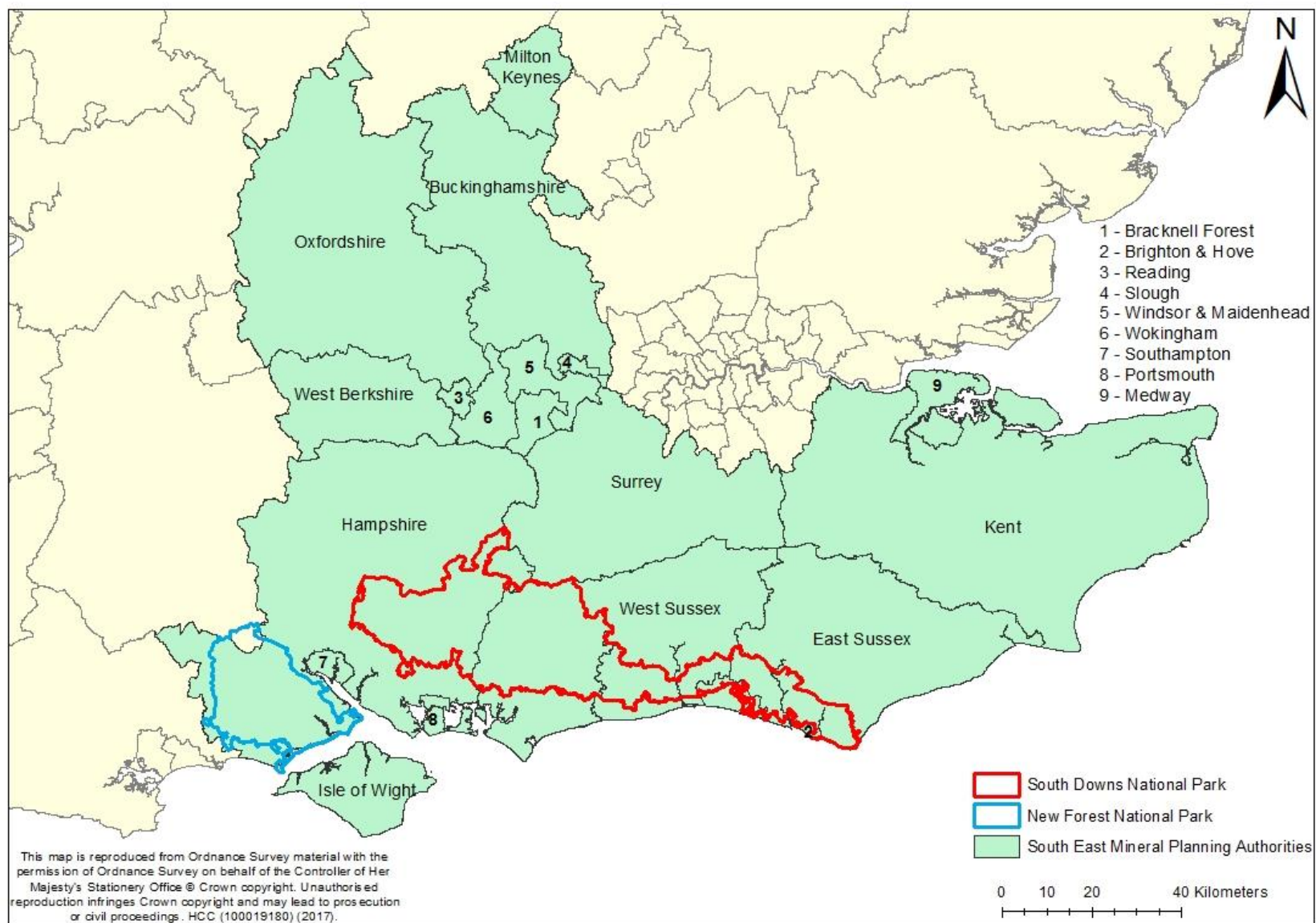
than recorded. Nevertheless, this matter will need further consideration in the next Annual Report.

- The AM data forms the basis for the Local Aggregates Assessment 2019 submitted by the mineral planning authorities, which provides a more detailed local picture of aggregates demand and supply. This shows that a number of mineral planning authorities: East Sussex, Hampshire, Milton Keynes, West Berkshire and West Sussex have reserves below the 7-year minimum requirement.
- The LAAs also show that there is a need to identify need for further wharf infrastructure in Hampshire and possible pressures on rail depot capacity in Berkshire and Oxfordshire.
- The LAAs note in varying detail the planning applications and plan allocations that might have an impact on quarry reserves, wharves, rail depot and recycled/secondary aggregates facilities.
- The Annual Report concludes that South East England is making a 'full contribution' to aggregates needs in that collectively, the quarry landbanks more than meet the minimum requirement. However, there are pressures on reserves if they are not replenished and potential capacity issues at the aggregate wharves which needs further investigation. The degree to which this might be addressed by undetermined planning applications, mineral plan allocations or indeed emerging mineral plans is not clear.

1 South East Aggregates Working Party (SEEAWP)

- 1.1 This is the 22nd in a series of annual reports prepared for the South East of England Aggregates Working Party (SEEAWP) since 1996. The reports hitherto concentrated on the results of latest annual Aggregate Monitoring Survey of different types of aggregates sales, quarry reserves and infrastructure capacity. The scope of this report has now been extended to report on the proceedings of SEEAWP and a general overview and conclusions of the Local Aggregates Assessments (LAAs) prepared by the mineral planning authorities in the South East.
- 1.2 SEEAWP is one of a number of Aggregates Working Parties (AWPs) that cover England and Wales. The geographic coverage of SEEAWP is illustrated in Figure 1 overleaf.
- 1.3 SEEAWP is a technical advisory group of mineral planning authorities, aggregates companies and other relevant organisations within the South East. Membership of SEEAWP is outlined in Appendix J.
- 1.4 The role of SEEAWP is to:
 - consider, scrutinise and provide advice on the Local Aggregates Assessment (LAA) prepared by each mineral planning authority in the South East and if required respond to findings of LAAs elsewhere;
 - provide an assessment, based on the LAAs, on the position of overall demand and supply for the South East, including whether, in its view, the area is making a full contribution towards meeting both national and local aggregate needs. The AWP assessment should also be informed by other economic data and should also include an indication of emerging trends of demand in its area;
 - obtain, collect and report on data on minerals activity in the South East including aggregates demand and supply and information on sales, permissions and mineral reserves and data on recycled and secondary sources; and
 - provide advice to individual mineral planning authorities.

Figure 1: South East England: Mineral Planning Authorities



- 1.5 SEEAWP met three times in 2018 and the minutes of these meetings are included in Appendix K. The main matters considered were:
- Responding to the consultation on revised National Planning Policy Framework – concern was expressed that the minerals policy was being weakened. *(See section 2.3 below)*
 - Aggregates Monitoring (AM) 2017 report – it was noted that overall aggregate sales over the previous two years were at the highest for a decade. The report was submitted to the MHCLG at the end of the year after all the LAAs were submitted.
 - Responding to the London Plan consultation.
 - Scrutinising the LAAs prepared by the Mineral Planning Authorities – all authorities submitted an LAA.
 - Consideration of the new requirement in the Planning Practice Guidance (PPG) for AWP's to be additional signatories to Statements of Common Ground for mineral plans. *(See section 2.3 below)*
 - Soft sand and road planings.
 - Leicestershire LAA – concern was expressed over the longer-term prospects of crushed rock supply from the rail linked quarries.

2 National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

- 2.1 The NPPF recognises minerals as a strategic priority in local plan preparation. Mineral planning authorities, in particular, should plan for a steady and adequate supply of aggregates.
- 2.2 The PPG identifies the Managed Aggregate Supply System (MASS) 'to ensure a steady and adequate supply of aggregate mineral, to handle the significant geographical imbalances in the occurrence of suitable natural aggregate resources, and the areas where they are most needed.'¹ MASS is delivered at:
- local level by mineral planning authorities, which are expected to prepare Local Aggregate Assessments (LAAs), to assess the demand for and supply of aggregates and
 - at regional level by Aggregate Working Parties.
- 2.3 A revised NPPF was published in July 2018, but policy regarding aggregate supply was not substantially altered. However, the subsequent revised Planning Practice Guidance includes additional advice that for the preparation of minerals plans, AWP's are also expected to be treated as additional signatories in statements of common ground (SoCG). No requests were made to SEEAWP to sign a SoCG during 2018.

¹ PPG (para 60) further states that 'It requires mineral planning authorities which have adequate resources of aggregates to make an appropriate contribution to national as well as local supply, while making due allowance for the need to control any environmental damage to an acceptable level. It also ensures that areas with smaller amounts of aggregate make some contribution towards meeting local and national need, where that can be done sustainably.'

3 Aggregates Monitoring 2018 - Introduction

- 3.1 A major activity of SEEAWP is organising an annual aggregate monitoring (AM) survey. Periodically there is a National (England and Wales) collation of data to inform inter-regional supply patterns. However, this was not done for the AM 2018 survey, which was undertaken in 2019 by the South East England mineral planning authorities and co-ordinated by the SEEAWP Secretariat. Tables, diagrams and maps that summarise the collated data, including that of previous AM surveys are included in the Report. Some additional background information is included in the tables in Appendices which also include information on mineral planning decisions, mineral plans, and a schedule of all recorded active or inactive aggregates sites.

Table 1: Aggregates facilities¹ in South East England by mineral planning authority – 2018

Number of facilities

Mineral planning authority	Quarries			Wharves	Rail Depots	R/SA ² Sites	Total
	Soft sand	Sharp sand and gravel	Crushed Rock				
Berkshire Unitaries	1 (1) ³	9 (3)	0	0	4	12 (1)	26 (5)
Bucks/MK	0	11 (3)	0	0	1 (1)	8 (3)	20 (7)
E. Sussex	0 (1)	1	0	4 (7)	1	16	24 (8)
Hampshire	4	7 (1)	0	6 (1)	3	23 (2)	43 (4)
Isle of Wight	2	5	1	2 (1)	0	3	13 (1)
Kent/Med.	17	14	2	14	4 (1)	22 (3)	73 (4)
Oxfordshire	8 (1)	11 (6)	14 (2)	0	4 (1)	26 (3)	63 (13)
Surrey	6 (3)	2 (4)	0(2)	0	2	12 (5)	22 (14)
W. Sussex	6 (1)	1 (1)	0	6 (2)	4 (1)	15 (5)	32 (10)
South-East England	44 (7)	61(18)	17 (4)	32 (11)	23 (4)	137 (22)	316(66)

Source: AM 2018 survey

¹ Some facilities share the same site.

² Aggregate recycling and secondary aggregates sites

Notes: ³ Figures in (parenthesis) are numbers of inactive facilities including permissions that have not yet commenced

- 3.2 The tables in the report either present data regionally or by individual/groups of mineral planning authorities, where commercial confidentiality has to be protected. Table 1 illustrates the number and distribution by mineral planning authority of

aggregates facilities across the South East. The location of primary aggregates facilities /operations are also illustrated in the maps, Fig 3A/B below.

4 Aggregates Sales and Consumption

4.1 There was no National Collation of AM 2018, but to provide a fuller context Table 2 includes the AM 2014 (the date of the last National Collation of AM surveys) information on the overall aggregates sales and consumption in the South-East. This shows that:

- A general decline in both aggregate sales and consumption since 2001, although there has been some recovery from a low point in 2009.
- The South East is a net importer of primary aggregates with sales representing only 74% of aggregates consumption. This proportion has varied since 2001 when sales only accounted for 65% of aggregates consumption.
- In 2014 primary aggregate sales (14.28mt) and consumption (19.20mt) appeared to be trending towards pre-recession levels.

Table 2: Aggregates¹ sales and consumption for South East England – 2001-2014

Thousand tonnes (unless specified otherwise)								
Aggregates Sales								
Year	Sand and Gravel				Crushed Rock		All Primary Aggregates	
	Quarried	%	Marine	%	Quarried	%	Quarried/ Marine	%
2001	12,450	56	7,219	33	2,398	11	22,067	100
2005	9,573	57	5,952	36	1,238	7	16,763	100
2009	6,007	49	4,985	41	1,294	11	12,286	100
2014	5,858	41	6,626	46	1,795	13	14,279	100
Aggregates Consumption								
	Sand and Gravel				Crushed Rock		Primary Aggregates ¹	
	Quarried	%	Marine	%	Quarried	%	Quarried/ Marine	%
2001	12,488	37	7,036	21	14,603	43	34,127	100%
2005	7,551	36	5,691	27	7,935	37	21,176	100%
2009	5,679	36	4,700	30	5,383	34	15,762	100%
2014	5,623	29	6,448	34	7,126	37	19,197	100%

Source: SEEAWP AM 2001, 2005, 2009 and 2014

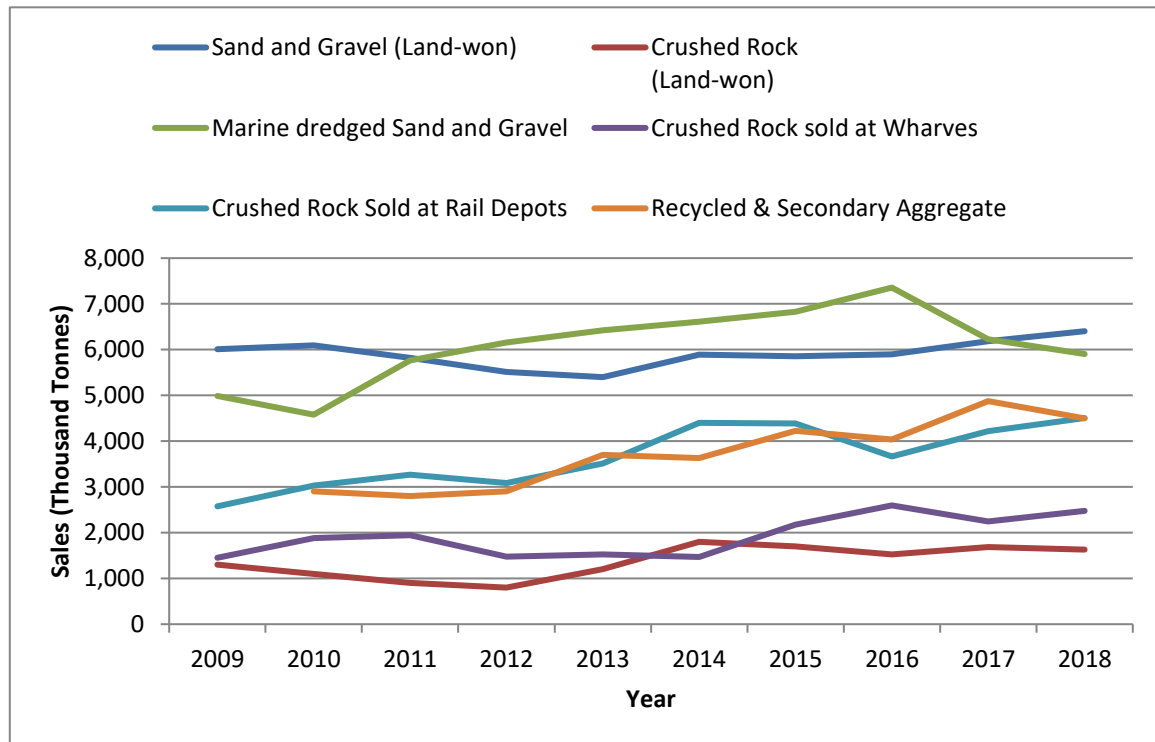
Notes: ¹ Sand and gravel, crushed rock

4.2 Figure 2 (overleaf) and Appendix A illustrate a more detailed picture of aggregates sales from 2009 to 2018 that shows:

- Overall aggregates sales in 2018 were about the same as the recent (3-year) average and these are 14% above the general (10-year) average.

- There is little change in the pattern of supply over the last 10 years with; quarries contributing 30-31%; marine dredged sand and gravel 30-31% and imported rock (via sea and rail) 26% and; recycled/secondary aggregate 17-18%. This suggests there are no dramatic changes to the sourcing of aggregates in the South East.

Figure 2: Aggregates sales in South East England 2009-2018



Source: AM 2009-2017 reports; AM survey 2018 - see Appendix A

4.3 Regarding the geographic pattern of import and export of aggregates to/from the South East in 2014 Table 3 reveals that:

- Gross imports amounted to 6.79mt of which 5.48mt was crushed rock and 1.31mt sand and gravel.
- The most significant origin of imports is the South West (3.82mt) of which 90% was crushed rock.
- There was also 0.46mt from London of which 70% was marine sand and gravel landed at London wharves; the East of England provided 0.42mt (virtually all quarried sand and gravel) and; the East Midlands provided 0.89mt of which 90% was crushed rock.
- The South East also imported about 0.97mt of crushed rock, primarily of igneous origin, from outside England and Wales.
- The export of aggregates from the South East amounted to 1.52mt.
- The principal destination was London which took 0.88mt - virtually all sand and gravel, of which nearly 60% was marine sand and gravel sold

from wharves in the South East. However, 0.28mt of quarried sand and gravel was sent to the South West.

Table 3: Exports and imports of aggregates to/from South East of England - 2014

Thousand tonnes							
Exported Aggregates	Sales in SE & Un-Allocated Sales	SW England	London	East England	East Midland	Other	All sales outside South East
Quarried S&G	4,990	284	495	61	6	21	867
Marine S&G	6,113	51	387	75	-	-	513
Total S&G	11,103	335	882	136	6	21	1,380
Crushed Rock	1,658	14	2	5	59	57	137
Total	12,761	349	884	141	65	78	1,517
Imported Aggregates	Outside England & Wales	SW England	London	East England	East Midland	Other	Total Imports to South-East
Quarried S&G	-	324	131	408	89	24	976
Marine S&G	-	6	329	-	-	-	335
Total S&G	-	330	460	408	89	24	1,311
Crushed Rock	966	3,489	-	11	804	207	5,478
Total	966	3,819	460	419	893	231	6,789

Source: SEEAWP 2014 report

5 Quarries

- 5.1 At the end of 2018 Table 1 shows there were 122 active aggregates quarries of which 44 produced soft sand, 61 produced sharp sand and sand and gravel and 17 crushed rock. There are few that produce more than one type of primary aggregates product. These can be identified in the list of each type of aggregates facilities (quarries, wharves, rail depots and recycling and secondary aggregate sites) in Appendix C.
- 5.2 Information on sales, permissions, reserves and landbanks for the South East's quarries over the last decade are illustrated in Tables 4 and 5 overleaf and capacity in Appendix F.

Table 4: Quarry sales, permissions, reserves in South East England - 2009-2018

Thousand Tonnes (unless specified otherwise)												
Year	Soft Sand				Sharp sand and gravel				Crushed rock			
	Sales	Permits	Reserve at end of year	Land-bank ¹ (years)	Sales	Permits	Reserve end of year	Land-bank ¹ (years)	Sales	Permits in 2018	Reserve at end of year	Land-bank ¹ (years)
2009	1,387	224	21,296	n/a	4,620	11,455	57,750	n/a	1,300	450	47,932	33
2010	1,676	8,258	34,389	n/a	4,415	1,980	52,638	n/a	1,100	8	47,564	33
2011	1,524	860	32,822	n/a	4,300	3,325	52,041	n/a	869	375	47,932	33
2012	1,539	2,527	32,666	n/a	3,975	2,806	48,822	n/a	800	0	45,000	36
2013	1,560	0	28,401	n/a	3,839	3,723	49,203	n/a	1,200	16,210	60,000	48
2014	1,506	4,100	23,126	n/a	4,383	5,162	47,038	n/a	1,844	0	52,244	77
2015	1,632	2,354	23,110	14	4,225	11,379	53,252	11	1,669	67	57,932	32
2016	1,829	0	23,652	14	4,045	515	38,854	8	1,527	0	36,027	20
2017	1,759	2,015	25,759	18	4,422	4,082	37,327	9	1,686	600	36,581	20
2018	1,819	0	24,117	13	4,579	6,278	48,242	10	1,631	0	32,902	38
10 yr. av.	1,623	2,034	26,934	15	4,280	5,070	48,427	10	1,363	1,771	46,411	37
3 yr. av.	1,802	672	24,509	15	4,349	3,625	41,174	9	1,615	200	35,170	26

Source: AM 2009-2017 reports; AM 2018 survey; see Appendix C

Notes: ¹ Separate landbanks information for soft sand and sharp sand and gravel n/a before 2014 - prior to this the combined land banks for all sands and gravels (rounded to nearest year) were: 2010 – 8, 2011 – 8, 2012 – 10, 2013 – 9, 2014 – 9. Landbanks are calculated by dividing reserves – tonnage with planning permission – by the LAA Rates (thousand tonnes per annum) provided by the mineral planning authorities in their Local Aggregates Assessments 2019 – see Table 5 and Section 12 below

- 5.3 **Soft sand quarries:**
- Sales have increased by more than 30% since 2009 and recent sales are 11% above the general average.
 - Reserves of soft sand in 2018 are about the same as the 3-year average reserves but 12% below the 10-year average.
 - The soft sand landbank is 13 years, but lower than the average landbanks over the last decade.
 - The average reserves replenishment rate (permissions tonnage divided by sales tonnage) over the last 10 years is 1:12, but over the last three years this has declined to 0.37.
- 5.3 **Sharp sand and gravel quarries:**
- The 2018 sales are the highest since 2009 and 6-7% higher than 10-year and 3-year sales averages.
 - The reserves are a little below the 10-year average, but well above the 3-year sales average.
 - The quarry landbank in 2018 for sharp sand and gravel quarries was 10 years, which is about the same for the last decade.
 - The replenishment rate over the last 10 years is 1.25 but over the last three years this has declined to 0.37.
 - Less than 5% of sand and gravel sales were for non-aggregates use.
- 5.4 **Crushed rock quarries:**
- The 2018 sales are above the general average sales level, but lower than recent sales average.
 - Reserves are lower than the both recent and general levels, but despite this the landbank is at 38 years. However, whilst it is noted the average landbank over the last three years was lower at 26 years, this is still more than twice the minimum 10-year requirement level. Quarried crushed rock sales from quarries is the smallest contributor to quarry sales in the South East with 68% used for roadstone, and graded aggregate purposes, the rest for fill. Only about 70,000 tonnes of the crushed rock sales were for non-aggregates purposes.
- 5.5 **Mineral planning authority** data is illustrated in Table 5 below.
- Soft sand sales, reserves/landbanks are concentrated in Kent, Oxfordshire and West Sussex. It is noted both Berkshire, Hampshire and West Sussex have less than seven years landbank.
 - Sharp sand and gravel sales are more generally spread, but Buckinghamshire, Hampshire and Oxfordshire sell most. The reserves expressed in terms of landbank are concentrated in Berkshire, Kent and Medway, and Oxfordshire. It is noted that East

Sussex has a low landbank at less than seven years. The overall South East landbank is 10 years, about 40% above the minimum required.

- Crushed rock sales and reserves are principally in Kent and Oxfordshire but the landbank appears to be generous at 38 years.

Table 5: Sales, permissions and reserves at soft sand, sharp sand and gravel and crushed rock quarries for mineral planning authorities¹ - 2018

Thousand tonnes (unless specified otherwise)															
	Soft Sand					Sharp Sand and Gravel					Crushed Rock				
Mineral planning authority	Sales 2018	Permit 2018	Reserve end 2018	LAA Rate ² (ktpa)	Land-bank ³ (yrs.)	Sales 2018	Permits 2018	Reserve end 2018	LAA Rate ² (ktpa)	Land-bank ³ (yrs.)	Sales 2018	Permit 2018	Reserve end 2018	LAA Rate ² (ktpa)	Land-bank (yrs.) ³
Berkshire Unitaries	c	0	c	c	<1	c	250	c	817	10	n/a	n/a	n/a	n/a	n/a
Bucks/MK	c	0	c	c	31	1,075	2,018	9,283	910	10	n/a	n/a	n/a	n/a	n/a
E. Sussex	c	0	350	n/a	n/a	297	0	508	160	1.5	n/a	n/a	n/a	n/a	n/a
Hampshire	227	0	634	230	3	955	760	8,433	920	9	n/a	n/a	n/a	n/a	n/a
Isle of Wight	11	0	170	19	9	65	0	500	59	8	c	0	c	0	c
Kent/Med.	493	0	8,296	542	15	251	0	4,872	451	11	c	0	c	78	c
Oxfordshire	252	0	3,091	243	13	797	3,000	12,925	1,015	13	751	0	7,718	778	c
Surrey	439	0	7,178	400	18	468	250	2,731	500	5	c	0	c	n/a	c
W. Sussex	305	0	c	372	6	c	0	c	34	23	n/a	n/a	n/a	n/a	n/a
South-East England	1,819	0	24,0117	1,919	13	4,579	6,278	48,242	4,866	10	1,631	0	32,902	856	38

Source: AM 2018 c = confidential

¹ Some mineral planning authorities grouped to facilitate data confidentiality

Notes ² LAA Rates (thousand tonnes per annum) provided by the mineral planning authorities in their Local Aggregates Assessments 2019 – see Section 12 below

³ Landbanks presented to nearest whole number

6 Wharves

6.1 Aggregates wharves' sales and estimated demand, the LAA Rates, are illustrated in Table 6, overleaf, and Appendix D.

- Sales in 2018 of **marine sand and gravel** of 5.9mt are below both 3-year and 10-year average sales.
- The **Crown Estate** recorded marine sand and gravel landings (NB not sales) of 6.3mt in 2018² at the South East wharves. This was produced from the East Coast (1.42mt), Thames Estuary (0.46mt), South Coast (3.46mt) and East English Channel (0.96mt) licensed dredging areas.
- There are some sales of **quarried sand and gravel**, most is imported from continental Europe, particularly Denmark. However, it appears that some wharves (and rail depots) have recorded in the AM survey sales that were originally recorded as sales at the Cliffe wharf and rail depot in Medway (and possibly elsewhere) and subsequently distributed to other wharves and rail depots. There is insufficient data to clarify the situation.
- **Imported crushed rock** sales of almost 2.5mt in 2018 reflect the level of recent average sales, which are 27% above the general average sales level. It is sourced from Northern Ireland, Ireland, Scotland, France and Norway.
- The **Kent/Medway wharves** are the most significant element in wharves sales in the South East, and are particularly dominant with regard to imported crushed rock.

6.2 Wharf capacity is discussed in Section 9 below. However, the Crown Estate advise that there are significant marine aggregates reserves available, based on 10-year average annual 'offtake':

- East Coast -15 years;
- Thames Estuary – 34 years;
- East English Channel – 18 years; and
- South Coast – 29 years.
- There appear to be no immediate resource constraints on the supply of marine aggregates, however infrastructure and other investment limitations maybe an issue. It is noted that there are three new dredgers³ being commissioned to augment the aging (average age of vessel is 20 years) British fleet⁴.

² Marine aggregates Capability & Portfolio 2018 (data correct to 31 March 2018)

³ Mineral Products Today Summer 18

⁴ The Crown Estate consider constraint on supply might be fleet capacity.

Table 6: Sales of marine sand and gravel, imported crushed and quarried sand and gravel at wharves for groups of mineral planning authorities – 2009-2018
 Thousand tonnes (unless specified otherwise)

Mineral ¹ Planning Authority	Aggregates ²	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018		10-year average	3-year average	LAA ⁴ Rate
		Sales	Sales	Sales	Sales	Sales	Sales	Sales	Sales	Sales	Sales	% ³			
Hampshire & Isle of Wight	Marine S&G	1,157	1,213	1,279	1,190	1,511	1,459	1,638	1,654	1,242	1,507	26	1,385	1,468	1,654
	Imported Crushed Rock	25	44	34	33	31	1	26	67	38	48	2	36	51	
	Quarried S&G	n/a	n/a	n/a	n/a	n/a	n/a	4	4	5	5	2	n/a	5	
East & West Sussex	Marine S&G	701	686	1,475	1,735	1,694	1,626	1,601	1,775	1,457	1,350	23	1,410	1,527	1,890
	Imported Crushed Rock	108	235	186	249	95	93	89	114	206	138	6	151	153	
	Quarried S&G	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	33	10	n/a	11	
Kent & Medway	Marine S&G	3,127	2,680	3,012	3,229	3,215	3,524	3,588	3,927	3,525	3,048	52	3,288	3,500	5,850
	Imported Crushed Rock	1,344	1,602	1,724	1,194	1,402	1,372	2,062	2,415	2,002	2,291	92	1,741	2,236	
	Quarried S&G	NA	NA	NA	NA	NA	NA	175	231	311	287	88	n/a	276	
South East England	Marine S&G	4,985	4,579	5,766	6,153	6,420	6,609	6,827	7,356	6,224	5,905	100	6,082	6,495	9,394
	Imported Crushed Rock	1,452	1,881	1,944	1,476	1,528	1,466	2,177	2,596	2,246	2,477	100	1,924	2440	
	Quarried S&G	n/a	n/a	n/a	n/a	n/a	n/a	179	235	322	325	100	n/a	294	

Source: AM 2018 survey

Notes: ¹ Mineral planning authorities grouped to facilitate data confidentiality

² There are movements between wharves and rail depots within the South East so there is a limited, albeit unquantifiable element of double counting in the data.

³ % rounded to nearest whole figure

⁴ LAA Rates (thousand tonnes per annum) provided by the mineral planning authorities in their Local Aggregates Assessments 2019 – see Table 5 and Section 12 below

7 Aggregates Rail Depots

7.1 Rail depot sales and estimated demand are illustrated in Table 7, overleaf, and Appendix E.

- **Imported crushed rock** sales at 4.5mt are at their highest since 2009 and the recent sales averages are 13% higher than the general sales averages.
- About 86% of crushed rock is sold as roadstone, railway ballast, for concreting aggregate and other screened product.
- Two thirds of sales are through the depots in the western part of the South East - Oxfordshire, Buckinghamshire, Berkshire and Hampshire.
- Somerset is the most important source of crushed rock material and its LAA 2016 indicates there are 35 years of crushed rock reserves. This suggests there are sufficient reserves to maintain the current level of supply and allow significant growth. Leicestershire is also an important provider, but there is concern about long-term resource availability, which SEEAWP has expressed concern over through the consultation of its LAA - see Appendix K. On the other hand, the critical constraint on supply to the South East is infrastructure capacity which is discussed in Section 9 below.
- **Sand and gravel** sold through the rail depots is of both marine and quarry origin and amounts to about 1.2mt which represents 21% of depot sales. Virtually all this is for aggregates purposes although a small amount (31,000 tonnes) is soft sand and even a smaller amount (14,000 tonnes) is for fill.
- Sand and gravel largely originate from outside the South East. 65,000 tonnes are from Belgium and 103,000 tonnes seem to arrive via the Medway wharf/rail depot.

Table 7: Sales of crushed rock, marine and quarried sand and gravel at rail depots for groups¹ of mineral planning authorities – 2009 - 2018

Thousand tonnes (unless specified otherwise)

Authority	Aggregate	Sales of, imported crushed rock, marine sand and gravel and, quarried sand and gravel													LAA Rate
		2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	%	10-year average	3-year Average	
Buckinghamshire, Milton Keynes and Oxfordshire	Crushed Rock	447	729	659	552	762	975	918	1,009	1,021	1,006	22	807.8	1,012	1,036
	Sand & Gravel	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	13	32	3	n/a	23	
Berkshire, Hampshire & Isle of Wight	Crushed Rock	1,094	1,054	1,215	1,222	1,090	1,208	1,565	1,381	1,733	2,010	45	1357.2	1,708	1,945
	Sand & Gravel	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	190	206	17	n/a	198	
Surrey, East & West Sussex	Crushed Rock	621	888	949	1,000	1,192	1,688	1,456	820	993	954	21	1056.1	922	1,723
	Sand & Gravel	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	293	390	32	n/a	342	
Kent & Medway	Crushed Rock	414	356	446	313	465	533	445	457	475	535	12	443.9	489	1,080
	Sand & Gravel	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	32	591	48	n/a	312	
South East England	Crushed Rock	2576	3027	3269	3087	3509	4404	4384	3667	4222	4,505	100	3665	4,131	5,784
	Sand & Gravel	n/a	n/s	n/s	n/a	n/a	n/a	n/a	467	528	1,219	100	n/a	738	

Notes: ¹ Mineral planning authorities grouped to facilitate data confidentiality

² LAA Rates (thousand tonnes per annum) provided by the mineral planning authorities in their Local Aggregates Assessments 2019 – see Section 12 below

8 Secondary and Recycled Aggregate Facilities

8.1 Sales from **recycled and secondary aggregates** facilities are illustrated in Table 8, below.

- 2018 sales of recycled aggregate were just over 4mt, below 2017 levels.
- The main sales of recycled aggregate are from Surrey, Kent & Medway and Hampshire, which account for 63% of the total.
- Secondary aggregate sales are 0.56mt with incinerator bottom ash (IBA) as the major contributor.
- Sales of secondary aggregate are principally from East Sussex, Hampshire, Kent & Medway and Oxfordshire account for 89% of the total.
- Appendix A indicates recycled and secondary aggregate contribute about 17% to overall aggregates supply, but evidence from work undertaken by the MPA⁵ indicates that for Great Britain the average proportion is about 30%. This suggests the SEEAWP AM 2018 survey has not captured all the recycled and secondary aggregates data.
- The AM 2018 survey did cover road planings, although only a limited response occurred. There were returns from highway authorities of East Sussex, Hampshire, Kent, Medway, Surrey and West Berkshire which totalled 121,000, 163,000 and 194,000 tonnes for 2016, 2017, 2018 respectively. The Highways Agency also did not participate in the survey. Highway authorities indicated that a high proportion of road planings generated are recycled on-site.

⁵ [Contribution of Recycled and Secondary Materials to Total Aggs Supply in GB.pdf](#)

Table 8: Sales of recycled and secondary aggregates for mineral planning authorities - 2018

Thousand tonnes (unless specified otherwise)							
		Sales of recycled and secondary ¹ aggregates			% Total Sales	LAA Rate (ktpa)	
		2018	10-year average ²	3-year average			
Berkshire Unitaries	Recycled	460	11%	n/a	470	12%	547
	Secondary ⁴	0			0	0	
Bucks/Milton Keynes	Recycled	95	2%	n/a	82	2%	12
	Secondary	0			0	0	
East Sussex	Recycled	627	11%	n/a	308	8%	378
	Secondary	62	15%		40	9%	
Hampshire	Recycled	594	15%	n/a	654	16%	850
	Secondary	127	35%		106	25%	
Isle of Wight	Recycled	94	2%	n/a	73	2%	73
	Secondary	0			0	0	
Kent & Medway	Recycled	738	18%	n/a	845	21%	959
	Secondary	57	16%		77	18%	
Oxfordshire	Recycled	292	7%	n/a	345	9%	926
	Secondary	114	31%		107	25%	
Surrey	Recycled	1,065	26%	n/a	981	25%	1,000
	Secondary	8	2%		99	23%	
West Sussex	Recycled	254	6%	n/a	240	6%	446
	Secondary	1	0%		0	0	
South East England	Recycled	4,045	100%	n/a	3,998	100%	5,160
	Secondary	364	100%		429	100%	

Source: AM 2018 survey; AM reports 2017-2018

Notes: ¹Majority of secondary aggregates are sourced from **incinerator bottom ash (IBA)** - 224,000t – with Hampshire as the largest supplier at 116,000t and **recycled glass** – 112,000t

² Insufficient time series data to calculate 10-year average

³ LAA Rates (thousand tonnes per annum) provided by the mineral planning authorities in their Local Aggregates Assessments 2019 – see Table 5 and Section 12 below

⁴ Tonnage of blocks manufactured in West Berkshire discounted as the pulverised fly ash used is attributed elsewhere.

9 Aggregates Infrastructure Capacity

- 9.1 Aggregates infrastructure capacity information for wharves and rail depots is illustrated in Table 9 below and that for quarries and recycling/secondary aggregates facilities in Appendix D. However, the AM 2018 information has to be treated with a degree of caution as survey returns were not always complete. This is particularly relevant regarding the capacity of wharves and depots, which are frequently 'established uses' not subject to planning or other controls that limit their throughput. Accordingly, any conclusions cannot be fully relied on, although it is hoped AM 2019 might be able to address this. In the meantime the current information can provide an impression of the situation and the view has been expressed at SEEAWP meetings that a capacity margin of less 25% might indicate a potential problem for future aggregates supply.
- 9.2 By way of explanation the reference to 'Capacity Margin %' in the tables refers to capacity 'headroom', which is the difference between capacity in mtpa and potential demand forecast as reflected in the LAA Rate expressed as a %. (The table footnotes explain the arithmetic)
- 9.3 **Quarry capacity** information is illustrated in Appendix D.
- Overall capacity margins are between 42-60%, with crushed rock quarries exhibiting the largest head room.
 - There is variation in quarry capacity across South East England, although it is only Hampshire that has a capacity margin lower than 25%.
 - Soft sand quarries capacity margins for individual mineral planning authorities are largely not illustrated to protect confidential information.
- 9.4 **Aggregates wharf** capacity margins for the wharves are illustrated in Table 9 below:
- Overall there is a capacity margin of 16%, which is significantly lower than 25%.
 - This varies over South East England with virtually no margin for Hampshire/ Isle of Wight and the highest, 20% for Kent/Medway
 - The reliability of wharf capacity data needs to be taken into account when considering the information and because of underreporting there is likely to be higher capacity margins generally.
 - Moreover, there is undoubted variation within the grouping of mineral planning authorities in Table 9. Evidence submitted to the Kent Minerals/Waste Site Plans public examination in 2019 indicated that the Kent wharves had more than enough capacity met future needs. On the other hand, the Hampshire LAA notes the need to identify more wharf infrastructure.
- 9.5 **Aggregates rail depot** capacity is also illustrated in Table 9:
- Overall there is a capacity margin of 25% for South East England.

- The Milton Keynes/Oxfordshire depots have the least margin at 11% and Surrey/East Sussex/ West Sussex the next at 19%. However, East Sussex consider depot capacity is not under pressure.
- Notwithstanding the data limitations there appears to be capacity issues particularly for the depots serving Buckinghamshire, Milton Keynes and Oxfordshire. Oxfordshire CC have noted in the past there could be capacity pressures.

9.6 The information on **recycled and secondary aggregates sites capacity** is in Appendix F.

- The capacity margin for the sites overall in South East England is 57%.
- Only three mineral planning authorities have a margin of less than 50%, East Sussex 33%, Oxfordshire -7% and Surrey 18%.

The negative margin for Oxfordshire's is likely to be a data collection issue.

9.7 In the light of some uncertainty about capacity information, which currently indicates some pressures on some facilities particularly wharves, this will have to be considered further in the next Annual Report.

Table 9: Capacity¹ at aggregates wharves and rail depots - 2018

Mineral Planning Authorities ¹	Thousand tonnes (unless specified otherwise)					
	Wharves			Rail Depots		
	LAA Rate	Capacity 2018	Capacity Margin ² %	LAA Rate	Capacity 2018 ²	Capacity Margin ³ %
Buckinghamshire⁴, Milton Keynes & Oxfordshire	n/a	n/a	n/a	1,036	1,165	11
Berkshire, Hampshire & Isle of Wight	1,654	1,660	<1	1,945	3,100	47
Surrey, East & West Sussex	1,890	2,161	13	1,723	2,130	19
Kent and Medway	5,850	7,300 ⁵	20	1,080	2,480	56
South East England	9,394	11,121	16⁴	5,784	8,875	25

Source: AM 2018 survey

¹ Mineral planning authorities are grouped to maintain confidentiality of company data, but

Notes: there can be significant variations between the authorities

² Capacity data limited – see para. 9.2 above

³ A percentage estimate of spare capacity or 'headroom' calculated by dividing the LAA Rate by Capacity (converted into a %) minus 100%.

⁴ This grouping of mineral planning authorities does not have wharves, likewise

Buckinghamshire and the Isle of Wight have no rail depots

⁵ Informed by joint Kent and Medway wharf study (2010)

10 Aggregates Facilities and the Environment

- 10.1 South East England includes large areas of land ‘designated’ for their environmental importance (see Figures 3A/3B below_ that can constrain opportunities to develop aggregates facilities. These include the New Forest and South Downs National Parks and the following Areas of Outstanding National Beauty (AoNBs):
- Chichester Harbour;
 - Chiltern Hills;
 - Cotswolds;
 - Cranborne Chase and West Wilts Downs;
 - High Weald;
 - Isle of Wight;
 - Kent Downs;
 - North Wessex Downs; and
 - Surrey Hills.
- 10.2 There are significant aggregates resources, particularly soft sand, within these designations, but national policy permits quarries within them only under ‘exceptional circumstances’. Nevertheless, there are number of quarries and other aggregates facilities within these designations as illustrated in Figures 3A/B and listed in Appendix I. In 2018, no planning applications were outstanding or were permitted within these areas (see Appendix G).
- 10.2 Other designations that have the potential to affect aggregates developments are Sites of Special Scientific Interest (SSSIs) and National Nature Reserves, some of these are within ‘European Sites’ covered by the Birds Directives and Special Areas of Conservation (SACs). Such designations do not necessarily presume against mineral development, but are subject to a variety of tests. During 2018 only one application, in Buckinghamshire (see appendix G) in such designations was permitted and there are no outstanding applications elsewhere in South East England.
- 10.3 Green Belts are a further significant constraint as they severely restrict ‘inappropriate development’. In the South East of England there are the following Green Belts – illustrated in Figures 3A/3B:
- Bournemouth/South West Hampshire;
 - Oxford; and the
 - Metropolitan Green Belt (affecting parts of Buckinghamshire, eastern Berkshire, Surrey and north Kent).
- Minerals extraction within Green Belts is not necessarily ‘inappropriate’ and in 2018 the Buckinghamshire quarry noted above was also in the Metropolitan Green Belt.

10.4 Appendix I records whether South East England aggregate operations/facilities are situated in environmental designations or Green Belts.

Figure 3A: South East England (W): Location of primary aggregates facilities - 2018

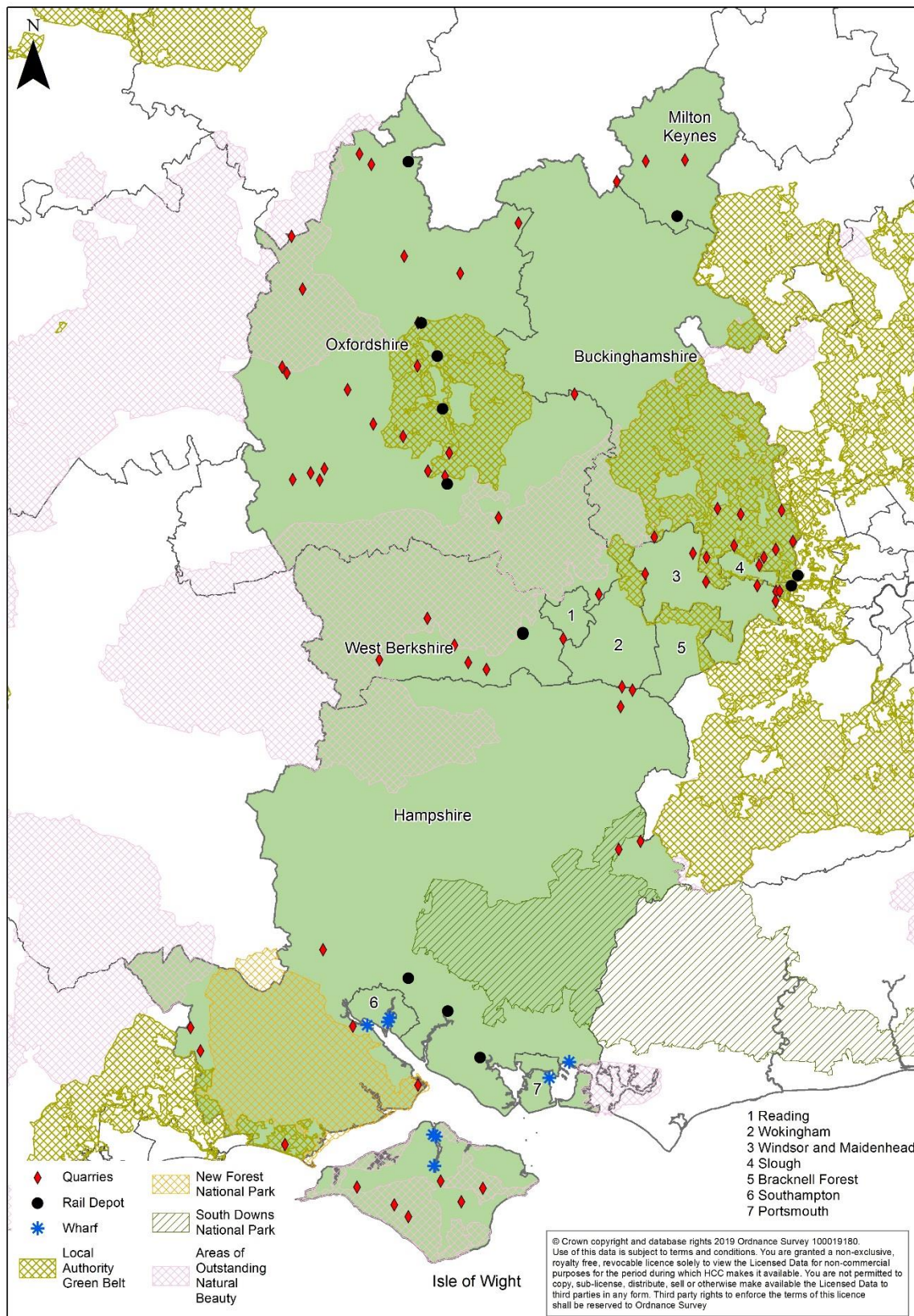
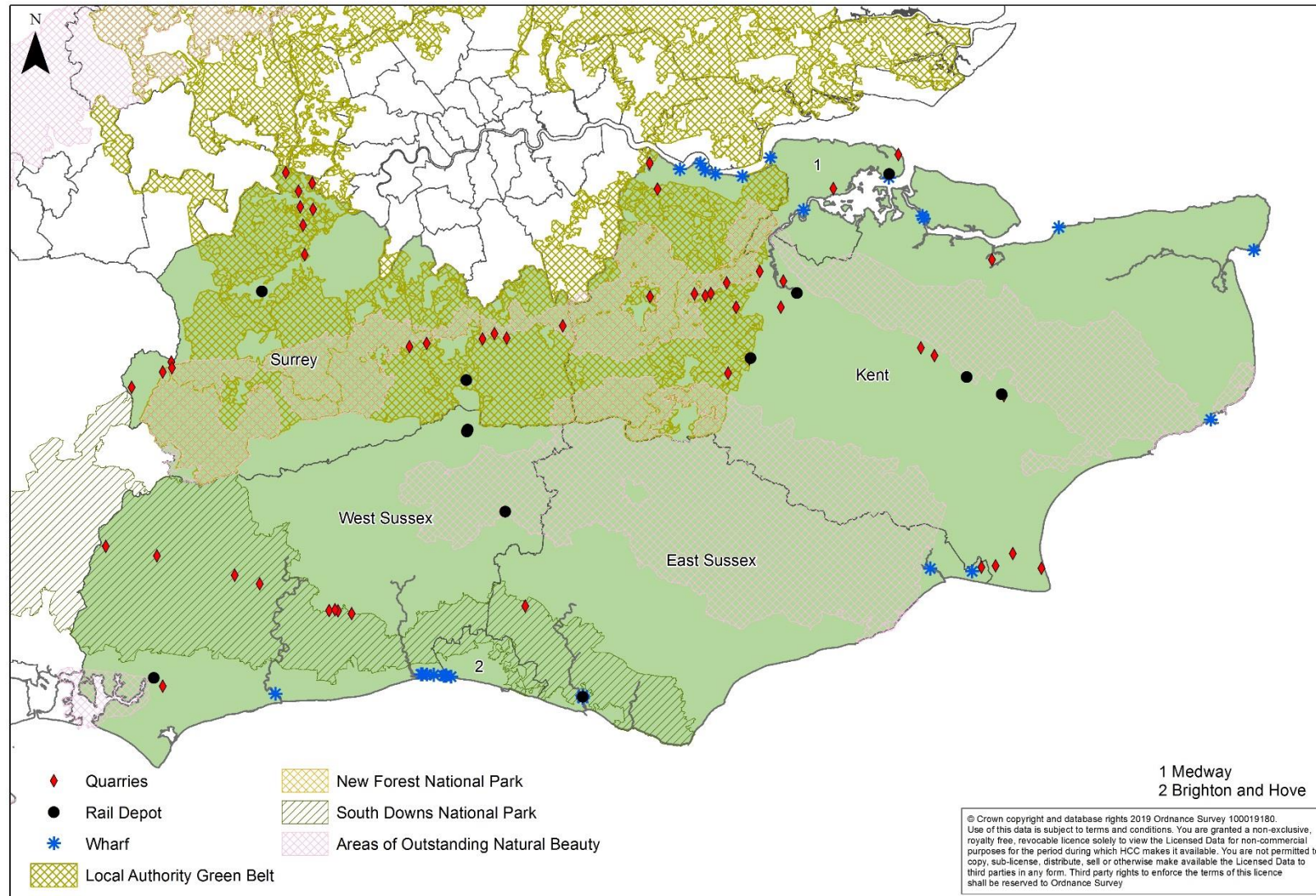


Figure 3B: South East England (W): Location of primary aggregates facilities - 2018



11 Minerals Plans and Planning Applications

- 11.1 Progress on plans is detailed in Appendix B. All mineral planning authorities in the South East have mineral plans although some are out of date and replacement plans are under preparation.
- 11.2 Off shore aggregate resources are covered by the Marine Plans. The East Marine Plans and the South Marine Plans are now adopted. Consultation events on the South East Marine Plan have been organised by the Marine Management Organisation (MMO). The MMO has adopted a common policy approach for aggregates in all the Marine Plans, which is supportive of continuing supply.
- 11.3 Appendix G provides information on the status of planning applications in 2018, while Table 5 indicates 6.3mt of additional sharp sand and gravel reserve was added to the stock in the South East. Appendix G also shows that 9.8mt of sharp sand and gravel (about two years of reserve); 2.8mt of soft sand (about 1.5 years of reserve); and 1.4mt of crushed rock (one year of reserve) is under consideration. Additionally, 0.54mtpa of wharf capacity and 0.21mtpa of rail depot is awaiting decision.

12 Local Aggregates Assessments

- 12.1 All the South East England mineral planning authorities have submitted LAAs for 2019 based on AM 2018 data. The LAAs have included LAA Rates as indicators of demand for aggregates supplied from quarries and other facilities and are recorded in the tables above as well as Table 10 below. The LAAs individually and collectively provide the foundation of the information on which SEEAWP can assess whether South East England is **making a full contribution towards meeting both national and local aggregate needs**.
- 12.2 Consolidated critical information from the LAAs is presented in Table 10 below. Taking this into account and that of individual LAAs these are the following main findings;
- Generally, aggregates sales are above past average levels except for marine sand and gravel, which has slightly declined. However, the sales performance does vary, with East Sussex, Milton Keynes and West Berkshire showing declining sales. This appears to relate to low reserves but to a degree compensated by higher rail depot sales. Recycled and secondary aggregate sales performance seems to be comparable with previous sales.
 - Overall collective aggregates reserves are above the sand and gravel 7-year minimum requirement, threshold, but there are a number of mineral authorities that are below this level:
East Sussex 1.5 years (SSG);

Hampshire 3 years (SS);
Milton Keynes 5 years (SSG);
West Berkshire < 1 year (SS); and
West Sussex 6 years (SS).

- Regarding aggregates sales through the wharves, it is noted sales of sand and gravel are lower than past levels. Although crushed rock sales have increased, they are only just above the 3-year average sales level. There may be capacity issues for the wharves, but this conclusion could arise from the unreliability of the AM survey data reliability. This matter will require further investigation in subsequent LAAs and Annual Reports.
- Sales of aggregates through the rail depots appears to be increasing and overall there is adequate capacity. Although the overall capacity margin is 25% it is less in other areas, particularly Oxfordshire, Buckinghamshire, Milton Keynes. However, individual mineral planning authorities might have more capacity.
- Recycled and secondary aggregates facilities have a generous capacity, generally margin, although both Oxfordshire and Surrey seem to be more limited.
- Planning applications yet to be determined or implemented might address reserve and capacity deficit problems in some instances. Additionally, unused allocations in mineral plans have the potential to do the same. However, not all these opportunities are not fully addressed in some LAAs so the full picture is unclear.
- Several of the mineral planning authorities are preparing mineral plans that could address any outstanding shortfalls in reserves and capacity over the next 15-20 years.

Table 10: Aggregates assessment summary for South East England - 2018

Thousand Tonnes (unless specified otherwise)							
Aggregates	Sales	Average 10-year sales	Average 3-year sales	LAA ¹ Rate	Reserve or Capacity ²	Land-bank (Years)	Capacity ³ Margin %
Quarried Soft Sand	1,819	1,623	1,802	1,919	24,117	13	45
Quarried Sharp Sand and Gravel	4,579	4,280	4,349	4,866	48,242	10	51
Quarried Sand & Gravel ⁴	6,399	5,906	6,160	6,785	72,359	11	49
Quarried Crushed Rock	1,631	1,364	1,615	856	32,902	38	60
Wharves (S&G)	5,905	6,082	6,376	9,394	11,121		16
Wharves (CR)	2,477	1,924	2,440				
Rail Depots (CR+S&G)	5,726	3,665	4,869				5,784
Recycled/ Secondary Aggregate	4,581	n/a	4,497	5,160	12,020		57
Comment	See 12.2 above						

Source: AM 2018 survey, AM reports 2009-2018, LAAs 2019

¹ Based on LAA Rates included in the LAAs 2019.

² Capacity data limited – see para. 9.2 above

³ A percentage estimate of spare capacity or ‘headroom’ calculated by dividing the LAA

Notes: Rate by Capacity (converted into a %) minus 100%, also note ² above.

⁴ Soft sand and sharp sand and gravel combined included for comparisons with Fig.2 and Appendices A, B, C.

13 Conclusions

13.1 During 2018 SEEAWP met three times, and considered

- General aggregates issues;
- Managed and reported on the Aggregate Monitoring 2017 survey;
- Responded to consultations, particularly the draft revisions to the NPPF;
- Scrutinised 2018 LAAs.

13.2 With regard to the question whether South East England is making a full contribution to aggregate supply, in the past SEEAWP looked to the national and regional guidelines for assistance to answer this. Now, in the absence of update guidelines SEEAWP now relies on current LAAs for consideration of the latest AM information and relevant economic data. Judging by the consolidated findings from current LAAs 2019 (outlined in Section 12) and Table 9 above - **South East England is making a ‘full contribution’** to aggregates needs. This

is due to the fact that overall the quarry landbanks meet the minimum requirement of 7-years based on the 2018 LAA Rates provided by the mineral planning authorities. However, it is noted there are pressures on the sand and gravel quarry reserves for some mineral planning authorities, which do not meet the minimum requirement and others, if there is insufficient replenishment. It is also noted that there is some 25% capacity margin for aggregates rail depots and even more for recycling/secondary aggregates facilities. Even so, some of the mineral planning authorities have noted potential rail depot capacity issues for the future. There is also a query concerning the capacity at the aggregates wharves where a capacity margin overall of 16% has been recorded. This is likely to be a survey issue, which will need to be reviewed in the next Annual Report. It is expected that there is more capacity than currently recorded by AM 2018.

- 13.3 These issues might potentially be addressed by applications for additional quarry reserves and/or aggregates facilities capacity awaiting determination. Furthermore, allocations and policy support in mineral plans could provide additional confidence over aggregates supply. However, not all the LAAs fully consider these points so SEEAWP cannot reach a full conclusion.
- 13.4 It is noted that several mineral planning authorities are preparing replacement or additional mineral plans.

This page is intentionally blank

Appendix A: Aggregates sales for South East England - 2009-2018

Thousand tonnes													
Year	Sand and Gravel (Quarried)		Crushed Rock (Quarried)		Marine dredged Sand and Gravel Sold at Wharves		Crushed Rock Sold at Wharves		Crushed Rock Sold at Rail Depots		Recycled & Secondary Aggregate		Total Aggregate Sales
	Sales	% Total Sales	Sales	% Total Sales	Sales	% Total Sales	Sales	% Total Sales	Sales	% Total Sales	Sales	% Total Sales	
2009	6,007	37%	1,300	8%	4,985	31%	1,452	9%	2,576	16%	n/a ¹	n/a ¹	16,320
2010	6,091	31%	1,100	6%	4,579	23%	1,881	10%	3,027	15%	2,900	15%	19,578
2011	5,824	28%	900	4%	5,766	28%	1,944	9%	3,269	16%	2,800	14%	20,503
2012	5,514	28%	800	4%	6,153	31%	1,476	7%	3,087	15%	2,900	15%	19,930
2013	5,399	25%	1,200	6%	6,420	30%	1,528	7%	3,509	16%	3,700	17%	21,756
2014	5,889	25%	1,800	8%	6,609	28%	1,466	6%	4,404	17%	3,628	15%	23,448
2015	5,857	24%	1,700	7%	6,827	28%	2,177	9%	4,384	16%	4,223	17%	24,824
2016	5,900	24%	1,527	6%	7,356	29%	2,596	10%	3,667	15%	4,034	16%	25,080
2017	6,181	24%	1,686	7%	6,224	24%	2,246	9%	4,222	17%	4,875	19%	25,434
2018	6,399	25%	1,631	6%	5,905	23%	2,477	10%	4,505	18%	4,581	18%	25,499
10 Year Average	5,906	26%	1,364	6%	6,082	27%	1,924	9%	3,786	17%	3,738	17%	22,306
3 Year Average	6,160	24%	1,615	6%	6,495	26%	2,440	10%	4,131	16%	4,497	18%	25,338

Source: AM 2009-18

Notes: ¹No data for 2009 – average sales based on 9 years of records

Appendix B: Sales, permissions, reserves at sand and gravel quarries 2009-2018

Thousand tonnes

Year	Sand and gravel				
	Sales	% change on: previous year / 10/3 years	Permissions in year	Reserve end of year	Land-bank (years)
2009	6,007	-18	11,679	83,457	6.3
2010	6,091	+3	10,238	88,096	6.6
2011	5,824	-6	4,095	84,863	6.4
2012	5,514	-5	5,333	81,488	6.2
2013	5,399	-2	3,723	77,604	9
2014	5,889	+9	9,262	70,174	9
2015	5,857	< -1	13,733	76,362	9.5
2016	5,900	<1	515	73,747	9
2017	6,181	+4	6,097	72,035	9
2018	6,399	+4	6,278	72,359	11
10-year average	5,298	11	n/a	78,019	
3-year average	6,160	9	n/a	72,714	

Source: AM 2009-2018 surveys

Appendix C: Sales, permissions and reserves of sand and gravel quarries by mineral planning authority - 2018

Thousand tonnes						
	Sand and Gravel (Soft sand and sharp sand and gravel)					
Mineral Planning Authorities	Reserve at start of year	Sales during year	Permitted during year	Reserve at end of year	LAA Rate	Land-bank (years)
Berkshire Unitaries	8,641	567	250	8,500	861	10
Bucks/ Milton Keynes	10,863	1,144	2,018	11,455	980	12
East Sussex	1,155	297	0	858	160	1.5
Hampshire	7,920	1,182	760	9,067	1,150	8
Isle of Wight	738	77	0	671	78	9
Kent/ Medway	13,963	745	0	13,168	993	13
Oxfordshire	13,910	1,049	3,000	16,015	1,258	13
Surrey	10,914	908	250	9,910	900	11
West Sussex	3,125	430	0	2,715	406	8
South East England	71,229	6,399	6,278	72,359	6,785	11

Source: AM 2018

Appendices D: Capacity at quarries and recycling/secondary aggregates sites for each mineral planning authority - 2018

Thousand tonnes p.a./%								
Mineral planning authorities	Quarries			Recycled/ secondary aggregate sites	Quarries			Recycled/ secondary aggregate sites
	Soft sand	Sharp sand &/ gravel	Crushed rock		Soft sand	Sharp sand &/ gravel	Crushed Rock	
	Estimated Capacity				Capacity Margin ¹ %			
Berkshire Unitaries	60	1,607	0	1,186	C	51	0	54
Bucks/Milton Keynes	C	2,145	0	450	C	59	0	88
East Sussex	350	508	0	520	n/a	68	0	33
Hampshire	C	1,037	0	2,369	C	11	0	64
Isle of Wight	26	80	C	180	C	26	C	59
Kent & Medway	920	1,532	C	4,133	C	71	C	77
Oxfordshire	390	1,624	1,700	861	38	38	54	0 ²
Surrey	1,221	1,000	0	1,226	C	60	C	18
West Sussex	502	C	0	1,096	C	C	0	59
South East England	4,247	9,499	2,120	12,020	56%	42%	60%	57%

Source: AM 2018 survey

Notes; ¹ A percentage estimate of spare or remaining capacity/ 'headroom' calculated by dividing the LAA Rate by Capacity minus 100%

² Anomalous data as LAA Rate higher than capacity so recorded as 0%

Appendix E: Major* aggregates mineral planning decisions in South East England - 2018

Berkshire Unitary Authorities (excluding West Berkshire)										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Poyle Quarry Extension	501987, 176087	Quarry Extension	Sand and Gravel	Summerleaze Ltd	250,000	Permitted				
Bridge Farm	475021, 167471	New Quarry	Sand and Gravel	CEMEX	3,600,000	Undetermined				
Riding Court Farm	499500, 177400	Temporary Recycled Aggregate Site	CD&E	CEMEX	30,000	Undetermined				
Buckinghamshire										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Slade Farm	496500, 188500	New Quarry	Sharp Sand and Gravel	RJD Ltd	1,250,000	Permitted			X	X

Red Brick Farm, Stewkley	484413, 224561	Recycled Aggregate site	CD&E	W J Doherty & Son	75,000	Permitted				
Land adjacent to Bishops House, Crown lane, Farnham Royal	495442, 183549	Recycled Aggregate site	CD&E	M&S Groundworks Grab Hire Ltd	75,000	Undetermined				x
Thorney Mill Rail Sidings	505079, 179337	Rail Depot	Sand and Gravel	Breedon Southern Ltd	210,000	Undetermined				X
Former Goods Yard	470543, 218138	Recycled Aggregate Site	CD&E	TLT Services	75,000	Withdrawn				
East Sussex										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Ashdown Brickworks	571953, 109525	Variation of condition	Export of sandy clay	lbstock	N/A	Permitted				
Fishers Wharf	545322, 100457	Wharf	Marine Sand and Gravel and Crushed Rock	Brett Aggregates Ltd	420,000	Permitted				
Plot 6&7 North Quay Road	544719, 101769	Wharf	Marine Sand and Gravel and Crushed Rock	FM Conway	120,000	Permitted				
Fishers Wharf	545322, 100457	Rail Depot	Marine Dredged	Brett		Permitted				

Plot 6&7 North Quay Road,	544719, 101769	Recycled Aggregate Site	Crushed Rock	FM Conway	20,000	Permitted				
Hampshire										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Downton Manor Farm	427425, 93058	Extension	Sand and Gravel	NMSB	760,000	Permitted				
Roeshot Quarry, Christchurch	418712, 94867	New Quarry	Sharp sand and gravel	Mr Bodorgan Properties	3,000,000	Undetermined				
Kingsley Quarry	478057, 137650	Extension	Soft Sand/Silica Sand	Tarmac	1,000,000	Undetermined				
Medway										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB

Malmaynes Hall Farm	581	Recycled Aggregate Site	CD&E	OCL Regeneration Ltd	75,000	Permitted				
Milton Keynes										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Land at Passenham Quarry (eastern extension), Calverton SS	478061, 239003	Quarry Extension	Sharp Sand and Gravel	GRS Roadstone	150,000	Permitted				
Land to north & east of Lathbury. Northampton Road, Lathbury	874770 457960	New Site	Sharp Sand and Gravel	Smith Aggregates Ltd	617,500	Permitted				
Oxfordshire										
Site name & location	Easting/ Northing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Bridge Farm Quarry, Sutton Courtenay	451500, 194500	Lateral Quarry Extension	Sharp Sand and Gravel	Hanson Quarry Products	500,000	Permitted				
New Barn Farm, Cholsey	460000, 187400	New Quarry	Sharp Sand and Gravel	Grundon Sand and Gravel Ltd	2,500,000	Permitted				

Sutton Courtenay Quarry, Sutton Courtenay	451500, 193400	Recycled Aggregate	CD&E	Hanson Quarry Products	50,000	Permitted				
White Cross Farm, Wallingford	460500 187700	New Quarry	Sharp Sand and Gravel	London Rock Ltd	550000	Undetermined				
Shellingford Quarry, Western	432300 193500	Lateral Extension	Soft Sand and Crushed Rock	Multi Agg Ltd	1,800,000 Sand, 1,000,000 Limestone	Approved subject to legal agreement 2019				
Fullamoor	453800 194900	New	Sharp Sand and Gravel	Hills Quarry Products Ltd	2,500,000	Refused 2019				x
Dix Pit, Stanton Harcourt	440300, 205000	Recycled Aggregate	CD&E	Sheehan Haulage & Plant Hire	75,000	Withdrawn				
Shipton on Cherwell Quarry	448200 216900	Lateral Extension	Crushed Rock (Limestone)	Shipton Ltd	400000	Refusal Subject to appeal				x
Surrey										
Site name & location	Easting/North ing	Type of development	Aggregate	Applicant	Reserve/ Capacity	Decision	Nat Park	AONB	SPA/SAC &SSSI/ NNR	GB
Mercers South Quarry		Extension	Sand	J&J Franks	250,000	Permitted				x
Shepperton Quarry, Littleton Lane		Recycled Aggregate	CD&E Recycling	Killoughery Waste Management Ltd		Refused				

* Only planning decisions that have an impact on aggregates supply/site capacity recorded

Appendix E: Key milestones for mineral plans in the South East - 2018

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
Bracknell Forest, Reading, Windsor and Maidenhead and Wokingham	Central and Eastern Berkshire Joint Minerals and Waste Plan 2016-2036	Issues and Options: June-July 2016 Preferred options: Early 2018	Winter 2018	Winter 2019	Spring 2020	Winter 2020	Bracknell Forest, Reading, Windsor and Maidenhead and Wokingham are collaborating to produce the Central and Eastern Berkshire Joint Minerals and Waste Plan.
Buckingham - shire	Minerals & Waste Core Strategy Replacement Minerals & Waste Local Plan	July-Aug 2007 Feb-Apr 2015	Sept 2011 Early 2018	Nov 2011 Spring 2018	Feb 2012 Summer 2018	Nov 2012 Late 2018/Early 2019	Core Strategy adopted Nov 2012 RMWLP to consider LP policies that were saved but not replaced & new policies and update/review Core Strategy policies. Additional Draft Plan consultation will be undertaken in August 2017.

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
East Sussex	East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan						Adopted 19 Feb 2013.
	East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan						Adopted 7 February 2017
	Review of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan	Call for Sites / Content (Reg18) took place Autumn 2017 Preferred Strategy Consultation (Reg. 18): Spring 2020?(not LDS date)*	Pre-Submission Consultation (Reg. 19): 2020?(not LDS date)*	Submission date: currently uncertain		TBC	*Timetable set in Local Development Scheme has slipped due to ongoing discussions regarding sand/gravel sites in the east of the County.

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
Hampshire (Portsmouth, Southampton, New Forest & South Downs)	Minerals and Waste Plan					October 2013	<p>The Hampshire Minerals & Waste Plan (HMWP) was adopted in October 2013.</p> <p>A Review of the HMWP was undertaken in 2018. The Review concluded an update was not required at the time and a commitment was made to Review the Plan again in 2020.</p>
Isle of Wight	Isle of Wight Core Strategy (including waste and minerals) and Development Management DPD					Mar 2012	<p>The Island Core strategy was adopted on 21 March 2012.</p>

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
Kent	Minerals & Waste Plan 2013 – 2030	Jan 2009- Jan 2014	Jan-Aug 2014	November 2014	April/May 2015	July 2016	Fresh Call for Sites required given the Preferred Options stage of both plans in 2012 now require updating.
	Mineral Safeguarding DPD.	February 2016 workshop Summer/Autumn 2017				April 2017	
	Minerals/Waste Sites Plans Call for Sites exercise autumn/winter 2016	RAG initial screening to give reasonable alternatives Spring/Summer 2017 Preferred Options (Reg 18) consultation Autumn/Winter 2017/18	Summer 2018	May 2019	October 2019 (modifications consultation Jan 2020)	Spring/Summer 2020	

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
Medway	Some saved policies from Kent Minerals Local Plan still applicable: Brickearth (May 1986) Construction Aggregates (Dec 1993)	Issues and Options consultation – Jan-Feb 2016	2017	Mar 2018	TBC	Dec 2018	New Local Plan currently being worked on – due for adoption in 2018.
Milton Keynes	Minerals Local Plan	Jan - Feb 2015	January 2016	March 2016	Oct 2016	July 2017	The Minerals Local Plan (adopted 2017) replaces the Minerals Local Plan (2006).
Oxfordshire	Minerals & Waste Local Plan: Part 1 - Core Strategy;	Feb-Apr 2014	Aug 2015	Dec 2015	Sept 2016	Sept 2017	Core Strategy adopted Sept 2017
	Minerals & Waste Local Plan: Part 2 – Site Allocations	January - March 2020	Autumn 2020	January 2021	Autumn 2021	Early 2022	Anticipated timetables - LDS subject to revision and approval.

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
Slough							A composite Local Plan is now in place demonstrating compliance with NPPF. Minerals Plan).
Surrey	Surrey Minerals Plan (Core Strategy and Primary Aggregates DPDs) Aggregates Recycling Joint DPD Minerals Site Restoration SPD	Issues and Options Consultation – Spring 2021	TBC	TBC	TBC	Summer 2023	Adopted 19 July 2011 Adopted 12 Feb 2013 Adopted 19 July 2011
West Berkshire	West Berkshire Minerals & Waste Local Plan	December 2013-September 2017	October – November 2017	December 2017	March /April 2018	June / July 2018	The Key Milestones are under review this timetable will be revised.

Mineral Planning Authority	Local Plan, DPD, SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Secretary of State (Reg 22)	Estimated date of EIP	Estimated date for Adoption	Comments
West Sussex	Waste Local Plan	Jun/July 2012	Nov 2012 – Jan 2013	March 2013	July 2013	Apr 2014	Joint plans in partnership with South Downs NPA. Waste Local Plan adopted April 2014
	Joint Minerals Local Plan						Adopted July 2018
	Soft Sand Review of the Joint Minerals Local Plan	January-March 2019	July-August 2019	September 2019	December 2019	July 2020	

Appendix F: Aggregates quarries and facilities – 2018

Berkshire Unitaries (excluding West Berkshire)					
Site	Facility Type	Operator	Eastings	Northings	Comments
Bray Quarry	SSG Quarry	Summerleaze Ltd	491211	178321	
Eversley Quarry, (Fleethill Farm)	SSG Quarry	Harleyford Aggregates Ltd	478500	162400	
Horton Brook Quarry	SSG Quarry	Aggregate Industries UK Ltd	501862	176848	
Kingsmead Quarry,	SSG Quarry	CEMEX	501774	175417	
<i>Poyle Quarry (extension to BMF)</i>	SSG Quarry	Summerleaze Ltd	502383	176895	
<i>Riding Court Farm (Datchets)</i>	SSG Quarry	CEMEX	499000	177700	
Sheephouse Farm, Maidenhead	SSG Quarry	Summerleaze Ltd	489257	182621	
<i>Star Works, Knowle Hill</i>	SS Quarry	<i>S Grundon Ltd</i>	482020	179530	
Colnbrook Rail Depot	Rail Depot	Aggregate Industries UK Ltd	504200	177700	
Bray Quarry	S/RA	Summerleaze	491387	178209	/
Colnbrook Rail Depot	S/RA	Aggregate Industries UK Ltd	504200	177700	/
Fleetwood Grab Services	S/RA	Fleetwood Grab Services	469251	174324	
Hythe End Farm	S/RA	Fowles Crushed Concrete	501627	172545	
Hindhay Quarry	S/RA	Summerleaze	486500	183100	I
Horwoods	S/RA	Kimber Lane	488572	178987	
<i>Riding Court Farm (Datchets)</i>	SSG Quarry	CEMEX	499000	177700	
Buckinghamshire					
Site	Facility Type	Operator	Eastings	Northings	Comments
All Souls Farm, Wexham	SSG Quarry	Tarmac Ltd	500000	182000	Green Belt
Beechwood Nurseries, East Burnham	SSG Quarry	Summerleaze Ltd	495500	183800	Green Belt
Berryhill Farm, Taplow	SSG Quarry	Summerleaze Ltd	491300	182000	Green Belt
Denham Park Farm	SSG / SS Quarry	Ingrebourne Valley Ltd	502700	189100	Green Belt
George Green	SSG Quarry	Brett Aggregates	499300	180800	Green Belt
New Denham	SSG Quarry	Summerleaze Ltd	504400	184400	Green Belt
Springfield Farm, Beaconsfield	SSG / SS Quarry	Springfield Farms Ltd	493000	189400	Green Belt
North Park	SSG Quarry	Cemex	502745	179484	Green Belt
Slade Farm	SSG Quarry	RJD Ltd	496500	188500	

<i>Thorney Mill Road, West Drayton</i>	<i>Rail Depot S/RA</i>	<i>Aggregate Industries</i>	<i>505171</i>	<i>179280</i>	<i>Green Belt</i>
Unit 13 Bisons Industrial Estate, Iver	S/RA	Cappagh Public Works Ltd	503300	180100	Green Belt
Lockshart Farm	S/RA	G Ives	486200	222800	
Summerleys Farm, Princes Risborough	S/RA	C Putnam & Sons	479600	203700	
Wapseys Wood	S/RA	Quattro	498500	189400	Green Belt
Chiltern View Nursery	S/RA	Westside Land Ltd	484700	209900	
Unit 54 Binders Industrial Estate	S/RA	Wycombe Recycling Ltd	487800	197100	Green Belt and AONB
Unit 44 Binders Industrial Estate	S/RA	Wycombe Traders & Skip Hire	487800	197100	Green Belt and AONB
<i>Slough Recycling</i>	<i>S/RA</i>	<i>Tarmac Ltd</i>	<i>500000</i>	<i>182000</i>	<i>Green Belt</i>
New Denham Quarry	S/RA	Summerleaze Ltd	504200	184600	Green Belt
Red Brick Farm	S/RA	W J Doherty & Son	484413	224561	
East Sussex (Including Brighton and Hove and SDNP)					
Site	Facility Type	Operator	Eastings	Northings	Comments
Scotney Court, Lydd	SSG Quarry	Brett Aggregates	600100	119900	
<i>Novington Sand pit</i>	<i>SS Quarry</i>	<i>Dudman Group</i>	<i>536700</i>	<i>114500</i>	<i>Within SDNP</i>
North Quay (Berth 1), Newhaven	Wharf	Newhaven Roadstone / Tarmac	544700	101600	
North Quay (Plot 6), Newhaven	Wharf	FM Conway Ltd	544700	101700	Permission granted for asphalt and concrete batching plant on Plots 6 & 7 utilising imported sea-borne aggregates using wharves at North. Initially Berth 5 would be used. At a later stage imports would be through one of the wharves adjacent to the proposal.
North Quay (Plot 7), Newhaven	Wharf	F M Conway Ltd	544700	101800	
North Quay (Berth 4), Newhaven	Wharf	European Metal Recycling	544700	101900	In use for scrap metal
North Quay (Berth 5), Newhaven	Wharf	Newhaven ERF	544700	102100	See above Plots 6 & 7.
Fishers Wharf, East Quay	Wharf	Brett Aggregates Ltd	545322	100457	Permission granted and implementation commenced for an aggregate processing plant, aggregate bagging plant, concrete batching plant & buildings, ancillary offices & stores for processing and utilising aggregates landed at Newhaven

					Port and distribution of the products by road & rail and the extension of an existing rail siding.
Rastrums Wharf, Rye	Wharf	Rastrum for various customers	598830	119316	
Rye Wharf (AKA "old ARC wharf")	Wharf		593000	119700	
Britannia wharf, Shoreham Port	Wharf	Day Group	526400	104700	
Halls Aggregate Wharf, Shoreham	Wharf	CEMEX UK Ltd	525682	104934	Straddles border between B&H and West Sussex
Ferry wharf, Shoreham Port	Wharf		526400	104700	Currently used for producing RA
Newhaven Railhead	Rail Depot	Day Aggregates	544700	101900	Imports RSA, crushed rock and sand and gravel
Go green waste recycling	S/RA	Mr Honeysett	552700	132000	
Hazelbank, Maresfield	S/RA	AM Skips	545900	125500	
Woodside depot, Hailsham	S/RA	Hailsham Roadway	557987	107198	
Woodland House	S/RA	R French & Sons	579300	110800	
Apex Way, Hailsham	S/RA	Haulaway Ltd	558100	109100	
Ashdown Brickworks	S/RA	Ibstock Ltd	572000	109500	
Land at Hole Farm, Westfield Lane, Westfield	S/RA	Taskforce Property Services Ltd	581095	113809	
Cophall Wood, nr Polegate	S/RA	PJ Skip Hire	557600	106700	
Chailey Brickworks	S/RA	Ibstock Ltd	539271	117624	
Ferry wharf, Brighton & Hove	S/RA	Edburton Contractors	526400	104700	
North Quay Road, Newhaven	S/RA	Wealden Group	544800	101600	Site only operational for half of 2018, now closed
Sandbanks, Herstmonceux	S/RA	Robins of Herstmonceux	563800	113800	
New Road Industrial Estate, Newhaven	S/RA	Greenacre Waste Recycling	544656	102407	No S/RA produced in 2018
Unit 13, Chaucer Industrial Estate, Polegate	S/RA	Pauls Mini Skips	559827	104692	No S/RA produced in 2018
Unit 3, Cradle Hill Industrial Estate, Seaford	S/RA	James Waste Management /Expert Skip Hire	549670	100317	No S/RA produced in 2018
Greystone Quarry, Southerham Lane, Lewis	S/RA	MDJ Light Bros Ltd	543200	109100	Within the SDNP

Hampshire (Including Portsmouth, Southampton, NFNP and SDNP)					
Site	Facility Type	Operator	Eastings	Northings	Comments
Badminton Farm	SSG Quarry	Mid Hants Ltd	447600	102100	Partly within the NFNP
Bleak Hill (Hamer Warren), Somerley	SS / SSG Quarry	CEMEX Materials Ltd - South East	413100	110800	
Bramshill (Warren Heath) Quarry, Eversley	SSG Quarry	CEMEX Materials Ltd - South East	478300	159400	
Blashford Quarry (Pumley Wood)	SS / SSG Quarry	Tarmac Ltd	414600	107300	
Forest Lodge Home Farm	SS Quarry	TJ Transport			
Frithend Sand Quarry	SS Quarry	Grundon Waste Management Ltd	481300	139000	
Marchwood (Bury Farm) Quarry	SSG Quarry	Marchwood Aggregates	437700	111000	
Mortimer Quarry	SSG Quarry	Hills Group	46272	16417	
Kingsley Quarry (Rookery Farm)	SS Quarry	Tarmac Ltd	478000	137800	
Roke Manor Quarry	SSG Quarry	Raymond Brown	433200	122600	
Downton Manor Farm	SSG Quarry	New Milton Sand & Ballast	427400	93100	
<i>Eversley (Chandlers Farm) quarry, Eversley</i>	<i>SSG Quarry</i>	<i>CEMEX Materials Ltd - South East</i>	<i>480100</i>	<i>161900</i>	
Bedhampton Wharf, Havant	Wharf	Tarmac Ltd	470500	105600	
Burnley Wharf, Southampton	Wharf	Tarmac Ltd	443000	111700	
<i>Dibles Wharf, Southampton</i>	Wharf	<i>Dudman Group</i>	<i>443200</i>	<i>111200</i>	
Kendall's Wharf, Portsmouth	Wharf	Kendall Bros	467500	103200	
Fareham Wharf, Fareham	Wharf	Tarmac Ltd	458000	105900	
Marchwood Wharf, Marchwood	Wharf	Tarmac Ltd	439900	111200	
Leamouth Wharf, Southampton	Wharf	CEMEX Materials Ltd - South East	443300	112300	
Botley Rail Depot, Botley	Rail Depot	Aggregate Industries	452100	113300	
Eastleigh Rail Depot, Eastleigh	Rail Depot	Aggregate Industries	446100	118300	
Fareham Rail Depot, Fareham	Rail Depot	Kendall Bros	457000	106300	
A303 Enviropark, Barton Stacey	S/RA	Raymond Brown	444300	143000	
Ashley Crescent, Southampton	S/RA	L & S Waste Management	446100	110400	
Beacon Hill, Ewshot	S/RA	Cranston Bros	481900	150100	
Blashford Quarry, Ellingham	S/RA	Lafarge Tarmac Ltd	414600	107500	
<i>Bleak Hill, Harbridge</i>	<i>S/RA</i>	<i>Cemex Materials Ltd - South East</i>	<i>413100</i>	<i>111000</i>	

Botley Rail Depot, Botley	S/RA	Aggregate Industries	452000	113300	
Bury Farm, Marchwood	S/RA	Marchwood Aggregates	437700	111200	
Butser Hill Lime Works,	S/RA	George Ewan	474300,	125900	Within SDNP
<i>Bury Farm, Curbridge</i>	S/RA	<i>Wessex Demolition & Savage</i>	<i>452500</i>	<i>111200</i>	
Bunny Lane, Timsbury	S/RA	Waltet Materials & RFSF	435500	125100	
Caird Avenue, New Milton	S/RA	New Milton Sand & Ballast	425300	94600	
Calf Lane, Odiham	S/RA	Comley & Sons Ltd	477300	149800	
Dock Gate 20, Southampton Docks	S/RA	K&B Crushers	438600	112500	
Down Barn Farm, Fareham	S/RA	Graham Moyse	459100	107300	
Eastleigh Rail Depot, Eastleigh	S/RA	Aggregate Industries	446100	118300	
Eastleigh Rail Sidings, Eastleigh	S/RA	Network Rail	445800	118600	
Eversley Haulage Park, Eversley	S/RA	R Collard Ltd	478800	159100	
Farlington Redoubt, Portsmouth/Havant	S/RA	L & S Waste Management	468700	106400	
Four Dell Farm, Otterbourne	S/RA	HWM Group	445400	124400	
Gold Farm, Aldershot	S/RA	R Collard Ltd	488300	151800	
Harts Farm Way, Havant	S/RA	Conroy's Group	470500	105700	
Herberdens Farm, Finchdean (SDNP)	S/RA	A Fisk	473900	114000	
Hollybush Lane, Aldershot	S/RA	Chambers Ltd	488500	152400	
Hollybush Lane, Aldershot	S/RA	Taurus	488400	152300	
Lee Lane, Nursling	S/RA	Raymond Brown	436100	116800	
Lode Farm, Kingsley	S/RA	Lafarge Tarmac Ltd	477600	137500	
Manor Farm, Pennington	S/RA	New Milton Sand & Ballast	427400	93500	
Manor Farm, Tadley	S/RA	GB Foot/Basingstoke Skip Hire	460800	155600	
Mortimer Lane, Fairoak	S/RA	R&R Contractors and CWM	450300	118700	
Pegham Ind Est, Fareham	S/RA	L & S Waste Management	454900	108800	
Rookery Farm, Swanwick	S/RA	Raymond Brown	451200	109200	
Thruxton Airfield, Thruxton	S/RA	Earthline Ltd	428000	145500	
Wallington Depot, Fareham	S/RA	SITA	459100	106900	
Wade Road Depot Basingstoke	S/RA	Basingstoke Skip Hire	465100	153500	
Warren Heath, Bramshill	S/RA	R Collard Ltd	478347	159365	

Waterbrook Road, Alton	S/RA	Hutchings & Carter Ltd	473000	139800	
Yokesford Hill, Romsey	S/RA	Ace Liftaway	435800	123900	
Isle of Wight					
Site	Facility	Operator	Eastings	Northings	Comments
Cheverton Down, Shorwell	SSG Quarry	Cheverton Aggregates Ltd	444000	84000	
Hale Manor Farm	SSG Quarry	Wight Building Materials Ltd	454155	84433	
Knighton Sand Pit	SS / SSG Quarry	Knighton Sandpit Ltd	457400	86500	
St Georges Lane, Newport	SSG Quarry	Wight Building Materials Ltd	451000	87600	
Shorewell sandpit (Haslett Farm) Shorwell	SS / SSG Quarry	BR & GA Draper	446100	82200	
Prospect quarry	CR Quarry	Wight Building Materials Ltd	438338	86681	
Blackhouse Quay, Newport	Wharf	Blackhouse Quay Aggregates	450051	89866	
Kingston Wharf, East Cowes	Wharf	Isle of Wight Aggregates Ltd	450296	94331	
Medina Wharf, West Cowes	Wharf	Isle of Wight Aggregates Ltd	449900	94600	
Blackhouse Quay, Newport	S/RA	Blackhouse Quay Aggregates	450051	89866	
Duxmore Quarry	S/RA	Reynolds & Read Ltd	455106	87477	
Knighton Sand Pit	S/RA	Knighton Sand Ltd	457400	86500	
Kent					
Site	Facility	Operator	Eastings	Northings	Comments
Borough Green Sand Pit, Borough Green	SS / SSG Quarry	Borough Green Sandpits Ltd	561700	157600	
Greatness Farm (Sevenoaks Quarry), S'oak	SS Quarry	Tarmac Ltd	554046	157457	Major site
Allens Bank, Lydd	SSG Quarry	Brett Aggregates Ltd	604458	121779	
Aylesford Quarry, Aylesford	SS / SSG Quarry	Aylesford Heritage Ltd	572554	159635	Change of ownership
Charing Quarry, nr Ashford	SS Quarry	Brett Aggregates Ltd	593562	149294	Major site
Conningbrook Quarry, Ashford	SS / SSG Quarry	Brett Aggregates Ltd	603215	143732	
Darenth Court Quarry, Dartford	SS / SSG Quarry	J Clubb Ltd	555077	172398	
Denge Quarry, Dungeness	SS / SSG Quarry	CEMEX UK	608439	119764	Major site
East Peckham Quarry, E Peckham	SS / SSG Quarry	J Clubb Ltd	567868	148815	
Faversham Quarries	SS / SSG Quarry	Brett Aggregates Ltd	601573	162621	
Ham Hill Sand Pit (Snodland Quarry)	SS Quarry	Tarmac Ltd	569300	161000	

Ightham Sand Pit	SS Quarry	H & H Celcon Ltd	560194	157870	
Joyce Green Quarry	SS / SSG Quarry	Ingrebourn Valley Ltd	553990	175999	Change of ownership - major
Lenham Quarry (Shepherds Farm), Lenham	SS Quarry	Brett Aggregates Ltd	591665	150372	Major site
Lydd Quarry (Scotney Court Farm), Lydd	SS / SSG Quarry	Brett Aggregates Ltd	602063	120108	
Nepicar Sand Quarry, nr Sevenoaks	SS Quarry	J Clubb Ltd	562497	157907	
Stone Castle Farm, nr Tonbridge	SS / SSG Quarry	Lafarge Aggregates Ltd	564873	146839	
Wrotham quarry (Addington Sand Pit), Wrotham	SS / SSG Quarry	Ferns Aggregates	564700	159400	Change of ownership- major
Blaise Farm, West Malling	CR Quarry	Hanson Aggregates	566000	156000	Major site
Hermitage Quarry, Maidstone	CR Quarry	Gallagher Aggregates	572200	156000	Major site
Denton Wharf (Clubb Marine) Gravesend	Wharf	J Clubb Ltd	566908	174170	Major site
<i>Dunkirk Jetty, Dover Wharf</i>	<i>Wharf</i>	<i>CEMEX UK</i>	<i>632000</i>	<i>140400</i>	<i>Decommissioned</i>
East Quay, Whitstable Wharf	Wharf	Brett Aggregates Ltd	610858	167089	
Johnson's Wharf, Greenhithe	Wharf	Tarmac Ltd	558187	175135	Major site
Northfleet Wharf (Botany Marshes), N'fleet	Wharf	CEMEX UK	561069	175986	Major site
Ramsgate New Port, Ramsgate	Wharf	Brett Aggregates Ltd	637971	163929	
Red Lion Wharf, Gravesend	Wharf	Stema Shipping (UK) Ltd	563149	174514	Major site
Ridham Dock, Ridham	Wharf	Brett Aggregates Ltd	592102	168318	
Ridham Dock, Sittingbourne	Wharf	Tarmac Ltd	591910	168695	
Robins Wharf (Grove Road), Northfleet	Wharf	Brett Aggregates Ltd	561668	175045	Major site
Robins Wharf, Northfleet	Wharf	Aggregate Industries	561707	175040	Major site
Allington Rail Sidings, Allington	Rail Depot	Allington Rail Sidings, Allington	574441	157979	Major site
<i>Conningbrook Depot</i>	<i>Rail Depot</i>	<i>Conningbrook Depot</i>	<i>602900</i>	<i>143900</i>	
<i>East Peckham Rail Depot</i>	<i>Rail Depot</i>	<i>East Peckham Rail Depot</i>	<i>568026</i>	<i>148928</i>	<i>No Sales in 2018</i>
Hothfield Works, Westwell	Rail Depot	Hothfield Works, Westwell	598057	146316	Major site
Allington Depot	S/RA	Hanson Aggregates	574459	157922	
Borough Green Sand Pit, Sevenoaks	S/RA	Borough Green Sandpits Ltd	561513	157704	

Clubbs Marine Wharf, Gravesend (Denton)	S/RA	J Clubb & Sons Ltd	566892	174179	
Conningbrook Quarry	S/RA	Brett Aggregates Ltd	603061	143865	Major site
East Peckham Rail Depot	S/RA	J Clubb & Sons Ltd	568001	148937	
Faversham Quarries	S/RA	Brett Aggregates Ltd	601263	162503	
FM Conway Works, Dartford	S/RA	FM Conway	551230	173712	Major site
<i>Greatness Integrated Waste Management Facility</i>	<i>S/RA</i>	<i>Cory Environmental</i>	<i>553600</i>	<i>157700</i>	
Hermitage Quarry, Maidstone	S/RA	Gallagher Aggregates Ltd	572200	156000	
Hothfield Works, Ashford	S/RA	Tarmac Ltd	598056	146329	
Manor Way, Swanscombe	S/RA	Lancebox	560590	174913	
Milton Pipes Site Recycling Plant	S/RA	Sheerness Recycling Ltd	591000	164600	
Pinden Quarry	S/RA	Pinden Plant & Processing	559583	169611	Major site
Ramsgate New Port, Ramsgate	S/RA	Brett Aggregates Ltd	637949	163975	
Richborough Hall, Sandwich	S/RA	Thanet Waste Services	633328	160965	
Ridham Dock, Sittingbourne	S/RA	Ballast Pheonix	592043	168216	Major site
Ridham Wharf	S/RA	Brett Aggregates Ltd	591972	168508	
<i>Sevington Rail Depot</i>	<i>S/RA</i>	<i>Brett Aggregates Ltd</i>	<i>603615</i>	<i>140232</i>	
Shelford Landfill, Canterbury	S/RA	Vindor Waste Management	616190	160160	
Snodland (Ham Hill Quarry)	S/RA	Tarmac Ltd	569300	161000	Major site
<i>Stonelees Golf Course</i>	<i>S/RA</i>	<i>Ovenden Earthmoving Co Ltd</i>	<i>633705</i>	<i>162783</i>	
Swanscombe Site Recycling Plant	S/RA	Sheerness Recycling Ltd	560400	175000	
Tilmanstone Works	S/RA	RH Ovenden Ltd	629025	150732	
Medway					
Site	Facility Type	Operator	Eastings	Northings	Comments
Isle of Grain Quarry, Perrys Farm, Grain	SSG Quarry	J Clubb Ltd	588533	177209	
Stoke Road, Hoo St. Werburgh	SSG Quarry	Tarmac	579500	172500	
Cliffe Terminal	Wharf	Brett Aggregates Ltd	570756	176785	
Eurowharf, Frindsbury, Rochester	Wharf	Hanson Aggregates	575400	169500	
Isle of Grain, Grain	Wharf	Aggregate Industries	587238	173994	
Isle of Grain, Grain	Rail Depot	Aggregate Industries	587287	174513	

Isle of Grain Ballast Site	S/RA	Aggregate Industries	587563	174268	
Unit 1, Templemarsh Estate	S/RA	Site Remediation Limited	573100	168100	
Milton Keynes					
Site	Facility Type	Operator	Eastings	Northings	Comments
<i>Land at Passenham Quarry (eastern extension) Calverton</i>	<i>SSG Quarry</i>	<i>GRS Roadstone Ltd</i>	<i>478061</i>	<i>239003</i>	<i>Permission Unimplemented</i>
Land South of Caldecote Farm, Newport Pagnell	SSG Quarry	Smith Construction	488046	242152	
Land East of Haversham Road, New Bradwell	SSG Quarry	Hanson Quarry Products Ltd	482114	242002	
<i>Land to north & east of Lathbury.</i>	<i>SSG Quarry</i>	<i>Smith Aggregates Ltd</i>	<i>874770</i>	<i>457960</i>	<i>Permission Unimplemented</i>
Bletchley Rail Depot	Rail Depot	CEMEX	486880	233670	
<i>Cotton Valley Waste Transfer Station, Pineham</i>	<i>S/RA</i>	<i>Mick George Ltd</i>	<i>488374</i>	<i>240673</i>	
Oxfordshire					
Site	Facility Type	Operator	Eastings	Northings	Comments
<i>Cassington Quarry</i>	<i>SSG Quarry</i>	<i>Hanson UK</i>	<i>447500</i>	<i>211000</i>	
Caversham Quarry	SSG Quarry	Tarmac	475000	176400	
Chinham Farm / Bowling Green Farm Quarry	SS Quarry / CR Quarry	Hills Quarry Products Ltd	431300	194800	
Duns Tew Quarry	SS Quarry / CR Quarry	Smith & Sons (Bletchington) Ltd	445500	227600	
Faringdon Quarry	SSG Quarry / SS Quarry / CR Quarry	Grundon Sand & Gravel Ltd	428600	193800	
<i>Finmere Quarry</i>	<i>SSG Quarry</i>	<i>Opes Industries</i>	<i>462800</i>	<i>232600</i>	
Gill Mill Quarry, Ducklington	SSG Quarry	Smith & Sons (Bletchington) Ltd	436900	207400	
Hatford Quarry, Hatford	SS Quarry / CR Quarry	Hatford Quarry Ltd	433400	195400	
<i>Moorend Lane Farm, Thame</i>	<i>SSG Quarry</i>	<i>David Einig Contracting Ltd</i>	<i>471300</i>	<i>206700</i>	<i>Extraction not yet commenced</i>

<i>New Barn Farm, Cholsey</i>	<i>SSG Quarry</i>	<i>Grundon</i>			<i>Not Yet Commenced</i>
Shellingford Quarry	SS Quarry / CR Quarry	Multi Agg Ltd	432700	193700	
<i>Stanton Harcourt Quarry (Stonehenge Farm)</i>	<i>SSG Quarry</i>	<i>Hanson UK</i>	<i>440800</i>	<i>202200</i>	<i>Extension not yet commenced</i>
Sutton Courtenay Quarry (Bridge Farm)	SSG Quarry	Hanson UK	451700	194300	
Sutton Wick Quarry, Abingdon	SSG Quarry	H Tuckwell & Sons Ltd	449100	195100	
<i>Thrupp Farm Quarry, Radley</i>	<i>SSG Quarry</i>	<i>J Curtis & Sons</i>	<i>452300</i>	<i>197800</i>	<i>Dormant ROMP site</i>
Upwood Quarry, Besseleigh	SS Quarry / CR Quarry	Hills Quarry Products Ltd	445300	200300	
<i>Alkerton Quarry</i>	<i>CR Quarry</i>	<i>Peter Bennie Ltd</i>	<i>438700</i>	<i>243100</i>	<i>Closed in 2017</i>
Burford Quarry	CR Quarry	Smith & Sons (Bletchington) Ltd	427700	209900	
Dewars Farm Quarry, Ardley	CR Quarry	Smith & Sons (Bletchington) Ltd	454000	225000	
<i>Rollright Quarry Phase 1</i>	<i>CR Quarry</i>	<i>Hanson UK</i>	<i>428400</i>	<i>230600</i>	
Rollright Quarry Phase 2	CR Quarry	Smith & Sons (Bletchington) Ltd	428400	230600	
Sarsden (Castle Barn) Quarry	CR Quarry	Great Tew Farm Partnership	430100	222600	
Shipton on Cherwell Quarry	CR Quarry	Earthline Ltd	447600	217500	
<i>Whitehill Quarry</i>	<i>CR Quarry</i>	<i>Smith & Sons (Bletchington) Ltd</i>	<i>427000</i>	<i>210800</i>	
Wroxton Quarry	CR Quarry	Peter Bennie Ltd	440500	241500	
Appleford Sidings, Sutton Courtenay	Rail Depot	Hanson UK	452000	193100	
Hennef Way, Banbury	Rail Depot	Tarmac	446100	241900	
Hinksey Sidings, Oxford	Rail Depot	Network Rail	451300	204500	Only used by rail industry
Oxford Road, Kidlington	Rail Depot	Hanson UK	450500	212500	
<i>Shipton on Cherwell Quarry</i>	<i>Rail Depot</i>	<i>Earthline Ltd</i>	<i>448100</i>	<i>217500</i>	<i>Permitted, not yet developed</i>
Ardley ERF	S/RA	Fortis IBA	454300	225900	
<i>Burford Quarry</i>	<i>S/RA</i>	<i>Pavestone UK</i>	<i>427760</i>	<i>209519</i>	<i>Permitted not yet developed</i>
Cemex Site, Hardwick	S/RA	Fergal Contracting	438700	205700	
Dix Pit, Stanton, Harcourt	S/RA	Sheehan Haulage & Plant Hire Ltd	440300	205000	
Enstone Airfield	S/RA	David Einig Contracting Ltd	439030	225667	

Ewelme Landfill No 2	S/RA	Grundon Waste Management	464600	190500	
Ferris Hill Farm, Hook Norton	S/RA	Banbury Skips	435500	235100	
Gill Mill Quarry, Ducklington	S/RA	Smith & Sons (Bletchington) Ltd	437000	207800	
Grove Industrial Park, Wantage	S/RA	Aasvogel Recycling & Skip Hire	438500	189500	
Hundridge Farm, Ipsden	S/RA	G D Parker	466900	185400	
Lakeside Industrial Park Standlake	S/RA	Micks Skips & Recycling Ltd	438400	204400	
Newlands Farm, Milton Road, Bloxham	S/RA	Smiths of Bloxham	443900	135200	
New Wintles Farm, Eynsham	S/RA	David Einig Contracting Ltd	443100	210800	
Playhatch Quarry, Sonning Eye	S/RA	Grabloader Ltd	474000	176500	
Prospect Farm, Chilton	S/RA	Raymond Brown Minerals & Recycling Ltd	449800	185100	
Rumbold's Pit, Ewelme	S/RA	Hazell & Jeffries	464500	192700	
Sandfields Farm, Chipping Norton	S/RA	KJ Millard Plant Hire & Sales Ltd	432200	229300	
Shellingford Quarry	S/RA	Multi Agg Ltd	432800	193700	
Shipton Hill, Fulbrook	S/RA	Hickman Bros.	426700	213800	
Shipton on Cherwell Quarry	S/RA	Earthline Ltd	447800	217400	
Sutton Courtenay Quarry	S/RA	Hanson UK	451500	193000	
Sutton Courtenay Asphalt Plant	S/RA	Hanson UK	451459	193503	
Upwood Quarry, Besseleigh	S/RA	Hills Quarry Products Ltd	445200	200300	Permitted not yet developed
Cresswell Field, Cassington	S/RA	David Einig Contracting Ltd	447100	211300	Not operational
Drayton Depot	S/RA	Oxfordshire Highways	448900	193500	
Stonepitt Barn	S/RA	S.Belcher			Not yet commenced

Surrey

Site	Facility Type	Operator	Eastings	Northings	Comments
Addlestone Quarry (Wey Manor Farm)	SSG Quarry	Cappagh Public Works Ltd	506060	163294	Within GB
Farnham Quarry (Runfold Farm)	SSG Quarry	Hanson Aggregates	487500	148400	
Alton Road Sandpit	SS Quarry	Earthline Ltd	482000	144900	Not in AONB or GB
Hengrove Farm, Staines	SSG Quarry	Henry Streeter Ltd	505200	172100	
Hithermoor quarry (Stanwell Quarry)	SSG Quarry	Brett Group	503400	174700	GB

<i>Homefield Sandpit, Farnham</i>	<i>SS Quarry</i>	<i>Chambers Runfold plc</i>	<i>487600</i>	<i>147600</i>	<i>GB and AONB (Surrey Hills)</i>
Homers Farm	SSG Quarry	Henry Streeter (Sand and Ballast Ltd)	507082	173209	Site now active Not in GB or AONB
Land north east of Pendell Farm	SS Quarry	Sibelco UK	532398	152333	GB and AONB (Surrey Hills)
<i>Manor Farm</i>	<i>SSG Quarry</i>	<i>Brett Group</i>	<i>505420</i>	<i>169924</i>	<i>Not yet commenced GB</i>
Mercers South Quarry	SS Quarry	J&J Franks Ltd	530737	151586	Site now active GB
Moorhouse Sand Pit, Limpsfield	SS Quarry	Titsey Estates	541900	153400	GB and AONB (Surrey Hills)
North Park Quarry, Godstone	SS Quarry	Sibelco UK	534100	151700	GB and AONB (Surrey Hills)
Queen Mary Reservoir, Laleham	SSG Quarry	Brett Group	507200	169600	GB
Reigate Road Quarry	SS Quarry	J & J Franks Ltd	520600	150500	GB
Runfold South Quarry (Area C), Farnham	SS Quarry	SITA	486300	147000	Site now closed Not in GB or AONB
<i>Shepperton Quarry, Shepperton</i>	<i>SSG Quarry</i>	<i>Brett Group</i>	<i>505800</i>	<i>167400</i>	Site now closed GB
<i>Tapwood Quarry, Buckland</i>	<i>SSG Quarry</i>	<i>Hanson Quarry Products Europe Ltd</i>	<i>523000</i>	<i>151000</i>	Site now closed
British Rail Down Yard, Woking	Rail Depot	Day Aggregates	500100	158200	Not in GB or AONB
Salfords Rail Aggregate Depot	Rail Depot	Day Aggregates	528500	145900	Not in GB or AONB
2 Perrylands Lane, Smallfield	S/RA	Fuller Grab Hire	530800	142700	Site now active GB
20-24 Westfield Road, Guildford	S/RA	Chambers Waste Management Ltd	500300	152300	Not in GB or AONB
Capital House, Woodham	S/RA	Capital Demolition Ltd	503400	162700	GB
Hithermoor Quarry, Stanwell Moor	S/RA	Brett Group	503500	174900	Not GB or AONB
Homefield Sandpit, Runfold	S/RA	Chambers Runfold plc	487500	147400	GB and AONB (Surrey Hills)
Kill Copse Farm, Shamley Green	S/RA	Guildford Tipper Hire Ltd	504300	142000	GB and AONB (Surrey Hills)
Land West of Queen Mary Reservoir, Ashford	S/RA	Brett Group	506300	170400	GB
Little Orchard Farm, Hookwood	S/RA	Britania Crest Recycling Ltd	525900	144500	GB
Normans Corner, Smallfield	S/RA	R&S Etherington	532000	144100	GB
<i>Oakleaf Farm, Stanwell Moor</i>	<i>S/RA</i>	<i>Charles Morris (Fertilizer) Ltd</i>	<i>504400</i>	<i>174300</i>	Site now closed GB
Plough Industrial Estate, Leatherhead	S/RA	D&E Roberts	516300	157300	Not GB or AONB
Reigate Road Materials Recovery Facility, Betchworth	S/RA	J&J Franks Ltd	520300	150400	GB
Runfold South Quarry, Runfold	S/RA	R Collard Ltd	486300	147200	Site now closed

					Not in GB or AONB
Shepperton Quarry, Shepperton	S/RA	Killoughery Ltd	505900	167500	GB
Stanwell Quarry	S/RA	Cappagh Public Works Ltd	505200	174600	GB
<i>Sunnyside Worplesdon</i>	<i>S/RA</i>	<i>John Gunner & Co Ltd</i>	<i>495100</i>	<i>152600</i>	<i>Site inactive GB</i>
Weylands Treatment Works, Hersham	S/RA	General Demolition Ltd	512500	165600	GB
West Sussex (Including SDNP)					
Site	Facility Type	Operator	Eastings	Northings	Comments
<i>Chantry Lane Quarry, Sullington</i>	<i>SSG Quarry</i>	<i>Dudman Group Ltd</i>	<i>509457</i>	<i>113880</i>	
Hampers Lane Sandpit, Sullington	SS Quarry	Britannia Crest Recycling Ltd.	510675	113821	
Kingsham	SSG Quarry	Dudman Group Ltd	486315	103375	Commenced preparation work in 2016. Expect to start production in 2017/18
Rock Common Sandpit, Washington	SS Quarry	Dudman Group Ltd.	512561	113456	
Sandgate Park Quarry, Sullington	SS Quarry	CEMEX UK Ltd	510254	114007	
West Heath Quarry, West Harting	SS Quarry	CEMEX/RMC Agg. (Southern) Ltd	478400	122800	Within SDNP
<i>Minsted Sandpit, Minstead</i>	<i>SS Quarry</i>	<i>Dudman Aggregates Ltd</i>	<i>485500</i>	<i>121500</i>	Within SDNP
Heath End Quarry, Duncton	SS Quarry	Dudman Group of Companies	496300	118800	Within SDNP
<i>Coates and pit, Coates, nr Fittleworth</i>	<i>SS Quarry</i>	<i>Birlington estate</i>	<i>499800</i>	<i>117600</i>	Within SDNP
Halls Aggregate Wharf, Shoreham	Wharf	CEMEX UK Ltd.	525682	104934	
Turberville and Penneys Wharf, Southwick	Wharf	Dudman Group Ltd	523986	104969	
New Wharf, Shoreham	Wharf	Kendall Bros (Portsmouth) Ltd	522419	105052	
Solent /ARC Wharf, Portslade	Wharf	Tarmac and Hanson	525393	104809	
<i>LDF Wharf, Shoreham</i>	<i>Wharf</i>	<i>Shoreham Port Authority</i>	<i>525688</i>	<i>104816</i>	
Railway Wharf, Littlehampton	Wharf	Tarmac Ltd	502002	102345	
<i>Kingston Wharf, Shoreham</i>	<i>Wharf</i>	<i>Day Aggregates Ltd.</i>	<i>523021</i>	<i>105017</i>	
<i>Rombus Wharf</i>	<i>Wharf</i>	<i>N/A</i>	<i>525554</i>	<i>104806</i>	
<i>Tinsley Goods Yard, Crawley</i>	<i>Rail Depot</i>	<i>CEMEX UK Ltd.</i>	<i>528708</i>	<i>139021</i>	<i>Mothballed in 2014</i>
Railway sidings, Chichester	Rail depot	Dudman Group Ltd	485094	104523	
Crawley Rail Depot	Rail depot	Day Aggregates	528668	138930	

Crawley Goods Yard, Crawley	Rail depot	Aggregates Industries	528592	138760	
Ardingly Rail Depot, Ardingly	Rail depot	Hanson Aggregates	533901	127609	
<i>Bognor Road Distribution Centre</i>	<i>S/RA</i>	<i>N/A</i>	<i>487800</i>	<i>104100</i>	Not yet implemented PP
Burleigh Oaks Farm, Turners Hill	S/RA	Cox Skips	534690	136517	
Crawley Goods Yard, Crawley	S/RA	Day Aggregates Ltd.	528668	138930	
Eastlands Farm	S/RA	Mr D Nichols	536151	123119	
Elbridge, Chichester Road, Bersted	S/RA	GR Ayling	491409	102122	
EWS Good Yard, Crawley	S/RA	Aggregate Industries	528592	138760	
(Former) Hurstpierpoint WWTW	S/RA	Edburton Contractors	527811	118184	
Ford Waste Management Facility, Ford	S/RA	South Coast Skips	499957	102557	
<i>Former Brickworks, Langhurstwood</i>	<i>S/RA</i>	<i>Britania Crest Recycling Ltd.</i>	<i>517400</i>	<i>134800</i>	
<i>Grinders Lane</i>	<i>S/RA</i>	<i>Penfold Verrall</i>	<i>515416</i>	<i>118591</i>	
Sussex Waste Recycling (Rabbit Skips)	S/RA	Rabbit Skips	517445	103881	
Rowley Farm, Lowfield Heath, Crawley	S/RA	Cook and Son LTd.	527944	139633	
Wyevale Garden Centre, Copthorne Road	S/RA	TJS Services/AMV haulage	530311	138296	
Shoreham Cement Works, Upper Beeding	S/RA	Dudman Group Ltd	520100	108900	Within SDNP
Herberdens Farm, Finchdean	S/RA	A Fisk	473900	114000	Within SDNP
Newtimber Chalk Works, Pyecombe	S/RA	Robins of Herstmonceux	527700	113700	Within SDNP
<i>Slindon Bottom Gravel Pit</i>	<i>S/RA</i>	<i>Taylor Plant & Haulage Ltd</i>	<i>495000</i>	<i>107910</i>	Within SDNP
Hobbs Barn, Climping	S/RA	Arun Waste Services	499315	101385	
West Berkshire					
Site	Facility Type	Operator	Eastings	Northings	Comments
<i>Cravens Keep, Hempstead Marshall</i>	<i>SSG Quarry</i>	<i>Earthline</i>	<i>441700</i>	<i>166500</i>	<i>Small reserve remaining, to be extracted over 2 years by 2042</i>
Copyhold Farm, Curridge	SS Quarry	Raymond Brown	449000	172800	In North Wessex Downs AONB.

					Site worked out in 2019.
Harts Hill Copse, Upper Bucklebury	SSG Quarry	Harleyford Aggregates Ltd	453100	168700	Site recommenced production in 2018.
Kennetholme Farm, Midgham	SSG Quarry	S Grundon Ltd	455200	166100	Extension to time (2 years) granted in 2019.
<i>Lower Farm, Wasing</i>	SSG Quarry	<i>Tarmac Ltd</i>	<i>457976</i>	<i>165045</i>	<i>Permitted, not yet developed</i>
<i>Moores Farm, Pingewood</i>	SSG Quarry	<i>Caversham Restoration</i>	<i>469600</i>	<i>169700</i>	Extension to time (2023) granted in 2019.
Theale (South)	Rail Depot	Aggregate Industries & United Asphalt	463500	170600	
Theale (North)	Rail Depot	Hanson Aggregates	463500	170400	
Theale (Central)	Rail Depot	Breedon	463500	170500	
Avon Site, Colthrop	S/RA	F M Conway Ltd.	453500	167000	
<i>Copyhold Farm Quarry, Priors Ct Road, Curridge</i>	<i>S/RA</i>	<i>Raymond Brown</i>	<i>449300</i>	<i>172900</i>	<i>North Wessex Downs AONB</i>
Moores Farm, Pingewood	S/RA	Caversham Restoration	469600	169700	Extension to time (2024) granted in 2019
Kennetholme Farm, Migham	S/RA	Grundon Sand and Gravel Limited	455200	166100	Extension to time (2 years) granted in 2019.
Theale Waste Recycling and Transfer Facility	S/RA	Hadleys	465800	169800	
Reading Quarry, Berry Lane, Pingewood	S/RA	J Mould	468600	169700	
Whitehouse Farm, Silchester Road, Tadley	S/RA	J Stacey	460800	162700	

Appendix G: Members of the SEEAWP

Organisation Type	Organisation
Mineral Planning Authorities	Bracknell Forest Borough Council
	Buckinghamshire County Council
	East Sussex County Council – also on behalf of Brighton and Hove City Council
	Hampshire County Council – also on behalf of Southampton City Council, Portsmouth City Council and the New Forest National Park Authority.
	Isle of Wight Council
	Kent County Council
	Medway Council
	Milton Keynes Council
	Oxfordshire County Council
	Reading Borough Council
	Royal Borough of Windsor & Maidenhead
	Slough Borough Council
	South Downs National Park Authority
	Surrey County Council
	West Berkshire Council
	West Sussex County Council
	Wokingham Borough Council
Minerals Industry Representation	Tarmac Southern Ltd
	Cemex
	Minerals Product Association (MPA)
	Hanson Aggregates
	Robert Brett & Sons Ltd
	Grundon
	British Aggregates Association (BAA)
	Summerleaze Ltd
	Raymond Brown
	Aggregate Industries
	Day Group
	The Crown Estate
	Marine Management Organisation
Government/NGOs	MHCLG
	The Crown Estate
	Marine Management Organisation
Neighbouring Aggregate Working Parties	East of England AWP
	London AWP

Appendices H: Minutes of SEEAWP meetings - 2018

Note: Refer to SEEAWP web site for full copies of Minutes with appendices

<https://www.hants.gov.uk/landplanningandenvironment/seeawp>

Minutes of the Meeting of SEEAWP held on 16 April 2018 at Hampshire County Council

Present

Tony Cook	(TC)	Chairman
Richard Read	(RR)	SEEAWP Technical Secretary
Thomas Uglow	(TU)	SEEAWP Secretariat
Melissa Spriggs	(MS)	Hampshire/Central and Eastern Berkshire
Rupy Sandhu	(RS)	West Sussex
Peter Day	(PD)	Oxfordshire
Chris Mills	(CM)	Isle of Wight
Andrew Morrow	(AM)	West Berkshire
Thoma Light	(TL)	Surrey
Mark Chant	(MC)	on behalf of Milton Keynes
Emily Brown	(EB)	Buckinghamshire
Kirsten Williamson	(KW)	South Downs National Park
Pat Randall	(PR)	East Sussex/Brighton and Hove
Sharon Thompson	(ST)	Kent
Bryan Geake	(BG)	Kent
David Payne	(DP)	Minerals Product Association
Richard Ford	(RF)	Brett
Shyam Pankhania	(SP)	Brett
Jo Baker	(JB)	Aggregate Industries
Phil Aust	(PA)	Day Group
Mike Lowe	(ML)	Summerleaze
Helen Hudson	(HH)	Cemex
Rob Anderson	(RA)	Crown Estate (Royal Haskoning DHV)

1. Welcome and Apologies

Tony Cook's Chairmanship ended in April 2018 RR nominated TC to at least continue in his role until the end of the AWP Contract. This was agreed by SEEAWP.

First time attendees were welcomed to SEEAWP and apologies were received from Laura Davidson (Milton Keynes), Paul Sanderson (Surrey), Sarah Iles (East Sussex), Ross Crayford (Medway), and Nick Everington (Crown Estate).

2. Minutes of the meeting on 6 November 2018

RR stated that the note on Recycled Aggregate attached to the Minutes provided by PR would be substituted by the 'clean' version - there are no material changes to the original. This had been circulated

TC added that despite the findings found in the Recycled Aggregate note, which had been minuted at the previous meeting that SEEAWP would pursue the 'survey' method with vigour.

DP stated that the MPA had been reviewing the data and found that the 30% contribution figure was fairly robust and a reasonable estimate although the review was based on an update of methodology and not new data.

Action 1. RR to circulate MPA report with draft Minutes

3. Revised National Planning Policy Framework (NPPF)

SEEAWP considered report 18/01 on the consultation on the revised NPPF and the questions posed on the revised Chapter 17.

Q38

RR said it was his understanding neither industry or the mpas would support placing minerals policy in a document separate from the main NPPF.

PD stated that the mpas wanted to see a strong response and this was corroborated by DP who said that industry agreed with the local authorities that the separation of minerals from the NPPF was a backwards step. It would encourage 'silo' thinking and separate mineral issues from mainstream decision making.

Q39

The merits of a revised set of National and Sub National Aggregate Guidelines (Q39) was discussed. DP emphasised the importance of communicating to MHCLG that the Guidelines are needed and SEEAWP should stress this.

PD said that the mpas were united in saying that they needed them, as they were critical to the working of the managed aggregate supply system (MASS). However, unless they were Government endorsed, their authority would be questioned. BG also stressed that without Guidelines there is a 'disconnect' in the system as there is no basis for assessing whether AWP's are making an appropriate contribution to supply.

TC noted that although Guidelines are welcomed by industry and mpas alike, it is uncertain how they would be prepared. After some discussion on options for addressing this TC reminded SEEAWP that the idea of an inter AWP's working party on preparing Guidelines was discussed at the NCG meeting in 2017. However, it is evident that the majority of the AWP's do not have the resources or time to substantially invest in Guidelines preparation, nevertheless SEEAWP could contribute to their revision through the NCG.

Q37

With regard to the revised wording of Chapter 17 (Q37) the following major points were agreed.

- The removal of the word "essential" from the beginning of Ch 17 was regrettable and the wording in para. 142 of the current NPPF should be reinstated.
- Reference to MCA's should be removed from the NPPF but included within the PPG. It was noted some mpas were not using them effectively.
- Building stone is not an aggregate so SEEAWP would make no comments.

- No comments be made on the wording about LAAs although it was noted they should be carried out rigorously and their standard raised. The importance of LAAs be stressed in a preface to SEEAWP's response to the consultation.
- The term 'maintenance' of landbanks and 'longer periods' should be reinstated in the NPPF, but comments from the MPA not included.
- SEEAWP would not comment on industrial minerals policy.

These points along with more detailed ones are set out in schedule form – based on that appended to 18/01 - as an appendix to the Minutes

DP added that the MPA were still going to comment on the other questions within the consultation relating to minerals, these included Q2, Q14, Q25, Q31, Q34, and Q36. It was concluded these were matters for individual mpas to address.

Response

There was agreement that SEEAWP's response should incorporate the conclusions of the discussion, including the revised appendix. However, there was a strong view that the response should be prefaced with a general statement that:

- Stressed the essential nature of minerals to delivering sustainable development.
- Outlined the elements of MASS – National and Sub National Guidelines, aggregate monitoring, preparation and scrutiny of LAAs and advice to Government and mpas – and how they worked together to deliver aggregates.
- Underlined how AWP administration funded by Government is critical to managing MASS.

The merits of a consultation response on behalf of all the English AWP's was discussed. It was acknowledged this would give more weight to the aggregate planning view but would have to be 'strategic' and similar to that to the preface to the SEEAWP's response. The Chairman and Secretary would explore this with the other AWP's.

Beach replenishment

BG raised the issue of high grade land won aggregate being used for beach replenishment in Kent. He queried whether it would not be more appropriate to use marine material as this is inefficient use of the landbank.

PA asked whether this was being done because it was a relatively small scale to justify the cost, RA added that this had been seen before as it is often a greater cost to mobilise the dredgers than import material from nearby quarry.

TC stated that the debate should be noted but the issue wasn't at a relevant scale for inclusion in the NPPF. BG agreed but felt that this did highlight weakness within the NPPF.

Action 2: TC/RR to send SEEAWP response based on the above points to DHCLG (deadline 9 May)

Action 3: TC/RR to explore a joint response with other AWP's

4. AM 2018 Progress

Members were reminded of the deadlines for sending Aggregate Monitoring (AM) survey returns.

The reporting of road planings' data was raised by RR who asked if the mpas could collect this as this information was required by the AWP contracts. TC and BG noted that the highways authorities would supply it if they possessed it. RR advised that EEAWP collected the data and reported it in their annual AM report.

JB informed the AWP that Aggregate Industries included the information in the recycling section of the AM survey returns, AM added that if it is reported by industry and highway authorities it would lead to double counting. PA added that there was a risk of also missing mobile sites.

RR stated that he would make reference to this in the AM Report.

MS suggested that there could be a separate survey on road planings and there was agreement from the AWP that this should be produced. A draft form will be prepared and the issue will be discussed at the next meeting in July.

Authorities were asked to advise the Secretariat of recycled aggregate site response rates to help assess the confidence of the data.

PD informed the AWP that many sites were giving nil returns on sales because they were not actually making sales but despatching it for further added value processing.

RR suggested that this subject was dealt with at the next meeting.

Action 4: RR to include road planings on agenda for July meeting

5. AWP Contracts

An email from DHCLG to the AWP Chairs stated that the AWP contract has been extended for another 12 months.

6. Marine Plans

TC stated that the public consultation on the South Marine Plans ended in January 2017 and that the plans were now in the pre adoption period.

RA informed the AWP that the South Marine Plans were yet to be adopted and that a note would be provided to attach to the Minutes.

Action 5: RA to advise RR although MMO has since confirmed that the Plans are scheduled for adoption this year.

7. London Plan Consultation

RR reported the SEEAWP letter, circulated with the agenda, to Greater London Authority on the London Plan consultation.

DP brought SEEAWP's attention to the 'agents for change' concept in the Plan, which required new development to be responsible for mitigating against amenity impacts from

existing development and infrastructure. This had implications for development proposals near aggregate wharves and depots.

EB added that SEWPAG had provided a response to the consultation.

8. Local Aggregates Assessments

The SEEAWP response to the West Sussex LAA had been circulated with the agenda.

Kent LAA

BG reported that there was no real change from what was reported at the previous meeting. The sand and gravel landbank is an issue although crushed rock reserves are satisfactory.

Kent needs just one of the site options identified in their mineral plan to continue to maintain a satisfactory soft sand *BG to confirm accuracy of this change* landbank. However, to maintain the sharp sand and gravel landbank Kent needs to keep all the site options.

The wharfs aren't running at full capacity but make a significant contribution.

TC asked for verification on what LAA rate actually was for Kent. BG explained that the variation in figures was in fact a typo and it should be the same as the 10 year average.

TC stated that there was no guidance to reader about the strength of the hard rock landbank.

PA pointed out that the original planning permission could be used to indicate reserves. EB asked if the 3 and 10 year average sales were confidential and PA advised that previous Minutes stated these could be published.

It was agreed that clarification of the LAA rate is needed but agreed with the findings. RR would send letter to Kent.

West Berkshire

AM informed the AWP that they were expecting the West Berkshire LAA in July.

Action 6: RR to respond to Kent's LAA

Action 7: West Berkshire to send LAA to RR by 25 June for July meeting

Action 8: All LAAs 2018 to be sent to RR by 15 October for November meeting

9. AOB

RA stated that the Crown Estate Annual Stats were published and that the south coast marine license tender process has now begun. Licenses should to be awarded by the end of next year.

CM reported the IoW Plan Review had been put back and would be published in the next few weeks.

DP alerted SEEAWP to the Living with Minerals conference on the 10th July and reminded all about the MPA/RTPI Mineral Planning Conference on the 24th May.

ST reported that as part of Kent's site plan for soft sands they will produce a soft sands statement about 'need'.

EB reminded the AWP that Bucks Reg 19 is now out and closes next week.

10. Future Meetings

16 July 2018 – Ashburton Hall, EII Court West, HCC, Winchester @14.00

19 November 2018 – Mitchell Room, EII Court West, HCC, Winchester @14.00

Actions

Action 1: RR to circulate MPA report with draft Minutes

Action 2: TC/RR to send SEEAWP response based on the above points to DHCLG (deadline 9 May)

Action 3: TC/RR to explore a joint response with other AWP's

Action 4: RR to include road planings on agenda for July meeting

Action 5: RA to advise RR although MMO have since confirmed that the Plans are scheduled for adoption this year

Action 6: RR to respond to Kent's LAA

Action 7: West Berkshire to send LAA to RR by 25 June for July meeting

Action 8: All LAAs 2018 to be sent to RR by 15 October for November meeting

Minutes of the Meeting of SEEAWP on 16 July 2018 at Hampshire County Council

Present

Tony Cook (TC)	Chairman
Richard Read (RR)	SEEAWP Technical Secretary
Thomas Uglow (TU)	SEEAWP Secretariat
Ross Crayford (RC)	Medway
Melissa Spriggs (MS)	Hampshire/Central and Eastern Berkshire
Paul Sanderson (PS)	Surrey
Thoma Light (TL)	Surrey
Peter Day (PD)	Oxfordshire
Pat Randall (PR)	East Sussex /Brighton & Hove
Andrew Morrow (AM)	West Berkshire
Bryan Geake (BG)	Kent
Emily Brown (EB)	Buckinghamshire
Kirsten Williamson	South Downs National Park Authority
David Payne (DP)	Mineral Products Association
Jo Baker (JB)	Aggregate Industries

1. Welcome, Introductions and Apologies

The Chair welcomed all to the meeting, Apologies were received from Mark Chant (Milton Keynes), Rupy Sandhu (West Sussex), Chris Mills (IoW), Richard Ford (Brett), Helen Hudson (Cemex), Phil Aust (Day Group), Sue Marsh (EEAWP), Nick Everington (Crown Estate).

2. Minutes of the previous meeting: 16 April 2018

The Minutes were accepted.

The deadline for the submission the Local Aggregates Assessments 2018 by the 15th October was noted. However, a request addressed to the Chairman from the Isle of Wight for a late submission of their LAA was agreed, although an update for the November SEEAWP meeting would be requested.

Action 1: The Secretary will respond on behalf of the Chairman to the Isle of Wight request - *Response letter attached*

3. Aggregates Monitoring 2017 Report

The Secretary introduced the main features of the South East AM 2017 namely:

- Although the report in its current form is a draft and some information is in need of correction, it is anticipated that the overall conclusions would not change.
- AM 2017 is not part of a national collation so there nothing to report on the overall import/export picture - Tables 1 & 2 - which are the same as recent AM reports.
- Overall aggregate sales – Table 3 – were during the last two years at their highest for a decade. Moreover, land won sand and gravel is now the largest sales component, supplanting the position wharves' sales held since 2012.
- Land won sand and gravel sales – Tables 4 & 5 - increased in 2017 to 10% above the 10-year average. Although the soft sand element, in proportion, has fallen back to the 2015 level.
- Sand and gravel reserves have increased to a 10.5 years (soft sand 17.5 years) landbank. Only Hampshire has a landbank below seven years. The prospects of

pending applications, which are equivalent to 2.5 years of reserves, indicate the current landbank could be maintained in the short term.

- There is little change in the crushed rock picture – Tables 6 & 7. It is the smallest aggregate sales component and there is a 20 years land bank.
- Sales of aggregate from the wharves – Table 8 & 9 - is a mixed picture. Sales in 2017 of sand and gravel are lower than recent years, although crushed rock sales are only down on 2016 sales. However, sales overall are higher than the 10-year average. There appear no marine aggregate reserve issues, although supply to market depends on the capacity at the wharves being maintained.
- Sales of crushed rock from the rail depots – Table 10 - are above 10-year average level. There are no reserves issue in Somerset the principal supplier, although rail depot capacity has to be maintained to ensure continuity of supply.
- Sales of recycled and secondary aggregate – Table 11 - is higher than the 10-year average but lower than recent sales. However, there is an incomplete data picture. It is noted that the average sales level over last decade – Table 3 - is about 15% of all aggregate sales. This compares with the MPA estimates of 30% although this would include sites not covered by the AM survey.
- The sales to capacity ratio of sand and gravel quarries is about 50% – Table 12. While the sales to capacity ratio for wharves and rail depots – Table 13 – is 65% and 71%, respectively. An improvement on last year but this may be due to better reporting.
- It is noted in Appendix A that three permissions were granted within environmental designations. There were also three permissions in Green Belts.
- Appendix B shows there is a full coverage of mineral plans in the South East although a number are over five years since adoption. There is a continuing programme of plan review.
- Demand for aggregates is likely to increase owing to the growth in; construction projects, housing and highway programmes. The Heathrow Expansion could have a significant impact.
- The overall picture – Table 14 – is that there is/are:
 - Adequate landbanks in terms of NPPF requirements.
 - Potential (pending planning applications and adopted mineral plan allocations) to augment the landbank.
 - Reserves and capacity to maintain/ increase marine and imported aggregate supply and recycled aggregate.
- Does this mean the South East is making an adequate and full contribution to aggregate supply?

PS noted that the Executive Summary did not refer specifically refer to soft sand. This was acknowledged by the Secretary who stated it would be addressed in the final version of the AM report.

The Chairman raised inconsistencies in Table 11 data that he believed were incorrect. The Secretary acknowledged that the recycled/secondary aggregate data required an audit.

The Secretary asked whether there are any views about double counting of sales at the wharves as some aggregate is moved from one wharf to another within SE region. JB agreed that this may an issue as this was observed in AM 2014 which only recorded sales if they were the final selling point. It was concluded that double counting is likely to be a marginal concern that would not change the overall picture.

The Chairman suggested that the word 'lower' was missing from bullet point 8.

PD volunteered to email comments on Oxfordshire data in Table 4.

MS mentioned that there was no mention of soft sand in the Conclusions and queried whether more 'contextual' information should be provided by the mineral planning authorities.

PR added that the mineral planning authorities could provide a local plan position statement that included issues being faced. The Secretary felt the AM could usefully include information on potential reserves in outstanding land won aggregate allocations. In the absence of any outstanding allocations, mineral planning authorities could provide advice on the commitments to maintaining landbanks.

BG stated that Kent were currently relying on an old plan, with respect to site allocations. AM added that West Berks were also relying on an old plan and that they will look at the sites that are likely to come forward.

The Secretary pointed out that with the suggested additional information the AM report would overlap information in the LAAs. However, PD replied that as the AM report precedes the publication of the LAA's some commentary would be helpful.

The Chairman asked if members were happy with the phrase "It is concluded that the South East is making a full contribution to meeting both national and local aggregate needs".

PD stated that the mineral planning authorities had concluded in their pre-meeting that the phrase was in need of clarification because of the absence of up to date national and regional aggregate guidelines. The Secretary noted that this point was taken on board in AM 2016 report. The Chairman added that there is a need to establish what 'full' is being measured against. The Secretary suggested that the LAA 'provision rates' need to be examined more thoroughly in their respective LAAs. There should be evidence that each mineral planning authority's rate is appropriate to the local circumstances and can address reasonable assumptions about growth.

It was agreed that the first sentence of paragraph 12.2 be amended to say that, in the absence of up to date National and Regional Guidelines, it is not known whether the South East of England is making a full contribution to meeting both national and local aggregate needs, but it is providing landbanks to a level compliant with Government policy (i.e. as measured against LAAs).

PS asked to what extent can marine aggregates provide soft sand? The Chairman responded that the Crown Estate had advised there is an off-shore resource. The Secretary added that South Wales gets all their soft sand from marine resources. It was also pointed out that soft sand had been dredged in the English Channel and landed in the South West. However, DP referred to comments made by the West Sussex Mineral Plan Inspector who concluded that marine soft sand could not be relied on as an alternative aggregate supply.

Action 2: The Secretary to circulate a revised AM 2018 in August for comment by w/e 6th October and, subject to these being resolved, the report will be signed off by the Chairman.

4. Kent Local Aggregates Assessment 2017

The Secretary stated that a revised version of the Kent LAA, which had taken into account comments from the last SEEAWP meeting, had been circulated. There had been no comments, so Kent had been advised accordingly – *letter circulated with agenda*.

5. West Berkshire Local Aggregates Assessment 2017

AM introduced the West Berkshire LAA:

- Primary aggregate sales are down but the sharp sand and gravel landbank looks healthy although the majority of it is in one site which is currently inactive.
- The soft sand landbank is essentially zero.
- 0.8 million tonnes of sharp sand and gravel and 1.1 million tonnes of soft sand is needed for plan period.
- Recycled and secondary aggregate sales have increased and capacity is currently good.
- Rail depot capacity for importing crushed rock is also good.
- The importance of allocated sites is noted and West Berks are commissioning further work on Soft Sand.

DP commented that the figures seemed unusual and queried how consumption was estimated, West Berks will either become more reliant on imports or will need to increase production. DP could not work out from the figures provided whether the conclusions were correct. However, he added that the LAA 'does the job', acknowledging West Berkshire is an unusual case.

The Chairman added that due to the small size of West Berkshire the preparation of an LAA is a challenge.

PD also added that the if recycled/secondary aggregate is to be relied on it is dependent on the feedstock available.

JB added that recycled/secondary aggregate could not substitute for the higher quality specifications. AM replied that historically it has been used as fill material.

The Chairman stated that West Berkshire would receive a letter from SEEAWP.

Action 3: The Secretary to write to West Berkshire that SEEAWP agreed with the conclusions of the LAA.

6. Road Planings

The Secretary explained that Hampshire County Council held the SEEAWP contract with the MHCLG, which required reporting on road planings.

After some discussion it was concluded that a survey of road planings would be included in the AM 2018 survey. It was acknowledged that the data would be held by disparate organisations including Highway Authorities, Highways England and the utility companies

The mineral planning authorities stated that they would endeavour to collect the data but it would depend on finding the right source.

JB explained that the material is difficult to track, as the material was moved, in some instances long distances (including by rail), and involved waste transfer notes and EA permits.

Action 4: The Secretary to include road planings in the next AM 2018 survey.

7. Future of Aggregate Working Parties (AWPs)

The Chairman introduced the subject noting the uncertainty over the continuation of the AWP.

DP reported that the MPA had a very positive meeting with Simon Gallagher, Head of Planning at MHCLG.

It was generally agreed that AM 2018 needed to include the national collation of AM surveys but the contract for this and the continuation of the AWP needed commitment from MHCLG.

It was noted that these matters would be discussed at the 18th October meeting of AWP Chairs and Secretaries in Birmingham

NB. The revised NPPF was published on 24th July which included references to the function of AWP. However, the response to the consultation on the revised NPPF states:

‘The Government notes the case that has been made for revitalising the MASS. Doing so raises important questions of resources, capability and how to do so in a modern, data-science led way. The Government intends to explore these issues after the publication of the Framework’

8. AoB

The Secretary stated that they are still waiting on the adoption of the South Marine Plans, while the preparation of the South East Marine Plan is progressing.

NB The South Marine Plan(s) were adopted on 17 July.

The Chairman asked about the launch of the Minerals Strategy at the Living with Minerals 6 conference. PR advised that the civil servant who attended on behalf of the Minister stated that the AWP system was going well, but made no commitments. DP stated that there was good attendance from a large diverse audience, the MPA had received advice to keep the Strategy simple, which was heeded. It was noted Ministers are not interested in minerals unless it concerned oil and gas.

BG asked about the dashboards on the LAAs and what the arrows should be in relation to 10 and 3-year average or year by year. It was clarified that the arrows should indicate how current sales performed in relation to these average sales measures.

AM advised that this would be his last meeting as he was leaving West Berks Council for a post in Eire.

The Secretary asked whether the Aggregate Monitoring report should be more reader friendly and include simplified tables/charts within the main text, with the current detailed table included in appendices. There was general support for this approach.

Action 5: The Secretary endeavour to prepare a revised model report based on AM 2017 to next meeting.

9. Next meeting

19th November - Mitchell Room, Ell Court West, Hampshire County Council, Winchester @ 14.00.

Minutes of the SEEAWP meeting on 19 November 2018 at Hampshire County Council

Present

Tony Cook (TC)	Chairman
Richard Read (RR)	SEEAWP Technical Secretary
Thomas Uglow (TU)	SEEAWP Secretariat
Dan Szymanski	Milton Keynes (Northhants)
Melissa Spriggs (MS)	Hampshire/Central and Eastern Berkshire Authorities
Paul Sanderson (PS)	Surrey
Thoma Light (TL)	Surrey
Peter Day (PD)	Oxfordshire
Elise Kinderman	West Berkshire
Rupy Sandhu	West Sussex
Bryan Geake (BG)	Kent
Emily Brown (EB)	Buckinghamshire
David Payne (DP)	Mineral Products Association
Jo Baker (JB)	Aggregate Industries
Brendan Kelly (BK)	Tarmac
Phil Aust (PA)	Day Group
Helen Hudson (HH)	Cemex
Nick Everington (NE)	Crown Estate

10. Welcome, Introductions and Apologies

The Chair welcomed everyone to the meeting. Apologies were received from Mark Chant (Milton Keynes), Chris Mills (IoW), Ross Crayford (Medway), Richard Ford (Brett), Sue Marsh (EEAWP), Pat Randall (East Sussex), Kirsten Williamson (South Downs National Park).

11. Minutes of the previous meeting: 16 July 2018

The Minutes were accepted.

12. South East England Aggregates Monitoring 2017 report

The Secretary informed members that there had been a few changes from the report that was considered by the previous meeting:

- The sand and gravel landbank is now 9 years instead of 10.5.
- There is only the equivalent of one year of reserves in the pending applications.
- Sales of recycled/secondary aggregate is the highest in the last decade.

EB stated that on Table 4 the Bucks data needed to be marked as confidential for soft sand (SS) sales and reserves.

PD referred to Appendix A (p44) – original figures now submitted and the changes agreed. .

The Chairman queried Table 11, the East Sussex FBA/IBA figures which should be clarified.

BG stated that there were two Table 12's.

PD referred to Appendix D, there was a site listed in Oxfordshire which was in fact in Kent.

The Chair proposed a change to Paragraph 12.2 in conclusions rather than "no indication its in jeopardy" instead would prefer it stated at "risk".

MS added that CEB is not mentioned in Appendix D.

The Secretary agreed that these matters would be clarified and amended and anything further sent to him within a week so he could make submit the AM report to the MHCLG.

Action 1: All members to submit comments by 7 December to the Secretary who will amend the South East England AM 2017 accordingly and submit it to the MHCLG

NB Since the meeting an amended factual footnote to Table 8 has been added thus:

A total of 50,710 tonnes of marine soft sand was sold at the wharves – 46,695 tonnes at West Sussex wharves, the rest from IoW and Hampshire

There were 322,160 tonnes of land-won sand and gravel sold at wharves in the Isle of Wight, Kent and Medway

13. Local Aggregates Assessment 2018

The Secretary introduced SEEAWP 18/03 and reported that PD had provided a note on the Oxfordshire LAA that had been circulated and DP had also provided some notes on the LAAs.

Milton Keynes

DS introduced the LAAs main points:

- The 3-year sharp sand and gravel (SSG) trend in 18/03 shows 0.9Mt - it should be 0.09Mt.
- Very good year with three sites operating at once.
- Current SSG landbank of only one year, but,
- In 2018 permissions were granted for two sites totalling 850,000 tonnes that would provide a healthy landbank.
- There is potential for review, although the mineral plan had only recently been adopted.
- Most imports of sand and gravel are from Northants or Buckinghamshire.

The Secretary added that the security of the supply of imported aggregates should be addressed. It was noted that this matter would have to be included in the Statement of Common Ground (SoCG) for a mineral plan review.

Buckinghamshire

EB reported that:

- SSG sales are at pre-recession levels.
- Confused sales trends; 10-year average downward but the 3-year average is upwards
- Landbank is currently healthy, but may be affected by demand from infrastructure projects.

DP noted that the LAA illustrates the issue of the 10 year average potentially under-estimating demand as it continues to fall while recent sales (3 years) are increasing (Fig 4) and EB agreed to make amendments to the LAA to reflect this.

Oxfordshire

PD reported that:

- SSG sales have increased, but 10-year average sales decreased again in 2017 but is expected to start increasing next year and Oxfordshire propose to maintain the Current LAA Rate.
- SS and crushed rock (CR) sales are now above the LAA Rate but this will not be changed at present, but will be monitored.
- Landbank is currently healthy.
- Anticipated shortfall of SSG at the end of the proposed mineral plans period; provision to be made in the Site Allocations Plan currently in preparation.
- Rail depots saw increased sales in 2017 and they are now at 90% capacity - a potential future issue.
- Recycled and secondary aggregates (R/SA) sales are currently at 50% capacity, but a poor survey response and it is estimated there is a much higher capacity available.

The Chair asked if there was any indication that the increase in CR sales was a result in a shift in demand. PD replied that he couldn't be sure what was happening, moreover, future availability of imports had not been addressed in the LAA.

DP thought the methodology approach used in the Oxfordshire's LAA for systematically examining potential reasons to deviate from the 10-year average sales as basis for the LAA Rate was helpful. PD added that the 10-year average sales should applied as an initial LAA Rate, but tested against other issues so it reflects demand.

PA added that one way of estimating demand would be to take per population aggregate demand and apply it to the population of the authority. The Chairman remarked that every mineral planning authority struggles with the issue of assessing demand but there is not an agreed methodology.

West Berkshire

EK advised that the LAA indicated:

- 2017 sales decreased as the remaining two quarries are both running out of resources.
- Landbank looks artificially healthy as reserve is in an inactive site.
- Currently progressing with the Local Plan.
- West Berkshire was a net exporter according to 2014 AM report but unsure that this is the case anymore.
- Rail depot capacity is satisfactory and a further operation has started to import aggregate.
- R/SA capacity still higher than sales.

DP had brief additional comments and queried if there were any conclusions about SS consumption. EK stated that three methodologies were used based on: housing, other infrastructure demands and, population so a variety of ranges were provided.

Central and Eastern Berkshire

MS reported:

- Slight sales increase in SSG during 2017.
- There is one large SSG site under consideration.
- R/SA sales have increased, but poor capacity response to AM survey so this was estimated using available data. Intending to use the East Sussex method of gathering this data in future.

The Secretary asked about the SS sources for CEB. MS responded that at the current time there was only anecdotal information but Bedfordshire and Buckinghamshire were some of the providers.

The Secretary thought that there are hard data issues for reporting on aggregate imports and exports but LAA's could include some narrative as to what is happening.

The Chairman asked what it would take to change the LAA Rate. MS responded that it depended on circumstances, but may need to take into account Oxfordshire's method. It was noted that the Heathrow Expansion would have a significant impact.

Hampshire

It was reported that:

- SS sales have increased, but SSG sales have declined
- There is still a low landbank, but there are proposals under consideration which are subject to EA issues.
- R/SA has decreased.
- Marine aggregates sales have decreased but there is a rail depots survey reporting issue, so the decrease is artificial and an estimate is to be included in revisions to the LAA.
- A review of the Hampshire Minerals and Waste Plan is being considered to commence in 2020.

NE stated that the Crown Estate landing statistics differ to Hampshire's.

The Secretary noted that the LAA Rate has been consistently above sales. MS replied that this had been examined and it was concluded it should be kept for the time being. .

Isle of Wight

It had been agreed at the last meeting that this LAA would be submitted at a later date.

Surrey

PS stated that:

- Surrey have decided to keep the relatively high LAA Rate because it gives capacity for further growth.
- Reviewing the minerals plan in 2020
- SS landbank currently healthy, low landbank for SSG.
- Currently applications in the pipeline which will hopefully be determined soon and help the landbank.
- Will be relying more on imports more, Surrey has been working with the Day Group to establish capacity of rail depots.

DP commented that it would be helpful to include a conclusion at the end of the LAA.

The Secretary stated that there was a problem assuming future supplies from other mineral planning authority areas as there may be capacity issues.

The Chairman suggested that the LAA should include some additional wording to account for this point.

West Sussex

RS reported that:

- Sales of SSG, Marine, and R/SA have increased
- SS sales have decreased.
- Estimating a shortfall of SS in the Mineral Plan
- Preparing a single issue review of the Plan on SS.

DP stated that the LAA wording seemed to hint towards a justification for not using lower figures in the LAA for SS and there seemed to be lots of reference to potential of marine resources. RS stated that the West Sussex approach was not to rely on marine SS as had been indicated to the Planning Inspector in advance of the Examination of the Joint Minerals Local Plan in September 2017.

The Chairman queried whether the South Downs NP Plan would affect the debate on SS supply but RS advised this did not affect the mineral plan review. The Chairman thought the SS issue would be a matter for a subsequent meeting.

RS advised that the mineral plan review would consider options (Regulation 18) in January 2019 and preferred option (Reg 19) in the summer of 2019. RS noted that 21 sites had been submitted (19 in the SDNP) for consideration.

DP highlighted that the LAA would be used in the public examination of the plan review. The Chairman suggested an interim letter from the AWP and HH agreed as the AWP needed to be careful not to endorse the LAA at this stage.

RS proposed to make changes to the West Sussex LAA and circulate them and it was agreed that he would circulate for comment a revised LAA.

East Sussex

East Sussex were not present and had apologised, but had submitted their draft LAA and updated dashboard data as requested before the meeting. As East Sussex were not in a position to address the queries raised by members consideration was deferred until the next meeting.

NB Subsequently at the request of East Sussex, the Chairman agreed that the LAA be considered by email correspondence.

Kent

BG stated that:

- Kent would continue with the 10-year average sales for the LAA Rates
- SSG 3-year average sales is artificially low as a major operator is extracting from the East Sussex side of a quarry that straddles the Kent-East Sussex boundary.
- An increase in reserves has inflated the landbank.
- Kent is becoming more reliant on marine aggregates but noted the availability of reserves in the off shore licensed areas.
- Wharves are currently working at 42% capacity.
- CR import have increased noticeably through the Wharves.

The Secretary remarked that Kent is a large producer of SS and supplying elsewhere and queried whether it is likely to change. BG replied that there are currently proposals under consideration in the emerging Kent Mineral Sites Plan work.

BG further reported that the East Sussex demand had been taken into account within the LAA rate.

Medway

In the absence of a Medway representative the Secretary noted that there was only one recently permitted SSG quarry so that low sales provided an unrealistic landbank estimate. There were large CR imports to the Isle of Grain wharf. JB added that CR is barged to Kent and sent by rail to London, even on some occasions being transported to Somerset.

Overall Comments

There was discussion about how trends should be presented in the LAA dashboards. PD suggested that it is much better to illustrate the direction of the 10 and 3-year average sales.

This was agreed by PA. It was also pointed out the POS/MPA LAA Guidance was published without some practice testing of some of the advice. There was also comments about use of colours (green/red) from an equalities perspective
Agreed the Secretary would circulate an advice note on LAA practice and report to next meeting.

The Secretary added that there is a general issue concerning capacity as the estimates are not all that accurate. Furthermore, the issue is more about infrastructure capacity rather than the capability of the aggregates sources. However, PA added that capacity isn't as black and white as it looks, there are lots of factors involved with calculating capacity. The Chairman asked whether industry had to keep applying for train paths as this affects capacity for the supply of CR. PA replied that they are not threatened if they are regularly used.

The Secretary added that the AM survey questionnaires do provide advice on the factors to be considered in responding to queries about capacity – this can be expanded if SEEAWP wished. Notwithstanding, the limitations on capacity data it is valuable evidence for safeguarding infrastructure.

It was appreciated that virtually all authorities had submitted LAAs and the Secretary thought that those discussed could be agreed by SEEAWP provided the caveats covered in these Minutes are addressed.

It was further agreed that in future that LAAs should substitute 3-year average sales data for confidential annual sales information.

The Chairman noted that a total regional picture of potential demand was needed and queried whether there had been an aggregation of regional data. DP said that the MPA's economist had prepared 'Regional Profiles' that had been circulated to members. These give some indication of short term – next five years – construction outlook (*SE growth average of 1.1% pa – slightly below national average of 1.3% pa*). DP said that the MPA would be meeting the MHCLG (Simon Gallagher) about aggregate matters.

The Chairman said he had not yet heard any mention of the AM national 4-yearly Survey for 2018. There was discussion about requesting the MPA about preparing a regional perspective of the GB scenarios that had been published. It was concluded that this request be deferred until MPA reported on the MHCLG meeting.

Action 2: Secretary to circulate the East Sussex LAA for consideration by email correspondence.

Action 3: Secretary to write to the authorities about their respective LAAs.

Action 4: Secretary to circulate a draft advice note on LAAs and particularly the 'dashboard' by 31 January 2019 and report to the next meeting.

5 NPPF / Planning Practice Guidance (PPG)

The implication of the new requirement in the Planning Practice Guidance for AWP's to be co-signatories of Statements of Common Grounds (SoCGs) for mineral plans was discussed. The Secretary raised the issue of programming this obligation with SEEAWP's calendar. There could be instances that decisions may have to be made between meetings. However, PD thought that delay would not be too much of an issue.

MS reported that a SoCG is currently being drafted for the Central and Eastern Berkshire Minerals and Waste Plan that would need to be signed by the AWP and multiple other authorities.

Kent were asked about their proposed SoCG and BG reported that this is likely to be prepared by April 2019."

HH asked for clarification of what actually goes into signing these off and PD clarified that SoCGs are not statements of agreement, but the contents/scope of them can be found in the PPG (paras 4.12- 4.17)

The Chairman added that it will be interesting to see how SoCGs progress especially at public examinations.

6 Future of Aggregate Working Parties

The Secretary advised that Chairman for the EEAWP had received an email on 8 November from MHCLG stating a one year roll forward of the current AWP contracts was being

considered. Subsequently the Ministry would engage with interested parties about a review of how the Managed Aggregate Supply System (MASS) would be most effectively administered.

The email mentioned nothing about the AM national 4 yearly Survey for 2018.

7 South East AM 2018 Survey

The Secretary explained that a new survey for road planings had been prepared and copies were circulated. He thought requesting historic data from highway authorities from 2009 may be over ambitious and this was agreed.

MS explained that collecting data on road planning arisings was part of the AWP contracts. PA queried what was actually meant by arisings and the Secretary explained that it was assumed that it was material planed off the road as part of highway maintenance – it was virtually 100% recycled either on site or at a later period.

There was discussion on details and it was agreed that comments on the form should be sent to the Secretary.

Action 5: Comments on the proposed road planings form for the South East AM 2018 survey be sent to the Secretary by 14 December.

8 Soft Sand

The Secretary asked whether it was worth the AWP considering a report on soft sand at a future meeting. The report would need an input from not only the mineral planning authorities, but also the MPA and Crown Estate.

MS stated that the mineral planning authorities would be preparing a position statement and this could contribute to SoCGs. It was intended that as this would be primarily factual and it was hoped could be agreed by the mpas before the SEEAWP April meeting.

Action 6: The SEEAWP mineral planning authorities report to the next SEEAWP meeting on a soft sand position statement.

9 Leicestershire LAA

The Secretary introduced SEEAWP 18/04, which had been prepared in response to a consultation from EMAWP about the Leicestershire LAA. There is a concern that sales of CR in Leicestershire are increasing above the 10-year average and that reserves are rapidly being depleted at two of the four rail linked quarries. This could have serious implications on sustaining CR supplies to both the South East and London. The Secretary stated that quarries in Leicestershire have limited landbanks, which will put pressure on the reserves of the two remaining quarries. It appears that the LAA does not conclude how to address this. It was noted that the report was a joint one to both SEEAWP and LAW.

Action 7: The Secretary write to the EMAWP about SEEAWP's concerns about the Leicestershire LAA.

NB Letter sent 22 November

AOB

BG stated that Burley Farm had been omitted from the LAA's list of inactive sites.

MS reported that Central and Eastern Berkshire will be issuing another Call for Sites.

EB asked that LAA submission deadlines be included in the Minutes.

Action 8: The mineral planning authorities should note the submission deadline for Local Aggregates Assessments 2019 is 14 October 2019.

10 Meetings 2019

All meetings at Hampshire Council, Ell Court, Sussex Street, Winchester

9th April 2019 – Mitchell Room – 14.00-17.00.

27th June 2019 – Ashburton Hall – 14.00-17.00

21st November 2019 – Mitchell Room – 14.00-17.00

Actions

Action 1: All members to submit comments by 7 December, to the Secretary who will amend the South East England AM 2017 accordingly and submit it to the MHCLG.

Action 2: Secretary to circulate the East Sussex LAA for consideration by email correspondence.

Action 3: Secretary to write to the authorities about their respective LAAs.

Action 4: Secretary to circulate a draft advice note on LAAs and particularly the 'dashboard' by 31 January 2019 and report to the next meeting.


Action 5: Comments on the proposed road planings form for the South East AM 2018 survey be sent to the Secretary by 14 December.

Action 6: The SEEAWP mineral planning authorities report to the next SEEAWP meeting on a soft sand position statement.

Action 7: The Secretary write to the EMAWP about SEEAWP's concerns about the Leicestershire LAA.

Action 8: The mineral planning authorities should note the submission deadline for Local Aggregates Assessments 2019 is 14 October 2019.

Respondent details:

Title:	Mr
First Name:	Mat
Last Name:	Ananin
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: HOUSING ALLOCATIONS (HA1, HA3-4, HA7, HA9-10, HA12-13, HA15, HA17, HA19, HA22-24, HA26-44)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

HA4 allows 350 new home with a single road access to services. The road is already heavily congested and the pollution during peak times must be a threat to the children living locally and attending the local school. There is no access to any local shops within reasonable walking distance which will force new residents to use vehicles. There is no access to any public transport either. This is a poorly thought out location for the volume of properties requested.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reduce the volume of builds. Remove the single developer allowing more self builds meaning a nicer array of different property types.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Increase the means of access for vehicles. A single congested point is not sufficient. Invest in on site infrastructure such as medical, dentistry and provisions.

Your suggested revised wording of any policy or text:

No longer part of the plan.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 18 December 2020 09:28
To: Planning Policy
Subject: Aspbury Planning (on behalf of Hamilton Russell) reg 19 response
Attachments: Completed comments form - Hamilton Russell - Upper Wharf.pdf; Fareham Publication LP Representation.Hamilton Russell.Upper Wharf.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Richardson <[REDACTED]>
Sent: 17 December 2020 15:43
To: Consultation <Consultation@fareham.gov.uk>
Cc: Tony Aspbury <[REDACTED]>
Subject: Representation to Publication Version of the Fareham Local Plan

Good afternoon,

Please find attached a representation to the Publication Version of the Local Plan, submitted on behalf of our client Hamilton and Russell

The following are submitted:

- Comments Form
- Representation Document

Please acknowledge receipt of this submission.

Kind regards

Caroline

Caroline Richardson MTCP MRTPI
Senior Planner

E: caroline@aspburyplanning.co.uk





MERRY CHRISTMAS

from the Aspbury Planning Team

FESTIVE SEASON CLOSURE:

Our last day of business will be Wednesday, 23rd December 2020
and we will re-open at 9am on Monday, 4th January 2021.

IMPORTANT NOTE FOR CLIENTS: CORONAVIRUS (COVID-19)

Like you, we have been working to address the challenges presented by the ever-changing coronavirus situation.

Please be assured that the smooth running of client projects is our top priority. At present, our office remains open and operational and we are committed to continuing to provide you with exemplary service and assistance during this uncertain time. Whilst we endeavor to operate as normal, we are also doing our part to help reduce the transmission of COVID-19 which measures include restricting travel and attendance at face-to-face meetings/events to safeguard our staff and enabling our team to work remotely (where necessary). Our office and staff remain contactable and available by telephone, video conferencing and via electronic communication channels.

We shall continue to monitor Government advice and will update you of any changes to our existing status or approach, as required.



Disclaimer:

Advice given or opinions expressed within this e-mail or attachments are those of the writer and unless otherwise stated, do not represent the views or beliefs of Aspbury Planning Ltd. The information in this e-mail and the information it contains are confidential and may be privileged and copyright protected. Any unauthorised use, disclosure, forwarding or copying is prohibited. E-mail communications are not secure and Aspbury Planning Ltd does not accept any legal responsibility for the message contents as it is transmitted over a public network.

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☐ No

A2 Please provide your details below:

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|---|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL



ASPBURY
Planning
Your Vision, Our Focus

Hamilton Russell

**Representation to the Publication version of the
Fareham Local Plan (2037) Consultation**

1.0 INTRODUCTION

- 1.1 This representation is submitted by Aspbury Planning Ltd on behalf of Hamilton Russell in response to the consultation on the Publication Version of the Fareham Local Plan 2037. The representation will provide responses to specific questions set out in the consultation form.
- 1.2 These representations are made in the context of our Client's interest in land at Upper Wharf, Fareham, outlined in red on Figure 1 below. Previous representations have been made regarding this site on behalf of Tarmac Trading Ltd.



Figure 1 – Upper Wharf, Fareham Site

2.0 RESPONSE TO CONSULTATION FORM QUESTIONS

B1 – Which part of the Local Plan is this representation about?

2.1 This representation responds to the following:

- Policy H1: Housing Provision and Housing Allocation Policies
- Policy HP4: Five -year Housing Land Supply
- Policies Map: Upper Wharf - Mineral Safeguarding Area

B2 - Do you think the Publication Local Plan is:

2.2 Our response to question B2 is:

- Legally compliant – No
- Sound – No
- Complies with the duty to co-operate – No

B3 Please provide details you have to support your answers above

- 2.3 As detailed above this representation has been prepared on behalf of Hamilton Russell in relation to the Upper Wharf, Fareham Site.
- 2.4 For the Fareham Local Plan 2037 to be found sound under the four tests of soundness as defined by the National Planning Policy Framework (NPPF) (paragraph 35), the Plan should be positively prepared, justified, effective and consistent with national policy.
- 2.5 Under Policy H1 it is considered that the Publication Local Plan should allocate additional sites to accommodate for **at least 8,389** ensuring a sufficient contingency in order to ensure that the plan meets objectively assessed development requirements and is consistent with the NPPF.
- 2.6 Fareham is identified as the main town in the Borough and the identified strategic priorities include to *‘In the first instance maximise development within the urban area and away from the wider countryside, valued landscapes and spaces that contribute to settlement definition.’* Subsequently the Borough’s main town, Fareham is the ideal location for housing and the Council should seek to maximise housing in this sustainable location.
- 2.7 The Development Strategy and chosen sites have been shaped through analysis of the evidence base which includes the Strategic Housing and Employment Land Availability Assessment (SHELAA) September 2020.

- 2.8 The NPPF and Planning Practice Guidance require Local Plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 2.9 The SHELAA, September 2020 was produced to consider sites, such as the Upper Wharf site ref: 3222, that have been promoted to the Council during the Regulation 18 Local Plan consultations. However, the SHELAA considered the site should be discounted on the reason *Safeguarding of Aggregates Wharf within Minerals and Waste Plan and site is located within flood zones 2 and 3*.
- 2.10 We dispute this reason for discounting the site. Firstly, a Mineral Infrastructure Safeguarding Assessment has been commissioned by our client and undertaken by Land & Mineral Management.
- 2.11 The report was produced for the specific purpose of assessing the requirement for safeguarding of mineral infrastructure at Fareham Wharf. The assessment concluded that whilst Fareham Wharf is safeguarded as a marine aggregates wharf due to its small size, coupled with the difficult marine access that prevents large dredgers using it, it has become commercially inviable to continue operations as a marine aggregate wharf.
- 2.12 Over recent years, the site has been decreasingly used, with no aggregates landed in the last two years. Tarmac have attempted to sell or lease the Wharf as a marine aggregates wharf and have had no interest from the market due to its unviability. It is therefore proposed to develop the Wharf for non-mineral related use.
- 2.13 This assessment clearly demonstrates that the Wharf is no longer needed as a marine aggregates wharf and that there is sufficient capacity in Hampshire's other mineral wharves and the loss of the Wharf can be tolerated without reducing Hampshire's capacity to an unacceptable level. The Wharf no longer needs to be safeguarded and should be made available for alternative development.
- 2.14 On the basis of this assessment we consider that there is no requirement to safeguard the site for minerals in the Minerals and Waste Plan and emerging Local Plan. A copy of the Mineral Infrastructure Safeguarding Assessment can be made available on request.
- 2.15 Notwithstanding the above a marketing report has also been produced by Savills which provides clear evidence that there is no demand and need for the site as a wharf. Further demonstrating safeguarding the site for minerals is not required and the site should be considered for housing development. A copy of this report can be made available on request.

- 2.16 The reason given in the SHELAA for discounting the site makes reference to the site being located within Flood Zones 2 and 3. This reason for discounting the site is also disputed.
- 2.17 An extract of the Government Flood Map for planning is provided below which clearly demonstrates that whilst the Upper Wharf site is shown to be within Flood Zones 2 and 3 and the surrounding area is within Flood Zone 1.

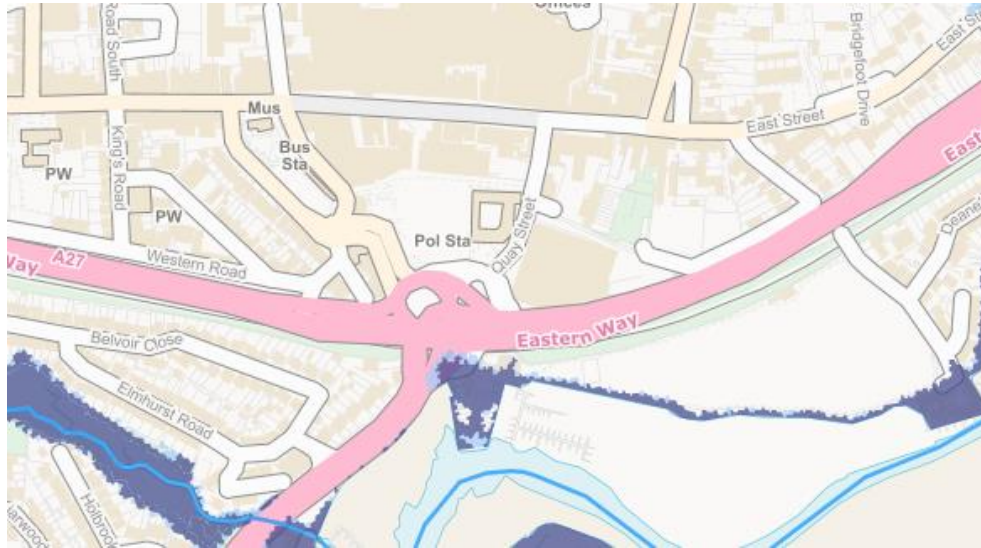


Figure 2 – Flood Map for Planning Extract

- 2.18 A Flood Risk Assessment has been commissioned and the report concluded that the ground levels of the site can be slightly raised to mitigate any potential impact from flooding and this would have no effect upon the surroundings in flood risk and drainage terms. Accordingly, the site is therefore considered suitable for residential development. A copy of the Flood Risk Assessment can be made available upon request.
- 2.19 Furthermore, there would be an environmental benefit to the redevelopment of the site through biodiversity net gain and the removal of the prospect of the site being used as a wharf which creates noise and disturbance to its surroundings.
- 2.20 The reasons for discounting the site have clearly been addressed by the technical evidence prepared and the site is a suitable location for residential development.
- 2.21 The site is available for development now and there is active developer interest in the early delivery of residential development on the site.

- 2.22 This brownfield site is ideally located within the Borough's main town of Fareham. The site is not unduly constrained in terms of access, topography, ecology, flood risk, or heritage and is no longer required to be safeguarded for minerals. The site is not constrained by ownership issues and there is strong developer interest in the site for residential development from our client.
- 2.23 The site is available for residential development now, it is considered to be a suitable site in a sustainable location for growth with development readily achievable to commence and deliver new dwellings within the next five years. The site is within a sustainable location in terms of access to essential shops, services and infrastructure.
- 2.24 The allocation of this site for housing would help achieve the Government's aims and objectives regarding the delivery of additional residential stock throughout the Country and boost supply in the Borough. There are no insurmountable physical constraints which would prevent the efficient use of this site for residential development.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

- 2.25 Allocation of the Upper Wharf, Fareham site SHELAA ref: 3222 for housing development and removal of the Mineral safeguarding designation.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 2.26 It is considered that the Publication Local Plan should allocate additional sites to accommodate for at least 8,389 dwellings ensuring a sufficient contingency in order to ensure that the plan meets objectively assessed development requirements and is consistent with the NPPF.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- 2.27 Yes, we consider it necessary to participate.



ASPBURY Planning

Your Vision, Our Focus

20 Park Lane Business Centre
Park Lane, Basford, Nottingham NG6 0DW
T: 0115 852 8050
E: office@aspburyplanning.co.uk

www.aspburyplanning.co.uk

Aspbury Planning Ltd.
Registered in England and Wales No.4600192
VAT Registration No. 365 1371 58

Registered office: 4 Bank Court, Weldon Road
Loughborough, Leicestershire LE11 5RF

Respondent details:

Title:	Mr
First Name:	Robin
Last Name:	Moxon
Job Title: (where relevant)	Development and Planning Director
Organisation: (where relevant)	Arlington Business Parks GP Limited (Arlington)
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 6.17

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Representations in respect of Paragraph 6.17 and Table 6.3: Arlington is the owner of Solent 2, which is one of the three sites identified in Strategic Policy E1 in the Publication Local Plan as allocated for employment uses. Solent 2 is already allocated in the adopted Fareham Local Plan Part 2 (Development Sites and Policies Plan – adopted June 2015) as an employment site, specifically allocated to encourage economic development in the Borough. Within Chapter 7 of the adopted Local Plan Part 2, the Development Brief for Solent 2 is detailed within Employment Site E1. The Development Brief identifies the potential use and floorspace capacity as being ‘employment floorspace (B1, B2 or B8) of approximately 23,500 square metres’. In Paragraph 6.17 of the Publication Local Plan, the Council acknowledges that: ‘the Council needs to identify suitable sites that provide a realistic chance of delivery and provide for flexibility and choice’. The Paragraph also refers to Table 6.3, which identifies the sites which will form the Employment Allocations within the Local Plan. Table 6.3 seeks to specify the amount of floorspace between the B1, B2 and B8 uses for Solent 2, which is in fact a less flexible policy than currently exists in the adopted Local Plan Part 2. Moreover, from Arlington’s experience of marketing Solent 2 for many years, most recent commercial interest in the site has been for B8 uses, given the site’s highly accessible location next to J9 of the M27, which makes it suitable for the logistics sector, which has experienced a greater surge in demand, due to the huge shift in consumers’ shopping habits towards online retail. In controlling or specifying the amount of floorspace that could be delivered within each use class at Solent 2, will result in a policy which contradicts Paragraph 6.17 which provides for: ‘flexibility and choice’. It is also important to recognise that whilst the Council is seeking to allocate three sites, not all of those sites have the infrastructure in place to be available for development now. Solent 2 is available now, and therefore is a deliverable site, which can support a range of employment development opportunities. Therefore, Arlington ‘objects’ to Table 6.3 and advocates that it should be amended to remove the floorspace ‘caps’ on each type of business use. This would enable the Borough to meet market demand should it come forward within a particular use class, particularly when other sites may not be available for development now, and therefore there are limited opportunities within the Borough. As drafted, Paragraph 6.17 and Table 6.3 of the Publication Local Plan do not meet the test of soundness because they are not consistent with national policy, in that they do not comply with relevant paragraphs of the National Planning Policy Framework (NPPF). In particular, Paragraph 11 states that: ‘Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change’. Further, Paragraph 6.17 and Table 6.3 do not comply with Paragraph 81, which states that: ‘Planning policies should... be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances’. Furthermore, as drafted, Paragraph 6.17 and Table 6.3 do not comply with Paragraph 82, where: ‘Planning policies ... should recognise and address the specific locational requirements of different sectors. This includes making provision for... storage and distribution operations at a variety of scales and in suitably accessible locations’. As already stated in these representations, Solent 2 is situated in a highly accessible location next to J9 of the M27, which makes it a very suitable location for the logistics sector, which has experienced a greater surge in demand, both locally and nationally. This is also evidenced by the enquiries that Arlington has received in recent years in respect of the Solent 2 site. Arlington contends that the adopted policy for Solent 2, set out in the Development Brief E1 of the Local Plan Part 2 (Development Sites and Policies Plan), which was only adopted in 2015, is sufficiently flexible to comply with Paragraphs 11, 81 and 82 of the NPPF, and this policy position should remain unchanged in the new Local Plan. In conclusion, Arlington proposes that Table 6.3 is amended to remove the floorspace ‘caps’ on each type of business use for Solent 2, and instead, propose an overall quantum of 23,500 sq m of floorspace, which would ensure that the Local Plan policy is sound, complies with the NPPF, and is flexible in supporting a wide range of business uses that could come forward on the site during the Plan period.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Arlington proposes that Table 6.3 is amended to remove the floorspace ‘caps’ on each type of business use for Solent 2, and instead, propose an overall quantum of 23,500 sq m of floorspace.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

As set out in our representations, this modification would ensure that the Local Plan policy is sound, complies with the relevant paragraphs of the NPPF, and is flexible in supporting a wide range of business uses that could come forward on the site during the Plan period.

Your suggested revised wording of any policy or text:

Please refer to the proposed amendments to Table 6.3, which removes the floorspace ‘caps’ on each type of business use for Solent 2, and instead, proposes an overall quantum of 23,500 sq m of floorspace.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Arlington is the owner of Solent 2, one of the three main sites which are allocated for employment in the Publication Local Plan. Arlington is a national business park developer and has in-depth experience in the commercial development and occupier market within Fareham and the wider Hampshire market.

2) Paragraph: 6.23

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Arlington is the owner of Solent 2, which is one of the three sites identified in Strategic Policy E1 in the Publication Local Plan as allocated for employment uses. Solent 2 is allocated in the adopted Fareham Local Plan Part 2 – Development Sites and Policies Plan (adopted June 2015) as an employment site, specifically allocated to encourage economic development in the Borough. Within Chapter 7 of the adopted Local Plan Part 2, the Development Brief for Solent 2 is set out in Employment Site E1. The Development Brief identifies the potential use and floorspace capacity as being ‘employment floorspace (B1, B2 or B8) of approximately 23,500 square metres. Arlington accepts the Council’s view that Solent 2 is: ‘in a strategic location next to Junction 9 of the M27 and benefits from an existing employment allocation within Local Plan Part 2 (2015)’ as well as the comment in the Business Needs, Site Assessments and Employment Land Study that the site is a ‘commercially attractive site for the proposed Office or Industrial uses’. Arlington objects to the conclusion that the site has: ‘access and congestion constraints’ which would make the site ‘less suitable for warehouse and distribution uses’. This is unsound on the basis that the conclusion is not ‘justified’. Solent 2 is in a highly accessible location next to Junction 9 of the M27, which makes the site very suitable for warehouse and distribution development, as well as the consented office use. Arlington does not agree that the site has access or congestion constraints. Furthermore, if an alternative proposal for warehousing or distribution use were to come forward instead of the extant planning permission for offices, it would generate fewer peak hour vehicular trips compared to the site’s consented office use. Therefore, Arlington proposes that the following words are deleted from Paragraph 6.23 which would ensure the Paragraph meets the tests of soundness: ‘although the preference would be for office use. The location with its access and congestion constraints would make this site less suitable for warehouse and distribution uses’.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Arlington proposes that the following words are deleted from Paragraph 6.23 which would ensure the Paragraph meets the tests of soundness: ‘although the preference would be for office use. The location with its access and congestion constraints would make this site less suitable for warehouse and distribution uses’.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

The proposed deletions will remove comments within Paragraph 6.23 which are not justified. Therefore, by removing those comments, the Paragraph would be justified, and therefore, sound.

Your suggested revised wording of any policy or text:

Arlington suggests that the following words are deleted from Paragraph 6.23 which would ensure the Paragraph meets the tests of soundness: ‘although the preference would be for office use. The location with its access and congestion constraints would make this site less suitable for warehouse and distribution uses’.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Arlington is the owner of Solent 2, which is one of the three sites identified in Strategic Policy E1 in the Publication Local Plan as allocated for employment uses. It is critical that employment policies relating to Solent 2 do not restrict the site's attractiveness to the market over the Plan period. Arlington is a national business park investor and developer and has in-depth experience of the commercial development and investment market in Fareham and the wider Hampshire area. For these reasons, it is necessary for Arlington to take part in the hearing sessions.

3) Paragraph: 6.15

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Arlington is the owner of Solent 2, which is one of the three sites identified in Strategic Policy E1 in the Publication Local Plan as allocated for employment uses. Arlington supports the general thrust of Paragraph 6.15 and the Council's recognition of the need to: 'provide a range of modern good quality floorspace' and 'encourage a diverse range of economic growth' and 'ensure that the needs of new and growing businesses are met'. In doing so, it is important that the Council also provide a flexible approach to employment use within the allocated employment sites, without restricting the split of uses across different use classes, which would act as a barrier to supporting certain types of employment development opportunities which will come forward during the Plan period. Furthermore, this flexible approach would ensure that the policies comply with Paragraph 81(d) of the National Planning Policy Framework (NPPF, 2019) which states that planning policies should: 'be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances'.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Please refer to Arlington's response to Paragraph 6.17 and Table 6.3, and Paragraph 6.23.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Please refer to Arlington's response to Paragraph 6.17 and Table 6.3, and Paragraph 6.23.

Your suggested revised wording of any policy or text:

Please refer to Arlington's response to Paragraph 6.17 and Table 6.3, and Paragraph 6.23.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Please refer to Arlington's response to Paragraph 6.17 and Table 6.3, and Paragraph 6.23.

Respondent details:

Title:	Mr
First Name:	Martin
Last Name:	Ashdown
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA36 - Locks Heath District Centre

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The proposed allocation is not in alignment with policy R1. The proposed allocation will remove parking for the shopping centre and add additional housing units. Note also that some 800-1000 new units are proposed in the catchment areas so demand for access and parking will increase whilst it is already stretched at peak. Any reduction of parking will have a negative impact on usage of the Centre.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA36 or require provision of at least same number of parking units displaced by it.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

.

Your suggested revised wording of any policy or text:

.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: HA36 - Locks Heath District Centre

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The proposed allocation is not in alignment with policy R1. The proposed allocation will remove parking for the shopping centre and add additional housing units. Note also that some 800-1000 new units are proposed in the catchment areas so demand for access and parking will increase whilst it is already stretched at peak. Any reduction of parking will have a negative impact on usage of the Centre.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the policy or require provision of at least as many displaced parking spaces.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

.

Your suggested revised wording of any policy or text:

.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Policy: HA37 - Former Locks Heath Filing Station

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The proposed allocation is not in alignment with policy R1. The proposed allocation will remove parking for the shopping centre and add additional housing units. Note also that some 800-1000 new units are proposed in the catchment areas so demand for access and parking will increase whilst it is already stretched at peak. Any reduction of parking will have a negative impact on usage of the Centre.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove policy or require at least the same number of parking spaces removed to be reinstated in new development

How would the modification(s) you propose make the Local Plan legally compliant or sound?

.


Your suggested revised wording of any policy or text:

.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mrs
First Name:	Wendy
Last Name:	Ball
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: DS1 - Development in the Countryside

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

It is indeed very important to protect our countryside from unplanned and large-scale development. Sites of biological or geological value must be conserved and enhanced. This is also true for agricultural land and undeveloped coastlines.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: DS2 - Development in the Strategic Gaps

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Strategic Gap DS2: The Strategic Gaps, as currently defined, preventing the coalescence of urban areas and separating the identities of settlements are essential.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Policy: DS3 – Landscape

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The eight areas of Special Landscape Quality within the Borough must be protected and enhanced.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Policy: CC1 - Climate Change

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Strategies to mitigate and adapt to climate change must be adopted. Addressing the problem by including measures to minimise the need for travel, to ensure sustainable drainage and to enhance biodiversity are valuable elements in the strategy. Maintaining and improving tree canopy in the Borough is very important.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

5) Policy: NE1 - Protection of Nature Conservation, Biodiversity and the Local Ecological Network

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Also NE6. It is very necessary that sites of nature conservation are protected and enhanced. Geodiversity and biodiversity, including the ecological network, must be conserved. Trees, woodland (especially ancient woodland) and hedgerows provide habitats and biodiversity helping to mitigate climate change and, therefore, must be protected and enhanced. The Stubbington Study Centre is of particular value since, not only does it provide refuge for nature but also provides education for the younger generation.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

6) Policy: TIN1 - Sustainable Transport

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Improvement is indeed needed with respect to local public transport networks, cycling and walking routes. There should be a reduced need to travel by motorised vehicle.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

7) Policy: HE1 - Historic Environment and Heritage Assets

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HE1-4 The historic environment of Fareham includes a wide-varying and valuable collection of heritage assets (archaeological to 20th century), which it is important to conserve and enhance. It is imperative that the design of any essential development within a historic conservation area should be of high quality compatible with the architecture of the surrounding historic buildings in terms of height, layout, design detailing and material.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

8) Policy: D1 - High Quality Design and Placemaking

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

All developments of dwellings or employment must be of high-quality and in keeping with the character of the site. Such developments should be accessible by public transport, cycling and walking routes. High-quality in architecture, scale, proportion, material and detailing is important. Spacing should be such as to allow landscaping for the planting of shrubs and trees between.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	David
Last Name:	Barry
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA45 - Rear of 77 Burr ridge Road

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

This Housing Policy should seek to be inclusive. The current gypsy site in Burr ridge Road works because it is a single family home fronting onto the road and the residents are part of Burr ridge Road. By creating an exclusive camp behind it, instead of seeking similar family sites across the Fareham Borough Council area, the Policy is creating a separate community within a community, rather than seeking to integrate and include people into the community. The Policy does not meet the criterion for Inclusive Design which states that development should provide accommodation for all people, regardless of their age, gender, mobility, ethnicity or circumstances. Furthermore, this site does not meet all of the criteria laid out in Policy HP11 The development is in the Countryside and is less than 600 metres from the River Hamble The proposed sites are behind the building line of the road which is not in line with current Council policy The choice of this particular site appears to be a convenient solution for the Council to meet targets and does not serve the best interests of the community or the travellers wishing to live in permanent accommodation.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The three sites should be inclusive and spread across the whole Fareham Borough Area instead of the exclusive sites solely for a single group.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

By complying with guidelines for Inclusive Design

Your suggested revised wording of any policy or text:

The Council propose to seek out suitable sites where traveller families can live within the Fareham Borough Council community

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	mr
First Name:	stuart
Last Name:	batin
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: AREAS OF SPECIAL LANDSCAPE QUALITY (DS3)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Recent planning decisions in the Borough have highlighted the need to consider the designation of 'valued landscapes' as part of the Local Plan. And with the correct decision to remove the Land to the South of Romsey Avenue (HA6), no doubt based on the environmental importance given to this land by Natural England. To ensure this plan can be classed as sound you now need to afford and classify the land south of Romsey avenue within the demarcation of 'Areas of Special Landscape Quality'. Even the more recent 'Technical Review of Areas of Special Landscape Quality and the Strategic Gaps' (2020) should be amended to include the Land south of Romsey Avenue to demonstrate complete and definite commitment by Fareham borough council to our Environment.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

To ensure this plan can be classed as sound you now need to afford and classify the land south of Romsey avenue within the demarcation of 'Areas of Special Landscape Quality'. Even the more recent 'Technical Review of Areas of Special Landscape Quality and the Strategic Gaps' (2020) should be amended to include the Land south of Romsey Avenue to demonstrate complete and definite commitment by Fareham borough council to our Environment.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Demonstrate complete and definite commitment by Fareham borough council to our Environment and protect important primary support areas for the Portsmouth Harbour SPA for generations to come.


Your suggested revised wording of any policy or text:

include farm land to the south of Romsey Avenue on maps as Area of Special landscape quality and/or strategic gaps

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Andy
Last Name:	Beadsworth
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA32 Allocation should be removed from the development plan. HA32 is an allocation in the Hamble Valley Area of Special Landscape Quality, paragraph 3.9 of the Development plan says 'there remain no development allocations in these areas.' Inclusion of HA32 contradicts paragraph 3.9 Planning status of HA32 as noted in the Development plan reads 'Planning Status as at 1st July 2020: Outline planning permission granted (P/18/0592/OA)'. This is not true. The planning committee meeting did not take place until 19th August 2020. This could be indicative of FBC pre-determining the decision that the councillors might make and therefore be unlawful. HA32 is the subject of Judicial Review because it did not comply with the policies in the extant plan, the Nitrate calculation included as mitigation relies on untenable assumptions, the application does not include land needed to reach the public highway. The site is considered by residents, and a leading planning QC to be undeliverable due to a number of reasons & therefore should not be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 from the allocation Development in the countryside specifically this natural buffer between the river Hamble and the built up areas should be resisted.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the plan

Your suggested revised wording of any policy or text:

Remove HA32 allocation and other similar proposals in this area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	mr
First Name:	Alastair
Last Name:	Beardsall
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA32 Allocation should be removed from the development plan. HA32 is an allocation in the Hamble Valley Area of Special Landscape Quality, paragraph 3.9 of the Development plan says 'there remain no development allocations in these areas.' Inclusion of HA32 contradicts paragraph 3.9 Planning status of HA32 as noted in the Development plan reads 'Planning Status as at 1st July 2020: Outline planning permission granted (P/18/0592/OA)'. This is not true. The planning committee meeting did not take place until 19th August 2020. This could be indicative of FBC pre-determining the decision that the councillors might make and therefore be unlawful. HA32 Is the subject of Judicial Review because it did not comply with the policies in the extant plan, the Nitrate calculation included as mitigation relies on untenable assumptions, the application does not include land needed to reach the public highway. The site is considered by residents, and a leading planning QC to be undeliverable due to a number of reasons & therefore should not be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 Allocation

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the Local Plan


Your suggested revised wording of any policy or text:

Remove HA32 Allocation

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Graham
Last Name:	Bell
Job Title: (where relevant)	CEO B
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 5.99

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The proposed site is not compliant for the following reasons 1 the existing site constantly floods contrary to policy HP11 point F further development will increase the flooding of neighbouring properties 2 The adjoining land is a designated (SINC) and has already been impacted . Further development will accelerate the situation 3 The site has no immediate or reasonable access to shops ,schools community and health facilities and in fact there has been a dramatic reduction in public transport in the area with the abolishment of the bus stop and reduction of routes contrary to HP11 point b 4 the current site has in excess of 8 vehicles on a substantial part of the property and also uses on street parking adjacent to other properties on the street along with this entrance and exit onto a single road with no pavement is already overcrowded and dangerous {HP11 point f} 5 the development is not in keeping with the surrounding area 6 with the current occupiers applying to build permanent residential homes on the site does this not negate the determination of “travelling gypsy “ 7 the access road is owned by a third party not the council

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Leaving the existing limitations of one site in place as originally quoted by the inspectorate that it was suitable for one plot .

How would the modification(s) you propose make the Local Plan legally compliant or sound?

This would eradicate all the points I previously made where i feel the policies and considerations have not been applied properly

Your suggested revised wording of any policy or text:

Paragraph 5.99 should read that ‘the site to the rear of 77Burridge road is not suitable to accommodate further Gypsy ,traveler sites

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I own and live with my family adjacent to the proposed site and am impacted directly by 1 the social wellbeing impact on my family living next door 2 the increased dangers of substantial traffic increase on an already dangerous single track road 3 potential feuding impact on my property

Keely, Lauren

From: Michael Knappett [REDACTED]
Sent: 16 December 2020 22:14
To: Consultation; Planning Policy
Subject: BJC Planning reg 19 response
Attachments: Site Plan Framework Plan.pdf; 2020.12.16 Local Plan Reps.pdf

Dear Sir/Madam

Please find attached representations and a Site Plan Framework Plan which the Council is requested to consider. These are submitted on behalf of Land & Partners Ltd and relate to Policy HA1 and Figure 4.1: Policy HA1 Indicative Framework Plan.

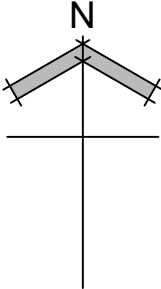
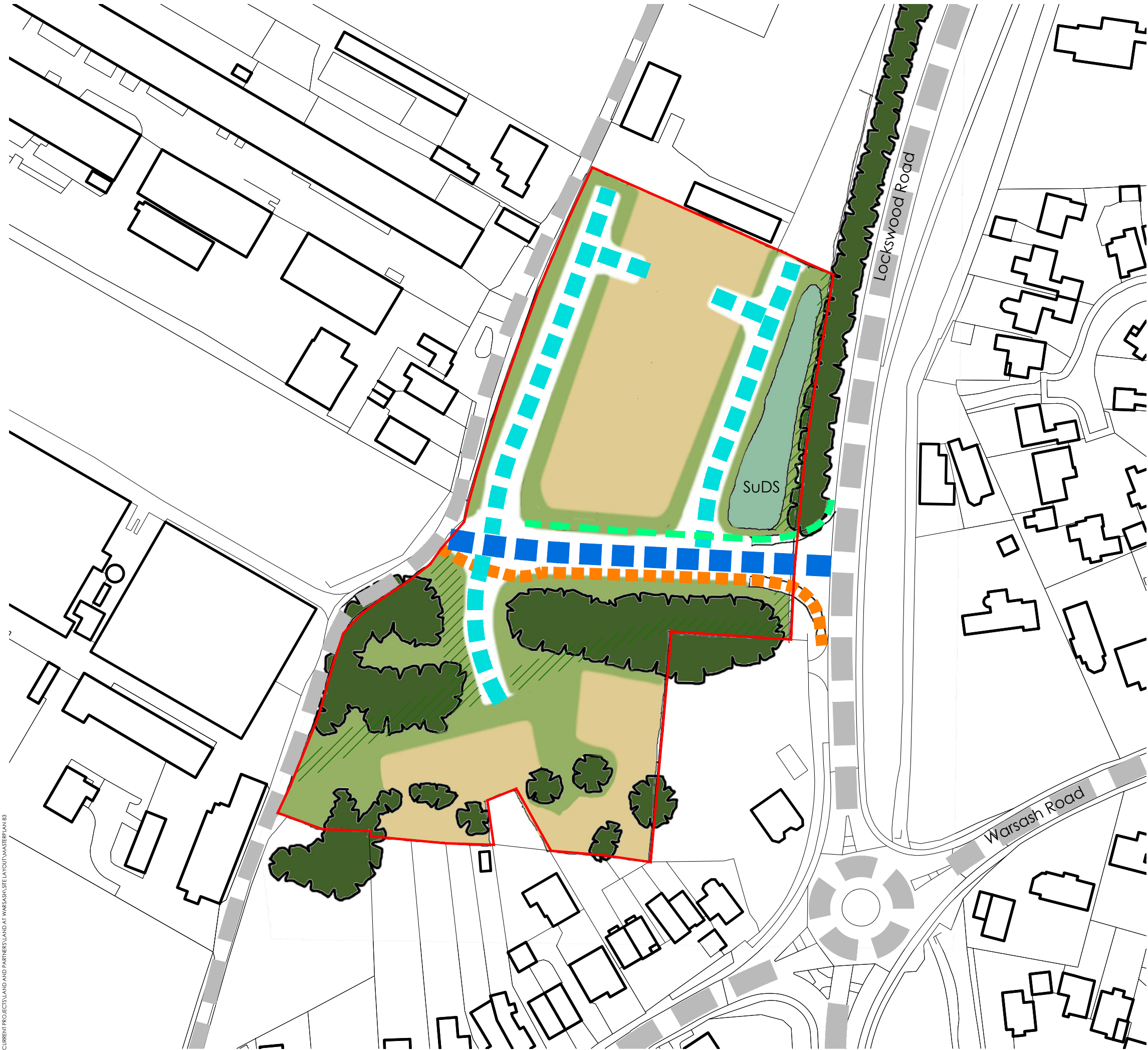
Regards

Michael Knappett

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk









This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.



© This drawing and the works depicted contains information that is the copyright of Carlton Design Partnership Ltd. This drawing may also contain copyrighted information of third parties. This drawing or part thereof may not be reproduced, re-used or altered except with the written permission of the originators. No liability will be accepted for amendments made by third parties. Scaled measurements must not be taken from this drawing, other than for planning purposes. Any discrepancy or disparity must be notified to the originator in writing. This drawing may contain Ordnance Survey Data that is subject to Crown Copyright. All Rights reserved.

Rev	Date	Drawn	Checked

Legend

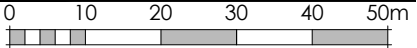
-  Existing Landscape
-  Existing Roads
-  Low-Medium Density Residential
-  Primary Vehicular and Pedestrian Route
-  Secondary Vehicular and Pedestrian Route
-  Primary Pedestrian Route
-  Cycle / Pedestrian Route
-  Ecological Corridors

Project:
LAND WEST OF LOCKSWOOD ROAD
WARSASH

Drawing Title:
SITE PLAN
FRAMEWORK PLAN



1:1000
@A3



Drg No: 151210/SL/FP Rev: -

A1 Is an Agent Appointed? Yes

A2 Please provide your details below: Land & Partners Ltd c/o Agent

A3 Please provide the Agent's details (if applicable):

Mr Michael Knappett
Principal Planner
BJC Planning
The Gallery
3 South Street
Titchfield
Hampshire
PO14 4DL



B1 Which part of the Local Plan is this representation about?

A paragraph Go to B1a

A policy Go to B1b X

The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction). N/A

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA1 - North and South of Greenaway Lane, Warsash and Figure 4.1: Policy HA1 indicative Framework Plan

B1c Which part of the Policies Map? N/A

B2 Do you think the Publication Local Plan is:

Legally compliant Yes

Sound No

Complies with the duty to co-operate No comment

B3 Please provide details you have to support your answers above

Legally compliant There is no reason to believe the Plan has not met the legal requirements for plan making as set out by planning laws.

Complies with the duty to co-operate The onus is on Fareham Borough Council to demonstrate that the Plan complies with the duty to co-operate. It will have to provide evidence that it has engaged and worked effectively with neighbouring authorities and statutory bodies.

Sound Land & Partners Ltd considers that Policy HA1 and Figure 4.1: Policy HA1 indicative Framework Plan, as currently written, is unsound.

Land & Partners Ltd has recently sold land on behalf of the landowners and within the housing allocation. This comprised land west of the track serving Greenaway Lane and Warsash Road and which was subject to the outline planning application P/17/0998/OA and SHELAA site reference 3056.

This representation relates to the residual land east of the track and covered by the outline planning application P/17/0998/OA and SHELAA site reference 3056, as well as additional land at 59 Greenaway Lane (SHELAA site reference 3189).

There is continued support for housing allocation HA1 and the increase to the housing allocation indicative yield by the Council, up from 700 dwellings to 824 dwellings. However, the exclusion of land at 59 Greenaway Lane from the same allocation is objectionable. The Council seeks to include this land in the urban area but not the housing allocation.

The Council's own analysis of land at 59 Greenaway Lane within their 2020 SHELAA confirms that the site is considered suitable for development as part of the proposed Warsash cluster allocation. It is not clear, therefore, why the Council has chosen not to include this available 0.33-hectare site within the proposed allocation. The policy is unsound on this basis.

The majority of the criteria and requirements of Policy HA1 and Figure 4.1: Policy HA1 indicative Framework Plan are supported (a, b, c, e, f, h, i and j); however, criteria d, g and k, as currently written, are not justified nor effective.

d)

Figure 4.1 is an expression of the Council's aspirations for housing allocation. This includes indicative wildlife corridors and Land & Partners would like flexibility for the 3m ecology corridors to be provided within the residual land to be determined as part of the forthcoming planning application. This is especially relevant within the south-eastern corner of SHELAA site 3056, where ecology corridors would be designed as part of the scheme around the housing and trees within that part of the site. As it currently stands, the notation of existing woodland or treed areas within the south-eastern corner of the site within Figure 4.1 is not accurate and identifies far more tree cover than actually exists. This does not reconcile with the protected trees identified within the Council's red line allocation boundary plan.

There is no need for a footpath route through the whole of the south-eastern corner of the site, as to provide one along the alignment envisaged within Figure 4.1 would render this part of the site undevelopable. There would be pedestrian access into this area to the individual dwellings, but not as route through for the general public.

There is an objection to the green notation adjoining Lockwood Road within Figure 4.1, as this area is required for Sustainable Urban Drainage. The Council has already resolved to grant application P/17/0998/OA including this.

The five mobile homes indicated adjoining the track within Figure 4.1 would be removed as the site would be redeveloped.

g)

There is an objection to criterion g), as this requires all existing protected trees to be retained and incorporated within the development. This criterion does not take any account of the category or amenity values of the existing trees, nor does it provide any flexibility to allow for the removal of low, medium and higher amenity trees, where required, and their replacement

as part of a proposal. This is especially the case within the south-eastern corner of the site subject to SHELAA site 3056 and on land at 59 Greenaway Lane (SHELAA site 3189).

k)

Off-site improvements to existing sports facilities are not justified and have not been requested as part of the any of the planning applications to date. The Council has not provided any evidence of existing deficiencies with off-site sports facilities and as such any improvements should be funded by contributions from the Council's Community Infrastructure Levy.

It is now the intention for Land & Partners Ltd to prepare and submit a new planning application for the residual land in due course. This would include provision for primary and secondary roads, vehicular, cycle and pedestrian routes, ecological corridors, low/medium density housing and Sustainable Urban Drainage. The submitted Site Plan Framework Plan prepared by Land & Partners Ltd identifies these features and how the residual land to the east of the track could be developed.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound? You put in all the evidence and information needed to support your representation.

The Council should make the following amendments to make policy HA1 and Figure 4.1 sound:

- Include land at 59 Greenaway Lane (SHELLA site 3189) within the housing allocation boundary red line;
- Amend criterion d) and Figure 4.1 to make clear that there should be flexibility for ecology corridors to be determined as part of individual planning applications;
- Delete the green hatched notation adjoining Lockwood Road within Figure 4.1, as this area is required for Sustainable Urban Drainage;
- Delete the footpath link through the south-eastern corner of the housing allocation within Figure 4.1 and replace with a Cycle and Pedestrian route which runs from Lockwood Road to the track, as per the submitted Site Plan Framework Plan prepared by Land & Partners Ltd;
- Remove the five mobile homes to the east of the track within Figure 4.1;
- Figure 4.1 should be amended to ensure the protected trees reconcile with those identified on the housing allocation boundary red line plan and the submitted Site Plan Framework Plan prepared by Land & Partners Ltd;
- Criterion g) should be amended to provide flexibility to allow for the removal of low, medium and higher amenity trees, where required, and their replacement as part of a proposed scheme; and
- Delete the requirement within criterion k) to provide or contribute towards off-site improvements to existing sports facilities.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Some of the changes sought under B4a above are simply to address what has previously been agreed with the Council as part of their consideration of application P/17/0998/OA. Other changes seek to clarify matters, request some flexibility within the wording of Policy HA1 (and

the Council's Framework Plan), make improvements and to rectify what appear to be errors or omissions made by the Council. The changes requested would make Policy HA1 and Figure 4.1: Policy HA1 indicative Framework Plan (and the Local Plan) sound.

B4c Your suggested revised wording of any policy or text:

Policy HA1

d)and east-west corridors **to be determined as part of individual applications.**

g) Existing trees subject to a Tree Preservation Order should be retained and incorporated within the design and layout of proposals, unless the removal of low, medium and higher amenity trees, where required, can be justified and their replacement forms part of a proposed scheme;

k) delete ii. Off-site improvements to existing sports facilities

Figure 4.1 Policy HA1 Indicative Framework Plan

Amend Council's Framework Plan to address comments made under B4a above and to reflect the Site Plan Framework Plan prepared by Land & Partners Ltd for the residual land east of the track between Greenway Lane and Warsash Road.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing

Yes, I want to take part in a hearing session session Yes

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

It will be necessary to attend the examination and to assist the Inspector by expanding upon the changes being sought to Policy HA1 and Figure 4.1.

Keely, Lauren

From: Michael Knappett <[REDACTED]>
Sent: 18 December 2020 15:40
To: Consultation; Planning Policy
Subject: Steven Richard Dunleavy SSAS on behalf of BJC Planning
Attachments: 2020.12.18 FBC Local Plan Reps.pdf

Dear Sir/Madam

Please find attached representations which the Council is requested to consider. These are submitted on behalf of Steven Richard Dunleavy SSAS and relate to Policy HA33.

Regards

Michael Knappett

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☒ Yes

☐ No

A2 Please provide your details below:

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Steven Richard Dunleavy SSAS
Address	c/o Agent
Postcode	
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	Mr
First Name	Michael
Last Name	Knappett
Job Title (where relevant)	Principal Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield Hampshire
Postcode	PO14 4DL
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

N/A

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

HA33 – Land east of Bye Road, Swanwick

B1c Which part of the Policies Map?

N/A

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Legally compliant There is no reason to believe the Plan has not met the legal requirements for plan making as set out by planning laws.

Complies with the duty to co-operate The onus is on Fareham Borough Council to demonstrate that the Plan complies with the duty to co-operate. It will have to provide evidence that it has engaged and worked effectively with neighbouring authorities and statutory bodies.

Sound Steven Richard Dunleavy SSAS considers that Policy HA33, as currently written, is sound.

Outline planning permission has been granted for 7 custom build dwellings under planning reference P/19/0061/VC. Pre-commencement planning conditions have been discharged and Ordinary Watercourse Consent has been obtained to discharge surface water to a watercourse. The landowner is currently trying to obtain an agreement with Hampshire County Council under s.278 of the Highways Act 1980 for works on the public highway.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

None

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

None

B4c Your suggested revised wording of any policy or text:

None

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ Yes, I want to take part in a hearing session

☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Keely, Lauren

From: Michael Knappett <[REDACTED]>
Sent: 18 December 2020 15:20
To: Consultation; Planning Policy
Subject: Publication Version of the Local Plan Representations - HA26 Beacon Bottom East
Attachments: 2020.12.17 FBC Local Plan Reps Form.pdf

Dear Sir/Madam

Please find attached representations which the Council is requested to consider. These are submitted on behalf of Southcott Homes (Fareham) Ltd and relate to Policy HA26.

Regards

Michael Knappett

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☒ Yes

☐ No

A2 Please provide your details below:

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Southcott Homes (Fareham) Ltd
Address	c/o Agent
Postcode	
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	Mr
First Name	Michael
Last Name	Knappett
Job Title (where relevant)	Principal Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield Hampshire
Postcode	PO14 4DL
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

N/A

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

HA26 – Beacon Bottom East

B1c Which part of the Policies Map?

N/A

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Legally compliant There is no reason to believe the Plan has not met the legal requirements for plan making as set out by planning laws.

Complies with the duty to co-operate The onus is on Fareham Borough Council to demonstrate that the Plan complies with the duty to co-operate. It will have to provide evidence that it has engaged and worked effectively with neighbouring authorities and statutory bodies.

Sound Southcott Homes (Fareham) Ltd considers that Policy HA26, as currently written, is unsound.

Southcott Homes (Fareham) Ltd has submitted a planning application for 9 dwellings at the site under planning reference P/19/1061/FP. This is described as 'Erection Of 9 Dwellings With Associated Parking And Access Following Demolition Of Outbuildings'.

The site has also been promoted to the Council through the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA). It has been given a SHELAA reference of 3180.

There is continued support for housing allocation HA26 and the site promoter is grateful that the Council has increased the indicative yield of the allocation to reconcile with the planning application and SHELAA submission of 9 dwellings, but there is an objection to some of the criteria within the policy.

The majority of the criteria and requirements of Policy HA26 are supported (a, b, c, e, f and g); however, criteria d and h, as currently written, are not justified nor effective.

The site is approximately 150m west of Beacon Bottom's junction with Botley Road. Beacon Bottom is a two-way single carriageway road which serves a predominantly residential area. It is approximately 4.8m wide in the vicinity of the site and is subject to a speed limit of 30mph. To the east access is provided to Botley Road, and to the west access is provided to a number of residential areas where the road narrows.

There is no footway on the northern side of Beacon Bottom and only a narrow pavement on the southern side outside the site. There is not sufficient space within the existing carriageway to provide a pedestrian/cycle link. This new policy requirement under criterion d) is, therefore, not justified nor effective.

Criterion h) is also objectionable and is currently misleading. A development proposal for fewer than 10 dwellings and on a site measuring less than 0.5 hectares would not normally have to provide any of the financial contributions listed, although a contribution to mitigate the impact of a development on the Solent Special Protection Areas would be required for a scheme of any size in line with Policy NE3. Only Policy NE3 is listed in the wording of the policy.

It is not considered that the scheme for 9 dwellings results in a requirement for any infrastructure provision or contributions, with the one exception outlined in the above paragraph.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

- Delete criterion d)
- Amend criterion h) to make clear that the contributions listed may only be required for any scheme proposing 10 or more dwellings (or a site area of 0.5 hectares or more). A contribution towards the cost of measures to mitigate the impact of a development on the Solent Special Protection Areas would be required for a scheme of any size and should be added to the policy.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Some of the changes sought under B4a above are simply to address what has previously been agreed with the Council as part of their consideration of application P/19/1061/FP. Other changes seek to delete a requirement which is plainly absurd and, in the case of criterion h), to clarify when contributions can legitimately be required.

B4c Your suggested revised wording of any policy or text:

Criterion d) delete

Criterion h) amend to say:

Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4, unless a scheme for fewer than 10 dwellings (or the site area is 0.49 hectares or less) is submitted. A contribution towards the cost of measures to mitigate the impact of a development on the Solent Special Protection Areas shall be provided in line with Policy NE3

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- ☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

It will be necessary to attend the examination and to assist the Inspector by expanding upon the changes being sought to Policy HA26.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Keely, Lauren

From: Consultation
Sent: 17 December 2020 15:36
To: Planning Policy
Subject: FW: Comments on FBLP Review - focusing on policy DS1 d)
Attachments: 2020.12.17- completed FBC Local Plan Reps Form re DS1 d) .pdf; 2020.12.17 BJC submission comments on Policy DS1 d).pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Chris Ward <[REDACTED]>
Sent: 17 December 2020 10:32
To: Consultation <Consultation@fareham.gov.uk>
Subject: Comments on FBLP Review - focusing on policy DS1 d)

Dear Sirs

Please find attached comments in response to the latest consultation.

If any of these are not clear, please seek clarification via this e mail.

Regards

Chris ward

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mr
First Name	Chris
Last Name	Ward
Job Title (where relevant)	Planning Consultant
Organisation (where relevant)	BJC Planning
Address	3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	See above
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☒ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☒ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Chapter 3

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy DS1 : Development in the Countryside.

B1c Which part of the Policies Map?

Those relevant to DS1 d)

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see attached document – BJC Reps re policy DS1 d)

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

The revision of Policy DS1 (d) as suggested in the attached document. And amended as set out below (B4c).

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would go some way towards recognising the wider need for education facilities, as required by the NPPF, albeit potentially short of meeting the requirement to plan positively for the provision of community needs as per paragraph 92.

B4c Your suggested revised wording of any policy or text:

New wording to say:-

d) is for a new or replacement building, conversion and/or extension either within an existing education facility or on a new site if suitable alternative sites cannot reasonably be accommodated within the urban area. Such facilities should not result in the loss of playing fields and/or sports pitches unless it can be demonstrated that these facilities are no longer required or they can be adequately replaced elsewhere on site.

The policy should not refer to sites on the Policies map unless all school/education sites are shown.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

i) To explain, if necessary, the current need for new education facilities by at least one provider who has a waiting list for places including places requested by the Local education Authority and whose students include those with a need for a non-urban location.

ii) to explain, if necessary, the current lottery in terms of when educational contributions might or might not be required and the lack of clarity in when that may arise and what facilities may or may not be provided by such contributions.

This may change depending on the response of the LPA to these suggestions.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Comments on FBLP Review with regard to Education Provision and Policy DS1

These comments set out in brief detail why it is considered that the Plan is **not sound** and **fails in its duty to co-operate** with other local authorities (specifically Hampshire County Council) as education authority.

1. The Plan is not sound.

- 1.1 For the Plan to be sound it needs to comply at least broadly with Government advice and specifically with Policy as set out in the NPPF.
- 1.2 Chapter 8 of the NPPF addresses the correct approach to promoting healthy and safe communities, with paragraph 92 advising on the correct approach to a broad range of community services and needs, and paragraph 94 specific advice about education/school places. The Plan fails to follow this advice in a broad sense, as a potential result of which Policy DS1 (specifically d)) is flawed and inadequate.

In a broad sense

- 1.3 Whilst chapter 3 of the Plan sets out the approach to identifying housing and employment needs, and the consideration to issues such as climate change, and transport, no consideration appears to have been given to assessing the future education (or health) needs of the borough, either as they currently exist or as these will change as new development (as proposed in the Plan) comes forward. It is noted that some allocations refer to the need for possible educational contributions, but these are not quantified, and no guidance is provided on how these needs will be met.
- 1.4 It is now common for many appeals relating to medium/large housing sites to seek a contribution to new educational facilities, but rare for details to be available of what facilities are needed and how these needs may be met/ a contribution used to assist. These details should be set out in the Plan, setting out how current needs will be met, plus the additional needs that will arise from new development (as proposed in the Plan)

Specific concerns re Policy DS1 d)

- 1.5 There is a known need for new school places for children with special educational needs, which cannot be met in mainstream schools, and for which HCC as education provider seeks to locate children with these needs into schools run by other providers. There is currently a waiting list for such places, meaning that some children are unable to be placed as required. The Plan does not recognise this need or make adequate/any provision for new provision to be made.
- 1.6 Many existing school sites within the urban area are already at or close to capacity, with limited or no space for extension. New sites for schools are difficult to locate within an existing urban area, especially if these will also need new playing fields to complement classroom facilities, unless specific sites are identified in a local plan. No sites are identified.
- 1.7 New schools may need to be located on the edge of an urban area, in the countryside, and some special needs are best provided on sites more remote from busy urban areas. This is not permitted by the Plan.
- 1.8 Policy DS1 d) only allows for the extension of educational facilities within existing school sites, where land may already be very limited. It does not allow for any new educational provision outside of the urban area. Hence the Plan not only fails to provide sites for an existing identified need, but also to allow for new sites to come forward, outside the urban

area, to meet future needs. BJC Planning represents one client urgently seeking new school facilities.

1.9 This lack of positive provision, and the restrictive nature of DS1, fails to satisfy the policy requirements set out in para 94 of the NPPF, specifically:-

- fails to ensure a choice of school places,
- fails to meet the existing educational needs, or to plan for future needs,
- fails to give any weight to the need to create new schools,
- fails to set out how the LPA has worked with HCC and other providers to identify needs and to ensure that these are provided.

1.10 It is noted that the Policies Map does not show all existing educational facilities facilities, so either all facilities need to be shown, or the reference to this deleted.

Changes needed to DS1 d)

1.11 As a minimum the Policy needs to recognise that new schools/educational facilities may be necessary that cannot be accommodated on existing school sites, and to allow for such facilities in the countryside, where a need can be demonstrated. This might be achieved by:-

-adding the word “either” after ‘extension’ and before ‘within’ and “ or on a new site if suitable alternative sites cannot reasonably be accommodated within the urban area Such facilities should” after ‘educational facility.

- Delete reference to sites identified on the Policies Map.

2. **Duty to co-operate.**

2.1 The Plan sets out in chapter 3 the discussions with other authorities to address housing and employment needs, but there is no indication of any collaborative working with the education authority (HCC) or indeed other service providers (such as health) to identify existing needs, the need likely to arise as a result of other proposed developments (specifically housing) or to include provision for this within the Plan (or elsewhere).

2.2 This lack of collaboration is currently evident in the difficulties set out in para 1.4 above, and needs to be improved so as to provide certainty to developers (and to planning officers considering an application) about what the educational needs arising from any development might be, how these are to be quantified, or what additional provision, or contribution, is justified to meet that need. In the absence of such details, and co-operation between the LPA and the education provider, there is no clarity for developers, and no certainty for the LPA that these needs will be addressed.

2.3 Given that the Plan identifies where all new housing (and employment) will be located, there is no reason that it should not also include details of any future education provision necessary to meet these needs, and policies setting out how these needs might be met. This should include not only mainstream education, but also special educational needs.

Keely, Lauren

From: Consultation
Sent: 18 December 2020 09:48
To: Planning Policy
Subject: BJC Planning reg 19 consultation response
Attachments: 2020.12.17 FBC LP Reps HP1 & HP9 Swanwick.pdf; 2020.12.17 FBC LP Reps HP1 & HP9 Plan.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Jezeph [REDACTED]
Sent: 17 December 2020 21:06
To: Consultation <Consultation@fareham.gov.uk>
Subject: Representations to the Reg 19 Plan

Dear Sir/Madam

Please find attached a representation to the Regulation 19 Local Plan

Kind regards

Caroline J Jezeph BA BTP MRTPI
Director

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mr
First Name	Bryan
Last Name	Jezeph
Job Title (where relevant)	Director/Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	N/A
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Inclusion of land east of HA33 in the settlement boundary or as an allocation

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- ☐ Yes, I want to take part in a hearing session ☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

POLICY H1 SETTLEMENT BOUNDARY OR ALLOCATION AND POLICY HP9 SELF AND CUSTOM BUILD

This representation seeks the extension to the proposed settlement boundary or a new allocation at Swanwick as shown on the attached plan. The site adjoins the proposed allocation HA 33 in the emerging Local Plan 2037. Outline planning permission for 7 custom build dwellings under reference P/19/0061/VC has been granted on the allocated site.

The representation proposes the land to the east of allocation HA 33 Bye Road and to the south of Swanwick Lane and Walpole Lane, up to Glen Road to the east is included within the settlement boundary or identified as an allocation. This extension could facilitate further development on the extensive rear gardens. It would be well suited for a limited number of additional custom build plots.

The landowners immediately adjoining the allocated site (see Paragraph 5.77 of the Local Plan) have expressed their willingness to develop some of their land. Furthermore, it is anticipated that the access road to be constructed on the custom build site could potentially be extended to serve adjoining land to the east. This would avoid the need for potential additional access points between frontage dwellings on Swanwick Lane and Walpole Lane.

An extension to the settlement boundary or an allocation would facilitate much-needed additional housing.

Policy HP9 is seeking a significant increase in the provision of self and custom build plots. The Policy is seeking 10% on sites over 40 units. As many of the sites that could contribute to the provision have already been granted planning permission and therefore, will not meet this requirement, it is desirable to make specific provision to meet the deficit. The proposed extension could provide more custom build housing to meet the Council's Policy requirements under the emerging Plan.



Location Plan x Land East of Bye Road x Lower Swanwick x

Keely, Lauren

From: Consultation
Sent: 18 December 2020 10:16
To: Planning Policy
Subject: BJC Planning response x4
Attachments: 2020.12.17 FBC LP Reps Policy H1.pdf; 2020.12.17 FBC LP Reps Policy HP2.pdf; 2020.12.17 FBC LP Reps Policy HP4.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Jezeph [REDACTED]
Sent: 17 December 2020 21:06
To: Consultation <Consultation@fareham.gov.uk>
Subject: Representations to the Reg 19 Plan

Dear Sir/Madam

Please find attached 3 representations in respect of the Regulation 19 Local Plan.

Kind regards

Caroline J Jezeph BA BTP MRTPI
Director

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mrs
First Name	Caroline
Last Name	Jezeph
Job Title (where relevant)	Director/Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	N/A
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Address the issue of revised housing figures

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Plan needs to be up to date

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- ☐ Yes, I want to take part in a hearing session ☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Policy H1 Housing Provision

The Secretary of State for Housing Communities and Local Government, Robert Jenrick, announced on 16th December that the Government had abandoned the algorithm that would have dramatically increased house building in many southern English Districts. Fareham Borough's housing requirement fell as a result of this algorithm and this Pre-Submission consultation plans for fewer new dwellings than earlier versions of the Plan.

The impact upon this emerging plan of changing the method of calculating the housing requirement is not known. It is noted that the Plan provides a buffer in its housing calculations but whether this is sufficient remains to be seen. It is understood that a new method of calculating housing requirements is to be published returning to dependency upon 2017 housing figures. If this is the case then Fareham Borough may need to find more housing land again.

In the light of this uncertainty two days before the closure of the consultation it seems that the Council will need to review the position and if significant changes are required the Plan will need to be republished for comment.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mrs
First Name	Caroline
Last Name	Jezeph
Job Title (where relevant)	Director/Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	N/A
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

HP 2 New Small-scale Development Outside Defined Urban Areas

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

See comments below in support

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- | | | | |
|--------------------------|---|-------------------------------------|--|
| <input type="checkbox"/> | Yes, I want to take part in a hearing session | <input checked="" type="checkbox"/> | No, I don't want to take part in a hearing session |
|--------------------------|---|-------------------------------------|--|

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Policy HP2 New Small-scale Development Outside Defined Urban Areas

This policy is supported because it facilitates the release of small development sites well related to the existing urban areas.

This policy provides greater flexibility than Policy DSP6 of the adopted Part 2 Local Plan which made provision for some residential infilling. That policy restricted infilling to no more than two dwellings and on the frontage sites only. The new approach is more pragmatic allowing for a more efficient use of sites which can contribute to housing provision without significant incursion into existing countryside.

The importance of the provision of small sites is underlined in the National Planning Policy Framework in paragraphs 67-71. Specifically, paragraph 68 states *inter alia*

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly...

This paragraph also supports the development of windfall sites.

The provisions of Policy HP2 will facilitate infill development making a contribution to windfall development within the Borough. Indeed, Policy H1 Housing Provision identifies 1224 homes to be delivered through unexpected (windfall development).

The anticipated delivery of windfall sites is informed by the background paper 'Housing Windfall Projections which anticipates an average of 51 sites per year from small sites of 1-4 dwellings, providing a total of 612 dwellings over the plan period. This background paper specifically identifies Policy HP2 as supporting windfall sites through infilling development.

A further advantage of facilitating the release of small sites is that these can usually be delivered relatively quickly. The NPPF identifies this advantage in the extract from paragraph 68 above.

The criteria for implementing this policy are relatively clearly set out, but will always necessitate a degree of interpretation. The amplifying text at paragraph 5.16 seeks to provide guidance on the Council's assessment of sustainability.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mrs
First Name	Caroline
Last Name	Jezeph
Job Title (where relevant)	Director/Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	N/A
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☒ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

5.26

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

HP4 Five Year Housing Land Supply

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

See comments below

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- | | | | |
|--------------------------|---|-------------------------------------|--|
| <input type="checkbox"/> | Yes, I want to take part in a hearing session | <input checked="" type="checkbox"/> | No, I don't want to take part in a hearing session |
|--------------------------|---|-------------------------------------|--|

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

Policy HP4 Five Year Housing Land Supply

The policy is supported in principle, but the issue of sustainability could be more fully addressed.

This policy recognises the importance of making provision for development in the event that planned sites do not come forward to the extent that the five-year housing land supply cannot be met.

A similar policy exists in the adopted Part 2 Local Plan which is Policy DSP 40. The new policy is very similar but has amplified criterion c) relating to landscape character and setting of the settlement.

The policy seeks to ensure that sites subject to this policy are sustainably located (criterion b). Sub paragraph 5.26 includes the wording;

The criteria provides a basis to ensure that any proposals coming forward outside the urban area is developed in a sustainable manner, in line with the principles of paragraph 11 of the NPPF.

It is noted that although this policy seeks to address the provision of sustainable development where there is no five-year housing land supply, in line with paragraph 11 the NPPF, there is no attempt to provide guidance on an assessment of sustainability. This contrasts with the attempt to provide such guidance in Policy HP2 where sub-paragraph 5.16 provides limited guidance.

Keely, Lauren

From: Consultation
Sent: 18 December 2020 10:17
To: Planning Policy
Subject: BJC Planning response x5
Attachments: 2020.12.17 FBC LP Reps H1 Burrridge.pdf; 2020.12.17 FBC LP Reps Burrige Allocation Plan.pdf; 2020.12.17 FBC LP Reps Burrridge Urban By.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Jezeph [REDACTED]
Sent: 17 December 2020 21:16
To: Consultation <Consultation@fareham.gov.uk>
Subject: Representations to the Reg 19 Plan

Dear Sir/Madam

Please find attached a representation in respect of the Regulation 19 Local Plan.

Kind regards

Caroline J Jezeph BA BTP MRTPI
Director

The office is currently closed to visitors but please email or telephone. At BJC Planning we have remote access to our office systems including the telephone system.

BJC Planning is the trading name of Bryan Jezeph Consultancy Ltd; Registered in England and Wales No.306 5949; Registered Office: The Gallery, 3 South Street, Titchfield, Hampshire PO14 4DL. Tel. 01329 842668 Web. www.bjcplanning.co.uk

This message is intended for the specified recipient only. If you are not the specified recipient, please delete this message immediately and disregard its contents.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title	Mr
First Name	Bryan
Last Name	Jezeph
Job Title (where relevant)	Director/Planner
Organisation (where relevant)	BJC Planning
Address	The Gallery, 3 South Street, Titchfield
Postcode	PO14 4DL
Telephone Number	
Email Address	

A3 Please provide the Agent's details (if applicable):

Title	N/A
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone Number	
Email Address	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan. You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- ☐ A paragraph Go to B1a
- ☒ A policy Go to B1b
- ☐ The policies map Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Allocate land to the west of Botley Road Burrige

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

- ☐ Yes, I want to take part in a hearing session ☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

LAND WEST OF BOTLEY ROAD, BURRIDGE

1.0 Introduction

- 1.1 This representation is made on behalf of the landowners of land described as land west of Botley Road, Burrige as shown edged red on the accompanying plan. The representation addresses the promotion of the site which is shown within the defined countryside of the proposed Local Plan.
- 1.2 The site comprises a gross site area of approximately 36.5 hectares. The area is capable of making a substantial contribution towards the housing requirements of the Borough. The site is large enough to create sustainable settlement with a range of facilities including a local centre with shops, a community facility and possibly a primary school. It can therefore support the existing community which lacks these amenities.
- 1.3 The site comprises extensive area of abandoned horticultural holdings. Most of the land is unused and not commercially active and, consequently, it has a very limited beneficial use.
- 1.4 The site should be included as an allocation and the urban area boundary extended to include the existing housing on the frontages of Botley Road and Swanwick Lane.

2.0 Policy H1

- 2.1 It is noted that following the statement of the Secretary of State for Housing Communities and Local Government, Robert Jenrick, on 16th December it is likely that the housing numbers set out in Policy H1 will need to be reviewed. The abandonment of the algorithm for calculating housing requirements is likely to be replaced by a new method drawing on the 2017 housing figures.
- 2.2 If these changes necessitate a reassessment of housing figures for the Borough this site provides an excellent opportunity for accommodating a new development in this part of the Borough

3.0 Site Description and Characteristics

- 3.1 This site comprises approximately 36.5 hectares. Most of the land owners have agreed to the joint promotion of their land since 2005. The development area excludes the frontage properties on Swanwick Lane and Botley Road. Most of the land owners live in properties on the frontage or within the proposed development area.
- 3.2 It is proposed that a very sustainable development could be created on the land. It is estimated that approximately 350-400 dwellings could be accommodated. This level of housing would take into account the desirability of retaining much of the existing woodland.
- 3.3 This is an area of land comprising mainly disused glasshouses and former strawberry fields. This site takes the form and character of open fields with trees and hedges on the boundaries. The land has limited beneficial use. Most of the former strawberry holdings have fallen into disuse. Former farm buildings are used for a range of uses including commercial storage.

- 3.4 There are trees on the higher areas which can be retained as a feature of the open space provision. These could form the basis of new woodland areas. This can provide significant screening.
- 3.5 Access can be provided from a number of points. The main access is proposed from Botley Road with secondary access or emergency access from Swanwick Lane and Green Lane. Pedestrian access could be provided to New Road.
- 3.6 The land is in the designated countryside but it is not covered by any other designations although it does adjoin a SINC known as the Swanwick Lakes Nature Reserve. The development of the area would not raise any issues for the Reserve.
- 3.7 The land is close to the National Air Traffic Control Centre (NATS centre) where up to 700 people are employed. This Centre is within walking distance of most of the site.
- 3.8 Although it is separated from Whiteley development area by Botley Road, there are footpaths and cycle paths that lead directly into the Whiteley District Centre. These footpaths are just 500 metres from the District Centre which includes a large Tesco Superstore, Marks and Spencers, Next and a cinema complex.
- 3.9 There is vehicular access to Whiteley from Botley Road via Yew Tree Drive. Buses from Park Gate and Botley can also gain access via Yew Tree Drive.
- 3.10 The proposed level of development would be capable of sustaining a new bus service. The proposed development area could support its own facilities in the course of its development including some local shops and a community facility. In the short term, the primary schools in Whiteley are accessible on foot, by bike and by the bus link at Yew Tree Drive.
- 3.11 This site which lies north of the M27 Motorway can offer access to both the north to Botley and Bishops Waltham and beyond and also to the areas to the south. This would ensure that traffic can be distributed around the main highway network.

4.0 Analysis of the Site

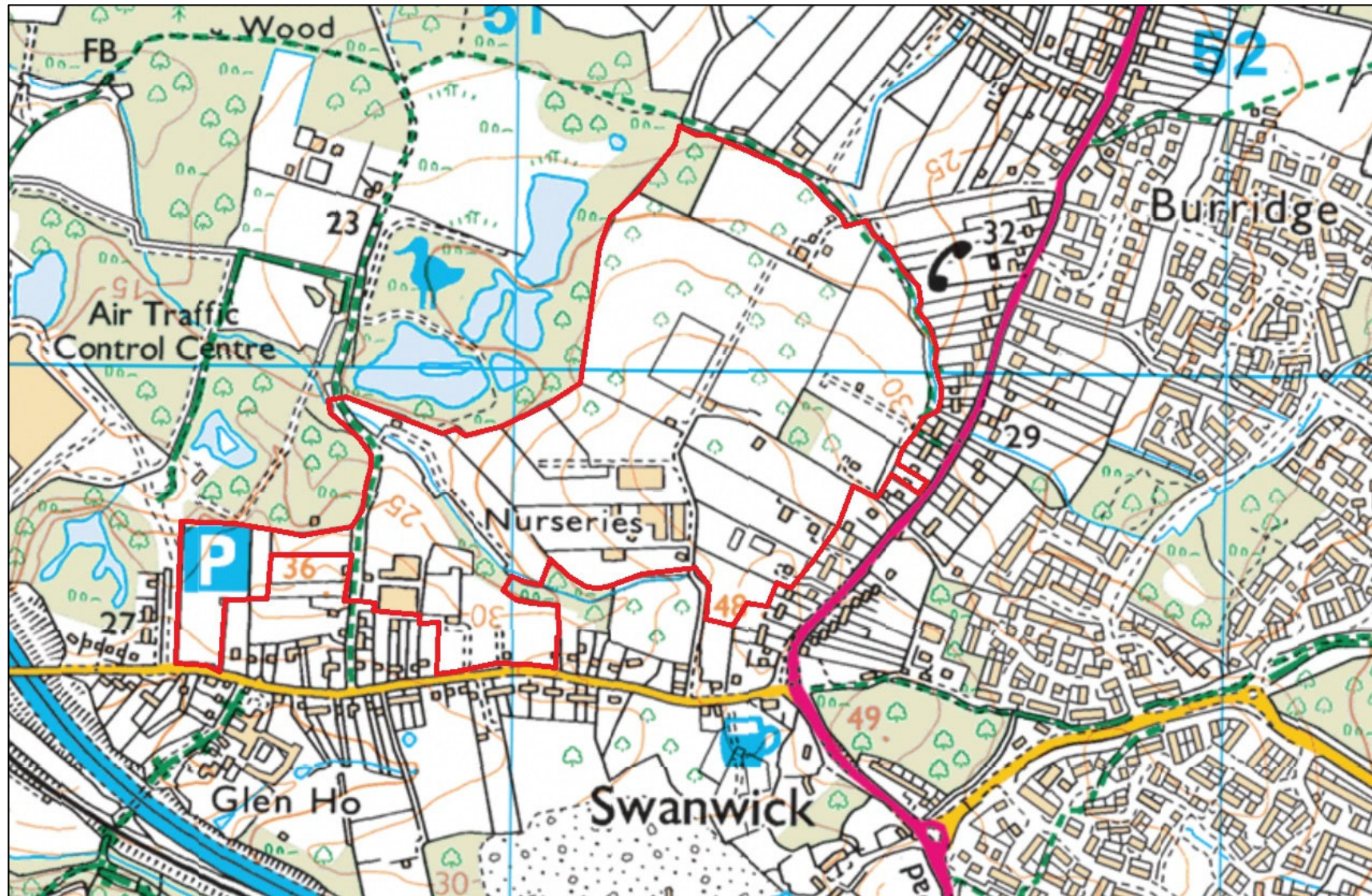
- 4.1 The agricultural land classification confirms that 20% is in Grade 4 while 63% is in Grade 3. None of the land is in Grade 1.
- 4.2 The land is wholly within Flood Zone 1 and that there are no flood issues.
- 4.3 The site is not used by Brent Geese or Waders.
- 4.4 The site adjoins a SINC. It is recognised that it is essential to undertake ecological surveys.
- 4.5 The site can access the surrounding highway network from three directions north and south on Botley Road and south via Swanwick Lane.

- 4.6 Much of the land is screened by woodland and the surrounding residential development which lines both Botley Road and Swanwick Lane. Only the central part is higher than the surroundings. The evidence of the previous use for strawberry growing can be seen from the remaining plastic coverings and metal rings that were used to protect the strawberries. It is desirable to clear this land. The disused horticultural holdings were abandoned many years ago.
- 4.7 The site is available and deliverable in the plan period.

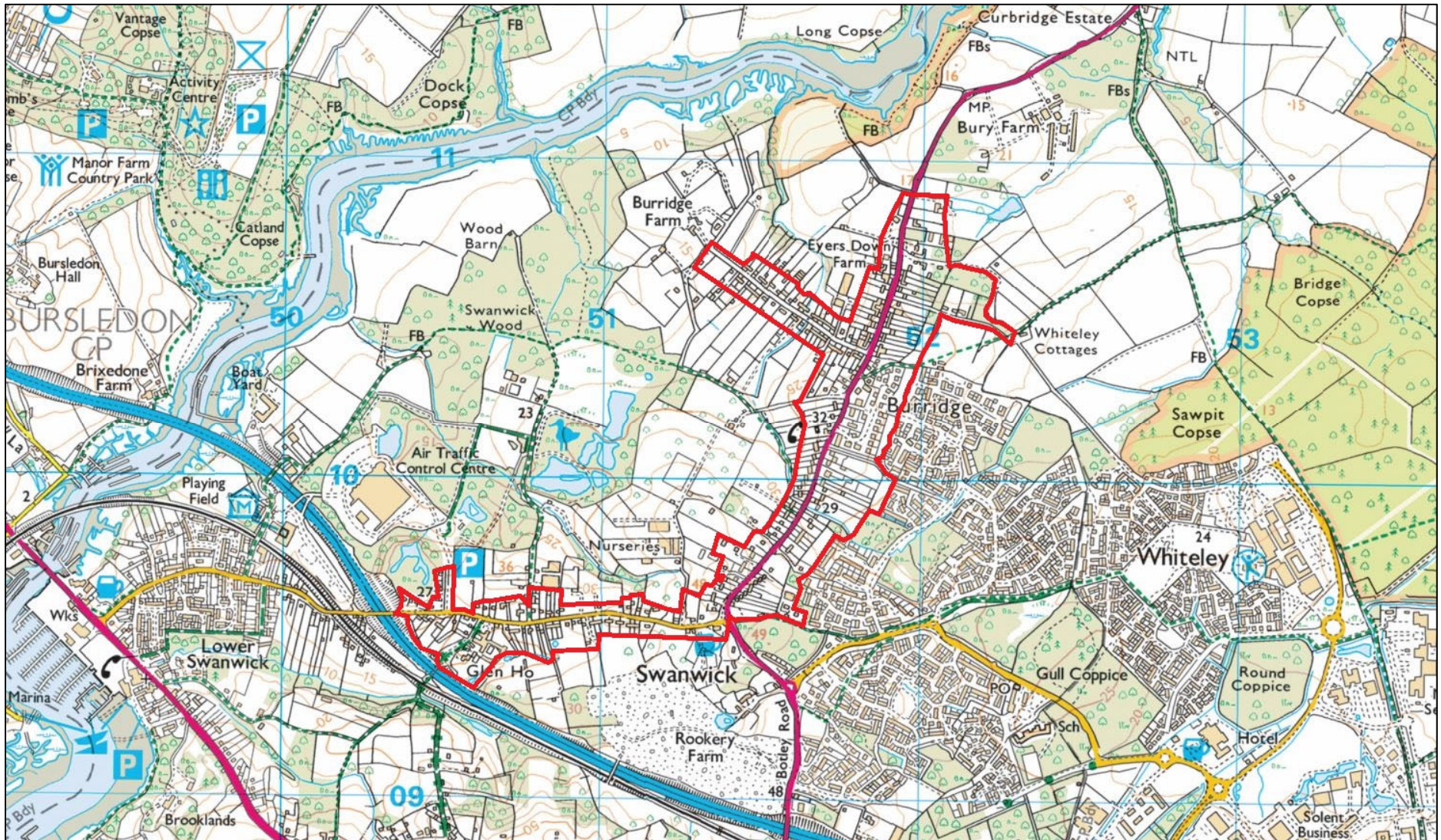
5.0 Conclusion

- 5.1 The above analysis demonstrates that there are no overriding constraints.
- 5.2 The site could make a significant contribution to the Borough's Housing Requirement.

Land at Botley Road, Burridge – Location Plan



Burridge - Proposed Settlement Boundary Plan



Respondent details:

Title:	mrs
First Name:	katarzyna
Last Name:	bond
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: LOCAL PLAN 2037 BOUNDARY (HP3, HP5-9, HP11, NE2, NE7, TIN4, D4)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

it has been commented on in previous consultation and none of the omments were taken on board which defets purpose of the consultation.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

review of quality of housing proposed and better sounds climate chnage policies

How would the modification(s) you propose make the Local Plan legally compliant or sound?

propose on site facilities, avoiding using local infrustruture for bigger developments

Your suggested revised wording of any policy or text:

rethink climate emergency strategy: look at Southanpton City Council Green Charter and Wincehster City Counincil green policies

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Gordon
Last Name:	Bonney
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The outline planning permission granted on site HA32 is currently subject to the beginning of a judicial review as the site is not considered deliverable and therefore should not be included in the housing allocation

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 from the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Removing a site of only 8 houses with an unlawful planning permission will make the Local plan more sound & legally compliant

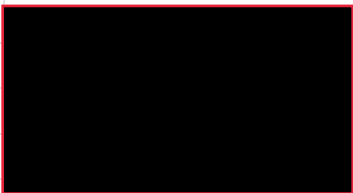
Your suggested revised wording of any policy or text:

Remove HA32 from the plan

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Ms
First Name:	C
Last Name:	Borrow
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: HOUSING ALLOCATIONS (HA1, HA3-4, HA7, HA9-10, HA12-13, HA15, HA17, HA19, HA22-24, HA26-44)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Now that the Planning Application P/20/0912/OA has been rejected for a second time that the land to the East of Downend Road be removed from Fareham's Local Plan.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the land to the East of Downend Road from Fareham's Local Plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Removing the land to the East of Downend Road from Fareham's Local Plan would reflect the rejection of planning permission. This area is unsuitable for development unless the railway bridge is rebuilt which is not financially viable.

Your suggested revised wording of any policy or text:

Removal of the land to the East of Downend Road from Fareham's Local Plan.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:

Ms

First Name:

SUSAN

Last Name:

BOYCE

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:



A3 Please provide the Agent's details (if applicable):

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:

~~IN
A~~

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|---|-----------|
| <input checked="" type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

SEVERAL

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

SEVERAL

B1c Which part of the Policies Map?

UNABLE TO ACCESS AT HOME. FAREHAM / STUBBINGTON STRATEGIC GAP AREA.

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

IT WOULD APPEAR TO ME, ESSENTIAL CRITERIA & EVIDENCE BASED FACTS 'HAVE BEEN OMITTED', THIS RENDERING PART OF THIS PLAN OUTDATED ALREADY, (AFTER ALL WE ARE IN 2020 - APPROACHING 2021) AND NOT COMPLIANT WITH THE ABOVE 3 POINTS IN ENTIRETY.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

TO INCLUDE THE OMITTED ESSENTIAL CRITERIA
AND EVIDENCE BASED FACTS.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

I BELIEVE IT WOULD BY:

- 1) MINIMISING RISKS .THUS AVOIDING DEVASTATION .
- 2) PREVENTING POTENTIAL LEGAL ACTIONS AGAINST THE COUNCIL
THUS AVOIDING WASTING TAXPAYERS MONIES .
- 3) PROTECTING a) RESIDENTS . b) THE ENVIRONMENT . c) THE COUNCIL

B4c Your suggested revised wording of any policy or text: d) THE COUNTRY SIDE & ALL WITHIN IT.

TO INCLUDE THE OMITTED ESSENTIAL CRITERIA
AND EVIDENCE BASED FACTS.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

BECAUSE OF THE SERIOUSNESS OF THE OMISSIONS
AND EVIDENCE-BASED FACTS WHICH I WOULD
NEED TO CONVEY TO THE PLANNING INSPECTOR.
THUS UPDATING THE PLAN TO BE IN LINE WITH
MODERN TIMES.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FINALLY IF AN 11yr OLD CHILD HAS BEEN
ALLOWED TO ADDRESS THE PLANNING INSPECTOR
DIRECTLY, THEN SO SHOULD I.
Yours Sincerely.

◆

9

5

•

•

•

4

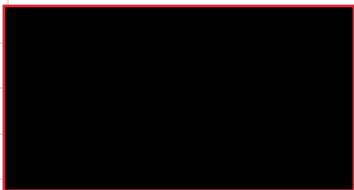
1

•

●

•

Respondent details:

Title:	Mr
First Name:	Robert
Last Name:	Braddock
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The number of houses planned for the Warsash/Locks Heath area is completely unacceptable. After plundering the local area for housing supply over the past 5 years there seems an appetite to continue. The amenities and infrastructure currently in place is completely unsuitable for the number of houses currently in the area let alone any more. In addition, despite a vain attempt to mitigate the nitrates issue by rezoning land on the Isle of Wight (?) this is completely unsuitable to resolve the issue in our local area. Frankly, it's a disgrace.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

No more houses in Warsash and Locks Heath - and resolve the nitrates issues by this route

How would the modification(s) you propose make the Local Plan legally compliant or sound?

As above

Your suggested revised wording of any policy or text:

Not applicable

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: annemarie.brierley1 <annemarie.brierley1@gmail.com>
Sent: 18 December 2020 10:04
To: Consultation
Subject: Local plan comments.

Name. Anne Brierley



Consultation on the local plan.
Comments on the local plan to 2037.

Firstly I would like to say that the deliverys of The Special addition of Fareham Today were not made to all areas. This led to a big delay in copies arriving and lost time in trying to understand or access the information given.. Not all people know how to use or have the technology to take part in this survey. By having to reply in the ways set out, is also off putting and in this remark i include myself. I would hope that this is still forwarded . I found also that when replying to the, Have Your Say On Our Future Development questionnaire, that there was not really any choice for development areas. Given the way the questionnaire was written it was no surprise to find that people wanted the development put at the outer edges of existing developments even if that ment using our country side.

HA4 Downend Road.

Ever since the 2017 draft plan was drawn up, the residents of the local area have had to constantly defend their rights and position on this.

Land WEST of Downend Road is not in the plan at the moment but it's only a matter of time before we will be defending this area too.

It is known that surveys have taken place and a wild life survey has continued all this year.

Several developers have been lining up, including the developers trying to get permission on land east of Downend Road. (Winnham Farm)

Housing Alocation

HA4

land east of Downend Road

Known as Winnham Farm.

First planning number P/18/0005/OA was DEFERRED and then DENIED over concerns with traffic and road safety at narrow bridge on Downend Road.

Went to appeal. App/A1720/w/19/3230015 Hearing on 23 to 25 September. Which was DISMISSED by the Inspector.

Resubmitted as number P/20/0912/OA DENIED again ON 18TH DEC 2020.

This area should of never been placed as a development site. The developers themselves knew of traffic problems from the start.

It went to the local plan that was never finalised 2017.

The council have left this area in the current plan and have never had any other intention but to keep it in, despite the area suffering SEVERE traffic congestion with many roads at a stand still. (Pre covid)
When the problems with Covid subside we will be back to square one.

Residents have very little faith in the traffic modelling, desk top surveys and transport assessments as they don't compare with reality.

Areas affected by SEVERE traffic congestion are:

M27 motorway and its slip roads,

The Delme Roundabout and A32 into Gosport

Downend Road and all side roads that join it. (Are regularly used as rat runs.)

Residents of Cams Hill Road, St Catherine's way, The Ridge Way, Ventnor Way, Alum Way and The Causeway . ALL have NO other exit route other than onto Downend Road. The Thicket on the west side of Downend Road also suffers rat running.

The A27 between Portchester to the Delme roundabout and onwards

The junction where Downend Road meets A27 & Shearwater Ave.

Who would then allow more development on Downend Road with such restrictions as, a bottle neck narrowing highway, over a narrow brick built network rail bridge ?

Traffic also impacts on the environment, amenity, health and well being of residents.

Poor air quality which is known to be very high, with some residents having had a letter about this.

If it were not for this year's Covid 19 crisis reducing traffic numbers , we may have exceeded the limits.

If you walk along the A27 you can taste the fumes in the air.

Policy DSP40.

States that a planning proposal should not have unacceptable environmental, amenity, or traffic implications and plans should not create a bad relationship with the existing residential properties. I believe this continued application in this area fails the test on all counts.

Fareham council is breaking their own rules on policies.

Transport and other infrastructure.

Highways England, Hampshire County Council and Fareham Borough Council along with the Developers are all aware of how dire the situation is.

No spare capacity for new roads or spare capacity on the Delme roundabout.

The developers and HCC don't dispute this.

It is for this reason that the Developers are required to make a contribution to the Delme Roundabout and many other items too numerous to list.

The mitigation plans the developers and HCC have proposed will be at best a very temporary fix and will be negated by the increase in traffic from more people being attracted into the area. The predicted rise in vehicle ownership, regardless of engine type, and the enormous rise in home deliveries and all traffic from other areas that pass through. There are going to be disruptions with the Downend Road /A27 Junction, possibly being worked on twice. Once for mitigation work, and again for extra lane for Bus Rapid Transit.

If the development goes forward I believe we would all face years of disruption.

Sustainable and alternative modes of transport for new developments.

A good idea but current residents know that to live in this area you need transport.

The few remaining shops at Portchester and Fareham are unlikely to be walked to.

The distances to bus stops is greater than the ideal distance for walking.

Only three buses on the A27 near the Thicket with one of them only running on a Wednesday between 11 & 2pm.

This did come up with the Inspector at appeal and he was hesitant until he was informed that there was to be the Bus Rapid Transit system.

How many years before it arrives ? And do they have the money to fund it ?

Reporting we are getting one and it arriving are very different things. Look at all the delays with Welborne.

Walking and cycling are more likely to be for leisure given every day time restraints, but senior school children will probably walk to Cams school most days.

Developments that are promoting walking and cycling will still have the choice of a motor vehicle and at the Downend location I believe they will.

Sent from Samsung tablet.

Respondent details:

Title:	Mr
First Name:	Ashley
Last Name:	Brown
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: HOUSING ALLOCATIONS (HA1, HA3-4, HA7, HA9-10, HA12-13, HA15, HA17, HA19, HA22-24, HA26-44)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The area to the East of Downend Road is not suitable to be included in the local plan. The local road infrastructure is presently already congested. It often takes 15 minutes to exit The Causeway and turn right onto Downend Road at peak times. The additional 350 homes planned for the site will exacerbate this and the pollution levels on the A27 at Cams. I also believe the Ecological Report for the site to be untrue. This is a report commissioned and undertaken some 5 years ago, with a cursory desktop update. I have often observed Brent Geese on the neighbouring land to the West of Downend Road feeding and roosting in some numbers. I believe this also to be the case on the land East of Downend Road and this is contrary to Policy 7.1 and 7.2 W&BG 1, 2 et al in the Solent Waders and Brent Goose Strategy document.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the land to the East of Downend Road for development

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would preserve important local chalk down land and the Brent Goose population that inhabits it during winter months.

Your suggested revised wording of any policy or text:

Remove this area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	James
Last Name:	Wood
Job Title: (where relevant)	Chairman
Organisation: (where relevant)	Burridge and Swanwick Residents' Association
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA45 - Rear of 77 Burridge Road

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

1. We are making a representation on legal compliance regarding Policy HA45. FBC have not complied with the duty to consult as laid out in The Town and Country Planning (Local Planning) (England) Regulations 2012, Section 1.2 and in their own Statement of Community Involvement. They have not consulted on this matter directly with local residents and it is not in the spirit of being Open and Fair to expect individual residents to only find this information in the "Publication Plan". The Burrridge and Swanwick Residents' Association has recently conducted a survey of local residents and we have concluded the following: • When we advised them of Policy HA45 we were told by many residents that they were not aware of its existence. • It has not been mentioned in any copy of Fareham Today • It has not been included in any publicly available SHELAA and no attempt has been made to consult since it was added as Policy HA45 ref 3138 in July 2020, 3 months after consultation on the supplemental plan which did not include it either.

2. We are making a representation that Paragraph 5.99 fails the test of soundness. The Draft Local Plan 2017, Policy H10: Gypsies, Travellers and Travelling Showpeople stated that: The identified need for three additional gypsy and traveller pitches will be met through the extant permission for two additional pitches at The Retreat, Newgate Lane and through the provision of additional pitch(es) (subject to ecological surveys) at the existing site at Burrridge Road, Burrridge. The proposal in 5.99 of the 2020 Publication Plan now states that all 3 additional pitches will be at 77 Burrridge Road with no explanation for the change nor description as to why the other pitches are not available and what measures have been taken to secure the required pitches at other sites. In reviewing the background paper: The Settlement Boundary Review for the Fareham Local Plan 2036, during the LPP2 examination, both the Council and inspector in his report concluded "that Burrridge would not be appropriate to be included within the urban area as it is considered to constitute 'ribbon' development and does not contain essential services and facilities that you would expect from an established urban area." The same review gave a further reason for not including Burrridge in the DUSB: that to do so would allow for back land development, which is not desired as it detracts from ribbon development characteristic of the area. Policy H14 states that gypsy and traveller sites will be permitted where: the site has access to shops, schools, community and health facilities by sustainable modes of transport such as public transport, on foot or by cycle. As described in the previous paragraph, Burrridge Road does not meet this H14 criterion because it is outside the DUSB. Similarly, as a backland development, it is not appropriate outside the DUSB. The proposed site in Burrridge Road does not meet H14 and weakens the arguments against backland development elsewhere in Burrridge, which has been resisted strongly by FBC and local residents for many years.

3. We are making a representation that paragraph 5.100 fails the test of soundness. The proposal ignores the findings of the National Inspectors in reviewing appeals. In both the 2013 upheld appeal (APP/A1720/A/13/2191454) and 2019 appeal dismissal (APP/A1720/W/18/3209865) the inspector described larger development areas as likely to be damaging to the ecology which could not be adequately compensated for by Biodiversity Enhancement Measures.

4. We are making a representation that paragraph 5.101 fails the test of soundness. The siting of additional pitches in Burrridge Road, being a rural setting so close to private houses is clearly wrong as the history and findings of successive applications and appeals demonstrate. The proposal ignores the findings of FBC in rejecting the planning application of 2012 and of the National Inspectors in the findings of subsequent appeals. In 2012 Planning Application P/11/1063/CU for a single gypsy pitch was REFUSED by FBC because it was in a rural and unsustainable location and that it would detract from the rural character of the locality. When allowing the appeal In 2013 (APP/A1720/A/13/2191454) the inspector specifically restricted the development to 1 pitch with a small site area. In 2019 the appeal (APP/A1720/W/18/3209865) described tandem development as out of keeping with the local area. This site will impact on the character of the surrounding area. Whilst assurances have been made about who will live there and how the site will be looked after to a high standard, if the development is approved, FBC will have no subsequent control over who lives there and how it will be maintained in keeping with the local area. The proposal does not address onsite parking. There is none identified nor is there sufficient room to accommodate three additional families' vehicles and possibly works vehicles so Burrridge Road will be congested as a result. Local residents have already experienced parking difficulties due to vehicles associated with the one existing site being parked inconsiderately. The proposal does not address the issue that this site lies within the zone of influence of the Solent and Southampton Water Special Protection Area and Ramsar Site and the Solent Maritime Special Protection Area of Conservation. The site at its closest point is less than 500 metres from this protected area along the Hamble River and the Hamble River National Trust land. Having regard to the distance from these protected sites, the development would be likely to have a significant effect on the protected characteristics of these sites. James Wood Chairman, Burrridge and Swanwick Residents' Association

What modification(s) is necessary to make the Local Plan legally compliant or sound?

FBC have not consulted with the general public on Policy HA45 which is a legal requirement before inclusion in the Publication Plan 2037. In the draft plan Policy H10 is significantly different. FBC in there explanation in Paragraphs 5.99, 5.100 and 5.101 have not considered and presented on the aspects raised in our representation. Policy HA45 should be removed until all aspects of our representation have been addressed. A new policy and associated rationale can then be included proposing a different solution in a more suitable location.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

The general public will have been consulted and their responses considered by FBC. Inspectors' recommendations and restrictions as part of previous appeals will have been taken account of. These issues, as raised in our representation, will have been considered by FBC before consultation with the general public and as a result we would expect a different location to be proposed.

Your suggested revised wording of any policy or text:

Placement of the additional pitches in a different location which meets all the soundnespoints raised in our representation. For us to suggest any rewording is not applicable at this stage.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

This would only be necessary if representation from the Burr ridge and Swanwick community was considered essential to the examination. We would be willing to represent the views of the local residents.

Respondent details:

Title:	Mr
First Name:	Jason
Last Name:	Chambers
Organisation: (where relevant)	Chambers Properties Ltd

Agent details:

Title:	Mr
First Name:	Robert
Last Name:	Tutton
Job Title: (where relevant)	Director
Organisation: (where relevant)	Robert Tutton Town Planning Consultants Ltd
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 9.138

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Chambers Properties Ltd owns land to the north of Springfield Way in Stubbington that was the subject of planning application P/19/1295/FP because it would allegedly '...lead to the loss of existing open space' the subject of Core Strategy Policy CS21. While an 'Existing Open Space' notation (the subject of Policy NE10) is to continue to form part of the emergent Local Plan, yet another policy layer ('Local Green Space') is proposed, to be the subject of Policy NE11. Objection is raised to the inclusion of the land owned by Chambers Properties Ltd within the 'Mulberry Avenue Open Space'.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the land owned by Chambers Properties Ltd from the 'Mulberry Avenue Open Space.'

How would the modification(s) you propose make the Local Plan legally compliant or sound?

n/a

Your suggested revised wording of any policy or text:

n/a

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To oblige Fareham Borough Council to justify inclusion of private land at Springfield Way within the Mulberry Avenue Open Space.

Keely, Lauren

From: Consultation
Sent: 16 December 2020 16:38
To: Planning Policy
Subject: FW: Consultation response on behalf of Blackbrook Estates
Attachments: Blackbrook Estates Ltd reg 19 rep V2.pdf; Blackbrook Estates Ltd response form.pdf

Hi Lauren

I'm forwarding you the representations I mentioned in my email to you earlier.

Kind regards

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Steve Tapscott [REDACTED]
Sent: 14 December 2020 14:42
To: Consultation <Consultation@fareham.gov.uk>
Subject: Consultation response on behalf of Blackbrook Estates

Good afternoon,

Please find attached a completed response form and accompanying letter, sent on behalf of Blackbrook Estates Ltd.

Best wishes,

Steve Tapscott BA (Hons) MA MRTPI
Associate Director
Chapman Lily Planning Limited



Unit 5 Designer House, Sandford Lane, Wareham, BH20 4DY

Follow us on Twitter: @cl_planning, and Facebook: chapmanlilyplanning



We wish all of our clients and allied professionals a very Merry Christmas and a prosperous 2021.



Rather than send out Christmas cards, Chapman Lily Planning Limited has decided to make a charitable donation to #WillDoes, a fantastic charity which promotes any charitable purpose (including the promotion of education,

physical health, mental health and social inclusion) and contribute financially to charitable projects for the benefit of young people in Dorset and the surrounding areas. Introducing young people to sports and other activities to help them connect and engage socially, rather than retreat to more insular gaming and social media pastimes and to develop coping mechanisms to help manage anxiety and emotions, increase self-awareness, developing trust and relationships. For more information visit www.willdoes.co.uk



Planning Policy Team
Fareham Borough Council

By email:
consultation@fareham.gov.uk

Chapman Lily Planning Ltd
Unit 5 Designer House
Sandford Lane
Wareham
BH20 4DY

Date: 07th December 2020
Your reference: Fareham Local Plan 2037 (reg 19)
Our reference: JH-3100



Dear Sir or Madam,

Response to the draft Fareham Local Plan 2037 regulation 19 consultation

On behalf of my client, Blackbrook Estates Ltd, I herein provide a response to the above draft local plan consultation.

The plan will need to meet the tests of soundness, as set out in paragraph 35 of the National Planning Policy Framework (NPPF), namely that it is:

*'a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

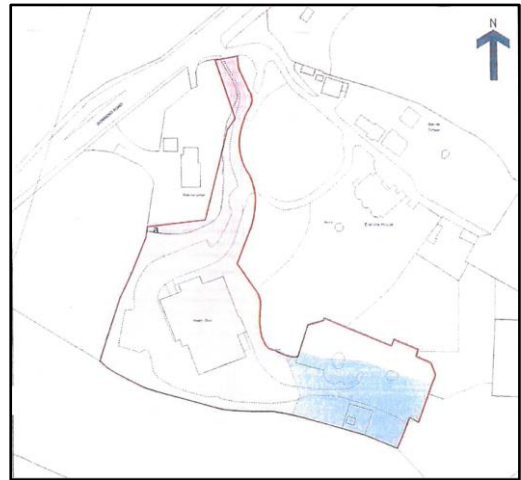
*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework'.*

This representation is structured with the above in mind and focusses on draft allocation ref. HA4 in respect of land at Downend Road East, Porchester.

By way of background, my client owns a parcel of land that includes 24/7 Fitness, whose boundary abuts the draft allocation at Downend Road East (see inset map). The site has a long established, existing use, which involves substantial traffic movements throughout the day including peak times, and is accessed to the north. Utilities and drainage infrastructure already serve the site. The landholding contains substantial hard surfacing and, at two storeys in height with a number of additional structures in the curtilage, it constitutes a significant brownfield site.



The access to the site is treelined and covered by a TPO. Just to the north of this is an area of trees and grassland recorded as an SSSI, adjacent to which is a waste transfer station. My client's site sits between the south and west of the allocation and these neighbouring features. This relationship is illustrated by the draft Policy HA4 framework plan excerpt in figure 1 below.



Figure 1: draft Policy HA4 framework plan excerpt (site location denoted by a red star)

Draft Policy HA4 contains a number of criteria for the proposed allocation to meet. Of particular interest to my client is:

'g. Proposals should ensure a buffer is designed to protect the SSSI at Downend Quarry and the creation and enhancement of ecological corridors...'

Quite understandably, given the position of their landholding relative to the proposed allocation, my client's fear is that their demise will be expected to play a role in the required mitigation or even provide enhancements. There is a danger that the Council will perceive my client's site as playing a role as a buffer between the SSSI and the waste transfer station, but it is clearly separate and has its own established use and is in third-party ownership.

As such, I would respectfully say that the responsibility for mitigation and enhancement lies solely with the developers of the allocation and my client would not wish to see their landholding compromised by being expected to play a role. Linking this back to the tests of soundness, a plan has to be deliverable in order to pass test c ('effective'). Therefore, any reliance on third-party land within my client's ownership would render Policy HA4 not deliverable and not sound.

I trust that the above will be considered and that any future mitigation and enhancements will be brought forward without any reliance on my client's landholding. I would be grateful if I could please be added to the Council's local plan contacts' database, so my client can be kept up-to-date with progress on this plan and future reviews.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'ST' or similar initials.

Steve Tapscott BA (Hons) MA MRTPI

Associate Director

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☒ Yes

☐ No

A2 Please provide your details below:

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Blackbrook Estates Ltd

Address:

C/o agent

Postcode:

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

Mr

First Name:

Steve

Last Name:

Tapscott

Job Title: (where relevant)

Associate Director

Organisation: (where relevant)

Chapman Lily Planning

Address:

Postcode:

Telephone Number:

Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

N/A

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session

☒

No, I don't want to take part in a hearing session


B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Respondent details:

Title:	Ms
First Name:	Pamela
Last Name:	Charlwood
Job Title: (where relevant)	Co Chair
Organisation: (where relevant)	Hill Head Residents' Association
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 4.2

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The lower number of houses required is based on a yet to be confirmed government change of mind. In parallel with that, there has been considerable debate nationally over the policy approach set out in the government's consultation which ended in October, with many MPs objecting. Other than the 847 contingency, we see no recognition of the uncertain ground upon which the current numbers in this plan are based. The Plan (para 3.20) implies that the so called Strategic Growth Area in South Fareham is discounted from this new version of the Plan but is that land still designated as such? If so, in the event of any substantial increase in the housing numbers currently assumed as a basis for the Plan, would that retained designation cause it to be immediately vulnerable?

What modification(s) is necessary to make the Local Plan legally compliant or sound?

More contingency plans should higher housing numbers be needed, together with transparency as to where they would be located.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would build in scope for national variation in housing numbers required so that the Local Plan was based on consultation which was valid even in the light of that variation

Your suggested revised wording of any policy or text:

I cannot suggest appropriate wording other than the approach have set out above, with a realistic margin of housing numbers, greater than is currently allowed for

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I speak on behalf of a substantial number of residents of Hill head and -particularly with the limitations set upon public consultation during the COVID period, I would welcome the opportunity to put formally the points I am raising

2) Paragraph: 4.9

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Para 4.9 (together with paras 1.17 and 1.18) declare the current Welborne plan 'fit for purpose' but evidence is needed: no information is given on funding and project dates for work to Junction 10 of the M27, which is an essential precursor to work commencing on Welborne. Far more confirmed detail is required before this can be accepted as credible.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Timescales and confirmed funding sources for Welborne, together with contingency plans in respect of annual housing numbers in the event of Welborne slipping further or failing altogether

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would render more robust and credible the housing numbers which are the basis of the Local Plan and would mean that contingency plans and their would be clearly set out and their implications would be transparent to local people

Your suggested revised wording of any policy or text:

See two paras above, please - with the numbers requested

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

See previous submission - I wish to speak on behalf of a substantial number of residents of Hill Head

3) Paragraph: 4.4

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Is Fareham now certain about the scale of any possible additional requirements likely to be received under our duty to cooperate with neighbouring authorities, principally Portsmouth and Gosport? We note (para 3.17) the joint approach which will be taken by PfSH to achieve a statement of common ground and the bilateral discussions with neighbouring authorities, but we see no reference to evidence set out in the CPRE Hampshire report showing the amount of brownfield land which could be considered as available in both Gosport and Portsmouth (CPRE report published 2 November 2020). That report estimated that in Portsmouth 119 hectares of brownfield land could be considered available and in Gosport 115.5 hectares. We also note the comments of the Prime Minister emphasising the priority which should be given to brownfield development before building on greenfield sites is considered. Whilst we recognise the importance of the Duty to Co-operate, we believe this should be on a basis that feels credible to local people.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

An approach which demonstrates to local people that neighbouring authorities are seriously assessing all brownfield site possibilities within their own areas before requesting assistance from Fareham Borough Council

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would demonstrate that FBC is not being asked to do more than its share to meet the national housing need

Your suggested revised wording of any policy or text:

Evidence of the response of Portsmouth CC's and Gosport BC's serious assessment of brownfield site potential

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

As stated in previous submissions -to speak on behalf of a substantial number of Hill Head residents

4) Policy: DS2 - Development in the Strategic Gaps

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Whilst we wholeheartedly support the policy regarding the Strategic Gaps D2 and paras 3.9 and 3.44) we note with concern the comments at 3.46 regarding the Fareham/Stubbington strategic gap and the caveat about its current boundaries. We urge FBC to adopt a coherent and transparent approach to land management, resisting erosion around the edge of current Strategic Gaps, together with a coherent and consistent approach to mitigation bids. In the area of Stubbington and Newgate Lane, this will be particularly important when the impact of the new bypass becomes evident in 2021/22.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Openness and clarity about what is really intended in respect of the boundaries of Strategic Gaps, together with a clear policy on use of land for 'mitigation'

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would provide detailed information which would clarify important issues - ie the boundaries of the Strategic Gaps - which is currently vague

Your suggested revised wording of any policy or text:

Para 3.46 must be clarified

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

As stated in previous submissions -to speak on behalf of a substantial number of residents of Hill Head

5) Policy: D4 - Water Quality and Resources

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Policy D4 on Water Quality and Resources and subsequent paragraphs do not address sufficiently the seriousness of the need to improve water quality: Southern Water is the worst performing water company regarding water quality (see EPA report released October 2020). More detailed actions should be set out, with more coherent policies on mitigation which are currently left largely to individual developers(see also paras 4.17 and 11.52)

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Much more rigorous approach with Southern Water, with clear targets for improvement of water quality. An open and coherent policy from FBC on mitigation, particularly in respect of nitrates.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

By showing how FBC intends to meet ecological targets which are of concern nationally as well as locally, through its Design policies

Your suggested revised wording of any policy or text:

See two paras above for what needs to be covered

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

See previous submissions: I wish to speak on behalf of a substantial number of residents of Hill Head

6) Policy: NE5 - Solent Wader and Brent Goose Sites

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Para 9.78 (policy NE5) refers to candidate sites for Brent Geese and other waders, but gives little detail. This is consistent with the frustrating lack of a coherent policy in respect of mitigation (eg for Brent Geese and other waders, as well as for nitrates): the fields west of Old Street, Hill Head could be considered for this purpose, having previously been frequented by Brent Geese when subject to appropriate cultivation. This site was the subject of an unsuccessful development application and appeal in 2018, and has since put forward by developers as a candidate site for mitigation, first for nitrates and latterly for Brent Geese.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

A clear strategic approach and policy in respect of mitigation, together with greater clarity about potential sites

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would ensure that FBC is in the driving seat rather than allowing individual developers to put forward ad hoc proposals.

Your suggested revised wording of any policy or text:

See above for issues that need to be covered

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

See previous submissions - I wish to speak on behalf of a substantial number of residents of Hill Head

Respondent details:

Title:	Mrs
First Name:	Andrea
Last Name:	Chase
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA32 Allocation should be REMOVED from the development plan because it is situated within the countryside within the Hamble Valley Area of Special Landscape Quality. The Development Plan says "there remains no development allocations in these areas" (paragraph 3.9). The inclusion of HA32 CONTRADICTS this paragraph! The planning status of HA32 as noted in the Development Plan states "Planning status as at 1st July 2020 is "Outline planning permission granted (P/18/0592/OA. THIS IS NOT TRUE and could be indicative of FBC pre-determining the decision councillors might make and therefore BE UNLAWFUL. HA32 is situated in a Private Road and is the subject of a JUDICIAL REVIEW because: 1. The application does not include land needed to reach the highway. FBC and the applicant continually ignore this requirement despite it being pointed out by a Planning Consultant and a Q.C. on numerous occasions. 2. The Nitrate calculation included as mitigation relies on untenable assumptions. 3. HA32 is the subject of a Judicial Review because it did not comply with the policies in the extant plan. 4. The site is considered by residents, and a leading planning Q.C. to be UNDELIVERABLE due to a number of reasons and therefore should NOT be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

REMOVE HA32 allocation.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the plan

Your suggested revised wording of any policy or text:

Remove HA32 allocation.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	John
Last Name:	Chase
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Remove HA32 from development plan. HA32 is situated within Hamble Valley Area of Special Landscape Quality and is in designated countryside. Development plan, paragraph 3.9 says "there remains no development allocations in these areas" : inclusion of HA32 contradicts paragraph 3.2 Development Plan reads Planning status of HA32 as at 1st July 2020 : Outline planning permission granted (P/0592/OA) . This is incorrect and not true. Planning meeting granting OA permission did not take place until 19th August 2020. This then could be indicative of FBC pre-determining the decision and therefore be unlawful. HA32 is the subject of an ongoing Judicial Review because the site is considered by residents and an eminent leading planning QC to be undeliverable for a number of reasons. It does not comply with the policies in the extant plan, the Nitrate calculation included as mitigation relies on untenable assumptions and being within a Private Road the application does not include land needed to reach the public highway. This latter fact has been pointed out to FBC and the applicant by both the eminent QC and a Planning Consultant and has been repeatedly ignored. Considered as undeliverable it should therefore not be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 allocation

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the plan.

Your suggested revised wording of any policy or text:

Remove HA32

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 18 December 2020 16:28
To: Planning Policy
Subject: Cllr S Cunningham response
Attachments: Soundness.pdf

From: Shaun Cunningham <[REDACTED]>
Sent: 18 December 2020 15:58
To: Consultation <Consultation@fareham.gov.uk>
Subject: Consultation- Local Plan

Good afternoon

Would like to forward my thoughts on the Local Plan. See attachment.

Regards

Shaun Cunningham

Get [Outlook for iOS](#)

Local Plan Consultation

Date: 18th December 2020

Forwarding my views on the public consultation - Fareham Borough Council's Local Plan (publication version)

Fareham Borough Council's Local Plan (publication version) as of December 2020 is based on housing need statistics that at the time of the public consultation (November / December 2020) can only be described as 'speculative'

During the consultation, the government were still considering responses to their consultation, carried out from the 6th August 2020 to 29th October 2020, on government proposals to reform the planning system in England. On the 16th / 17th December 2020 the Government's published their conclusions.

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

The Government has decided not to embrace the Office of National Statistics 2018 household projections to determine housing need and have instead reverted to using the 2014 household projections.

Setting the baseline

Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over 10 years (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded and individual cells need to be viewed in order to see the full number.

For information on re-organised authorities please see the section below "How should local housing need be calculated for re-organised authorities?"

Fareham Borough Council is bringing forward the Publication Version of the Draft Local Plan for public consultation having projected their housing need requirement to be 403 per year. This figure is determined by using the 2018 household projections without demonstrating any evidence the Government would be endorsing them at the start of the consultation.

It is clear this strategy of speculating on what household projections would be used by the government to determine housing need now results in the Draft Plan being fatally flawed and therefore the Local Plan is unsound and the council's public consultation on the draft cannot be considered to be fair or factual.

The council were fully aware the government may well make changes to the algorithm when the government published their review on reforming the planning process. The Council chose to take a risk that the 2018 household projections would prevail.

Furthermore, this LPA was fully aware neighbouring LPA's were lobbying government hard for a change in the housing need algorithm due to the large increase in housing need some were facing which they considered to be unfair.

Fareham Borough Council has removed some growth areas and potential development sites from the current draft compared to the 2017 draft, these sites may well be required to be reinstated so future projected housing need can be met.

Any public consultation on the published Draft Local Plan proposals required a degree of certainty, what we have is uncertainty and therefore the public could not comment with any sense of confidence the housing need number would not increase and therefore requiring other housing allocations to be identified to meet the projected housing need of this LPA.

There is also a possibility that changes to the housing need algorithm may result in neighbouring LPA's being pushed into a position where they have unmet housing need while other neighbouring LPA's who have established they have unmet need may well see their present unmet need increase. These potential adjustments could potentially have a major impact on this LPA's local plan overall projected housing numbers.

The data underpinning housing need presently being presented for the public to comment was based on supposition and therefore the public is being asked to comment on a local plan that may very well have to be amended.

In light of the government now publishing its final thoughts on 'Planning for the future' and clarifying the calculation to be used by LPA's to determine housing need projections, it is clear the Draft Plan will need to be revisited and updated to reflect this LPA's housing need requirement and therefore making the current draft unsound.

Any amendments to the Draft Local Plan, addressing the increase in housing need this LPA now faces through new housing allocations having to be identified will require a further period of public consultation if the threshold of soundness is to be achieved.

As of today (the final day for the public comment) the Local Plan does not meet the threshold of soundness required to enable the Council to Publish the plan and submit it to Government.

I wish it to be known, if the present plan is published then I would like the opportunity to address the inspector who will be appointed to oversee the inquiry to determine the soundness of the document.

Kind regards

Shaun Cunningham



Respondent details:

Title:	Mr
First Name:	Alan
Last Name:	Collins
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	25
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 4.2

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Do we really need more retail outlets at Market Quay when there are so many empty retail units in Fareham already? In light of the current pandemic shouldn't the council be rethinking it's policy? Retail is moving online we don't want or need more empty shops/charity shops.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the retail units from the plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would make the plan recognise current trends in shopping


Your suggested revised wording of any policy or text:

none

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mrs
First Name:	Janet
Last Name:	Cooke
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Since 2017 residents' concerns have not been considered regardless of protest marches, deputations and objections raised. For example, despite a petition exceeding the prerequisite number of signatures needed to trigger a Full Council meeting debate, such debate was refused, even after a challenge was raised to the Council's scrutiny Board. It is discriminatory that community-generated evidence carries less weight than that provided by Developers consultants. E.g. regarding previous use of land in Nitrate budget calculations similarly with traffic survey results captured by residents and Community Speedwatch teams. Para 4.7 The Warsash Neighbourhood Forum (although now defunct) were never consulted with respect to their intention to allocate housing, in line with Para 66 of the NPPF. Policy HA1 (currently a Greenfield site), is proposed to be re-designated as an urban area (via the re-definition of Settlement Boundaries ref. WW17). In the Foreword to Publication Plan: Greenfield sites are less favoured locations for development. Para 2.10 states Fareham Borough will retain its identity, valued landscapes and settlement definition and will protect its natural, built and historic assets. The proposed allocation of Policy HA1 contradicts these aspirations and those of Para 2.12 "Strategic Priorities" which strive to maximise development within the urban area and away from the wider countryside and to create places which encourage healthier lifestyles. The re-designation of the Policy HA1 to urban status and the movement of the Settlement Boundary to encompass it, is a blatant and possibly, unethical, manoeuvre by stealth of the council, to suit its own objectives. Policy HP4 (Para 5.24) HA1 fails to meet criteria e) as the proposal would demonstrably have unacceptable environmental, amenity and traffic implications. Policy HA1: Page 51 refers to traffic routes and despite recommendation to limit access to 6 dwellings on Greenaway Lane, the plan proposes for up to 140 dwellings to use this as access through a widening of the Lane. This will result in a considerable negative impact on the character of the lane and to the safety of its non-vehicular users. In general, Page 54 suggests 7 new accesses onto the already very busy Brook Lane and Lockswood Road, as well as one additional access at Brook Lane, via 3 entry points from Greenaway Lane. The position and proximity of these access points will be a recipe for serious gridlock and accident blackspots. Para 5.41 The LPA argues for an average occupancy rate of 2.4 for a 4/5 bed dwelling in regards to Nitrate budget calculations. To the contrary, it is stated here that the spectrum of occupancy for affordable homes will be in the range of 4-6. The claims in the Publication Plan are therefore not reflected in the council's own proposals and requirements. Para 10.26 Infrastructure Delivery Plan Section 5.4 Education is planned with HCC but the period of any proposed extensions for child placements is only up to 2021 whereas the Plan covers up to 2037. This is not a sound approach for the education of our children. Para 10.27 Infrastructure Delivery Plan Table item 83 calls for section 106 provisions of additional Early Years Foundation Provision (EYP) within the Western Wards however HA1 does not indicate the placement of a nursery or pre-school within the development area. Where is the child placement contribution to be allocated as the IDP calls for the addition of 83 placements whereas there are over 1000 new dwellings being proposed for the Warsash area alone. Para 10.26 Infrastructure Delivery Plan calls for the expansion of health care provision through the addition of further GP locations in the Western Wards, However the table provided within the document only provides an historic timeline pre-dating the Local Plan. This is not a Sound approach taking into consideration that HA1 alone will bring an additional 830 dwellings.. Para 10.15 Transport plan does not include an analysis of streets where the majority of the houses are proposed. Why, when there are 830 new dwellings proposed, hasn't more consideration been given to HA1 in the transport assessment. With an average of 2 cars per dwelling, an additional 1660 vehicles will be on local roads and there is no reference for the mitigation required to reduce congestion by 2037. The Plan fails the Test of Soundness by not being Positively Prepared in this respect. Para 10.14 The Local Plan Strategic Transport Assessment at Para 14.16 reads; "In conclusion, based on the work of this Strategic Transport Assessment, it is considered that the quantum and distribution of the development proposed in the Fareham Local Plan, and the resulting transport impacts, are capable of mitigation at the strategic level, and that the plan is therefore deliverable and sound from a transport perspective." This statement doesn't include the area HA1, of the local plan with 830 homes and isn't assessed within the The Local Plan Strategic Transport Assessment document. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" these not shown in the Masterplan Para 8.60 Section 8 mentions the requirement of meeting CO2 emission reduction targets, but instead of stating what the targets should be, the Plan simply refers to individual developments power generation rather than what each should deliver over and above Building Regulations requirements, on this basis the plan is not Positively Prepared Para 11.34 The council will support applications where development exceeds Building Regulations but no percentage target for improvement has been set. The Plan is therefore not a Sound and effective approach to carbon emissions reduction in the Borough. Para 11.36 Developers are encouraged to design for natural ventilation and green infrastructure but no standards are set. Just meeting building regulations will not see the country meet the Government promised carbon reductions. The council therefore should set standards to ensure developers are designing for sustainability much like the London boroughs that are using new standards of SAP10 which although not yet within building regulations, should be adhered to. Strategic Policy DS1 (Paras 5.6 and 3.36) deals with the need (in exceptional circumstances and where necessary and justified) for residential development in the countryside on previously developed land. Additionally, Policy HP1 calls for the efficient use of existing buildings to meet such need on a one-for one replacement dwelling basis. These conditions do not apply to HA1 and therefore it seems the "convenient" alternative was for FBC to redraw the urban boundary Para 1.16: No mention is made of the 2017 unadopted draft Plan and Officers confirm it is the previous, 2015 plan which is extant. Para 4.8 Allows the LPA to consider Housing sites allocated in the previous adopted (extant) Local Plan. Yet, whilst HA1 did not feature in the extant 2015 Plan, page 38 ignores this, stating that housing will be provided through HA1 and other local sites. The total new homes proposed for specific sites across the Borough (not including Welborne) is 1342. It is an unfair distribution for HA1 (proposed at 830 dwellings) to contribute 62% of this quantum. Moreover, whilst FBC recently enjoyed an overall reduction in new houses of 22.5% they are now proposing Warsash should endure a 20% increase in their local number! There is no joined up "Masterplan" for HA1 (with developers working in complete

Please provide details you have to support your answers above

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Leave Green areas as green areas. Full open consultation. Respecting the view of local people who will be impacted on. Sound investment in infrastructure and services whenever ANY development is undertaken which should be spread out rather than condensed as proposed

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Withdrawing the rewriting of Green to become Brown site boundaries. Offer clear protection from development any nearby waters and nature sites. The council we pay for should be morally bound to represent its public openly and fairly. Listen to local voices. I am not qualified as legal representative so would not know how to make reasonable local views translate into 'legally sound or compliant' much like i would not expect a local councillor to undertake open heart surgery.


Your suggested revised wording of any policy or text:

Thats your job . I'm busy works all hours in the NHS, and trying to find time to protect my community. Yours very fed up with traffic and being overdeveloped in Warsash . Jan

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Thomas
Last Name:	Cooksley
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: HOUSING ALLOCATIONS (HA1, HA3-4, HA7, HA9-10, HA12-13, HA15, HA17, HA19, HA22-24, HA26-44)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The area to the East of Downend should be removed from the Local Plan

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Listening to the Residents

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Listening to the residents

Your suggested revised wording of any policy or text:

Remove the land to the East of Downend for any development now and for the future

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To have a Resident's voice heard

Keely, Lauren

From: Caroline Dibden [REDACTED]
Sent: 14 December 2020 16:00
To: Consultation; Planning Policy
Cc: Nicola Revolta
Subject: CPRE Hampshire Response to Reg 19 Fareham Local Plan 2037
Attachments: CPREH_Submission Fareham Local Plan 2037_Dec20.pdf

Dear Sirs,

Please find attached CPRE Hampshire's response to the Reg 19 Publication Version of the Fareham Local Plan 2037. A separate form has been completed for each policy, but these are all included within one pdf document.

I would be very grateful if you could acknowledge receipt.

Caroline Dibden
Vice President



[Join us](#) - The most effective way for you to help protect the countryside is to [become a member of CPRE](#)
[Sign up for our E-newsletter](#) and [read our latest news](#)



Winnall Community Centre, Garbett Road, Winchester, Hants. SO23 0NY
Registered Charity No: 1164410

15th December 2020

FAO: planningpolicy@fareham.gov.uk

Fareham Local Plan 2037 Publication
Regulation 19 Consultation

Dear Sirs,

Please find attached comments from CPRE Hampshire regarding the Regulation 19 Fareham Local Plan 2037 consultation.

Firstly, a general point; CPRE Hampshire is extremely pleased to see that Fareham BC have approached their new Local Plan from a landscape-based perspective, a process which we wholly support. Furthermore, we fully endorse Fareham BC's inclusion of a Climate Change policy, which must underpin all other policies and spatial planning.

Furthermore, we are pleased to see that Fareham have adopted housing numbers based on the latest available housing projections from the ONS, the 2018-based projections, which show a considerable reduction in estimated local need.

However, we remain disappointed that there seems to be no mention of a potential new South Hampshire **Green Belt** in the Reg 19 consultation. In an earlier consultation by Fareham BC in July 2019, there were a number of mentions of this option, notably in Section 10c regarding the Meon Valley, where it said "The Council will also be working with PUSH to consider the potential for greenbelt land across local authority areas, and there could be scope for this area to become part of a South Hampshire greenbelt." As CPRE Hampshire has long campaigned for a sub-regional area of restraint in order to encourage urban regeneration and prevent sprawl, this was very much welcomed. Sadly, this does not seem to have been included in the Reg 19 document, and we consider its exclusion to be a significant wasted opportunity, as the NPPF allows local authorities to designate Green Belt as part of the Local Plan process. It has been agreed that the PFSH authorities are to consider a new Green Belt as part of their forthcoming Statement of Common Ground and we would have hoped to see Fareham BC leading the way.

CPRE Hampshire has completed Response forms for individual policies which are attached below this letter, but in summary our headline comments are as follows:

Development Strategy

Strategic Policy DS1 Development in the Countryside: CPRE Hampshire agrees with these principles but notes that a South Hampshire Green Belt could aid considerably in achieving these goals.

Strategic Policy DS2 Strategic Gaps: We note the decision to re-define strategic gaps (the Meon and Fareham-Stubbington gaps) and suggest that a new Green Belt could achieve this. An area could easily be defined to encompass the Meon Valley, which could link to an area of larger Green Belt to the north of the Borough in Winchester District.

Strategic Policy DS3 Areas of Special Landscape Quality: CPRE Hampshire agree with Fareham BC's analysis of the Borough's varied landscapes and supports any intention to define them as Areas of Special Landscape Quality, illustrated in Figure 3.3. However, CPRE Hampshire suggests that some of these could be further protected if they also formed part of a wider South Hampshire Green Belt, in particular the Upper Hamble Valley, the Meon Valley, the Forest of Bere and Portsdown Hill.

Climate Change

Strategic Policy CC1 Climate Change: CPRE Hampshire believes that one of the most fundamental ways of combating the likelihood of adverse climate change, is to plan development where it can use better public transport and be less reliant on the car. The aspirations in Policy CC1 are more about how development can respond to climate change, and rather less about how spatial planning of future development can help prevent it. We consider that this is a missed opportunity. However, we feel that Criterion a) does not go far enough. According to Camilla Ween, Harvard Loeb Fellow, speaking on behalf of Transport for New Homes “Transport is responsible for about 26% of greenhouse gas emissions, much arising from personal car journeys. Our society will not be able to achieve the UN goals if we do not change the way we travel; that means we need to create new communities that are NOT car dependent. That means careful consideration of where new development is located, as well as how we design new communities, for example, places that are well connected with high quality public realm and movement infrastructure that encourage people to want to move to a car-free lifestyle.” It must be a fundamental tenet of the Fareham Local Plan that NO development should be permitted that relies on the car as its main means of access.

Nothing less than a drastic change to spatial strategy and a move away from South Hampshire’s historic pattern of sprawling suburbs will enable any meaningful contribution to the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that have become entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture. The adoption of a South Hampshire Green Belt would assist this by encouraging urban redevelopment, and preventing sprawl into the countryside where modal change to walking, cycling and public transport is very much more difficult to achieve.

Housing

Policy H1 Housing: CPRE Hampshire recognises that the current guidance from MHCLG requires the calculation of local housing need (LHN) based on figures from the 2014-based household projections, although a recent MHCLG consultation suggested a new methodology. Whatever the methodology, CPRE Hampshire supports Fareham BC in using the most up-to-date household figures based on the 2018-based projections. We also welcome the removal of Policy HA2 from the Reg 19 Local Plan.

Policy HA1 Warsash: CPRE Hampshire does not believe that the proposed development around Warsash can be considered truly sustainable, reliant as it is on the car as the main means of transport. We are concerned about the lack of a masterplan and believe the proposed framework does not fulfil a place making function.

Policy HP4 Five-Year Housing Land Supply: CPRE Hampshire has significant concerns about the unintended consequences of this policy, specifically its linkage with DS1, and believe that it may lead to site selection looking outside the Urban Area in the first instance.

Policy HP6 Exception Sites: The potentially inadvertent use of the word OR in Criterion c) could allow significantly large exception sites to be allowed, as long as they remain below the threshold of 5% of the size of the adjacent settlement. There should be a fixed upper limit.

Natural Environment

Strategic Policy NE1 Protection of Nature Conservation, Biodiversity and the Local Ecological Network: CPRE Hampshire supports the use of ecological network mapping to conserve nature and protect biodiversity and as a tool for influencing spatial planning.

Policy NE2 Biodiversity Net Gain: CPRE Hampshire supports the requirements for 10% biodiversity net gain on all development.

Policy NE4 Water Quality effects on the SPAs, SACs and Ramsar sites of the Solent: CPRE Hampshire understands there is an outstanding judicial process underway regarding the effectiveness of Fareham BC’s proposals for mitigating nitrate and other pollutants on the Solent and other protected waterways. At this point, CPRE Hampshire is therefore unable to endorse the proposed policy until the legal issues have been resolved.

Policy NE6 Trees, Woodlands and Hedgerows: CPRE Hampshire agrees with any policy that supports the preservation or enhancement of trees, woodlands and hedgerows.

Policy NE8 Air Quality: CPRE Hampshire supports the requirements for air quality improvement but considers more could be achieved if development were only to be permitted in locations around mass public transport hubs, rather than being car dependent.

Policy NE9 Green Infrastructure: CPRE Hampshire agrees that green infrastructure is important to the wider ecological network and to the health and wellbeing of residents but suggests that it would be better protected in perpetuity were it to be formalised as part of a new Green Belt.

Transport and Other Infrastructure

Strategic Policy TIN1 Sustainable Transport: CPRE Hampshire recognises that Fareham BC aspire to have 'good growth' with existing and proposed transport corridors influencing choice of development, but we feel the policy does not go far enough. The Council should feel empowered to reject development which is not already located around, or can provide, public mass transit hubs, in particular the rail network.

The principles of development and transport as set out in the Transport for New Homes checklist should be followed - <https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>.

Design

Strategic Policy D1 High Quality Design and Placemaking: The design quality of future developments starts with overall masterplanning and landscape context as well as specific building details. Fareham has seen a proliferation of poorly designed car dependant nondescript developments over recent years, and it is critical that major improvements are made for the future.

Yours faithfully,

Caroline Dibden

Vice-President
CPRE Hampshire



The countryside charity
Hampshire

A1 Is an Agent appointed:

No, an agent is not appointed

A2 Please provide your details below:

Title:

Mrs

First Name:

Caroline

Last Name:

Dibden

Job Title:

Vice-President

Organisation:

CPRE Hampshire, the countryside charity

Address:

**Winnall Community Centre,
Garbett Road,
Winchester,
Hampshire,
SO23 0NY**

Telephone:

Email Address:

POLICY DS1: Development in the Countryside

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
X	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 3.29 – 3.36

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy DS1: Development in the Countryside

B1c Which part of the Policies Map?

Areas of Special Landscape Quality and Strategic Gaps

- a) East of Welborne,**
- b) the Strategic Gap along the Meon, and**
- c) to the north-west of the borough.**

2	Do you think the Publication Local Plan is:	Yes	No
		YES	
	Legally compliant		
	Sound		NO
	Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire STRONGLY SUPPORTS the overall approach taken by Fareham BC in the Fareham Local Plan 2037 for a spatial strategy based on countryside, which is justified as it is in accordance with the aspirations as set out in the NPPF for development to be brownfield first, and for countryside to be protected for its intrinsic value and beauty, and for protection of Best and Most Versatile agricultural land. It is also supported by the Government's 25-year Environment Plan and for the recommendations as set out by the Climate Change Committee.

Furthermore, CPRE Hampshire SUPPORTS the Vision for the Fareham Local Plan 2037 which states that Fareham BC seek to retain its identity, and the identity of individual settlements within the Borough, through measures that seek to retain the valued landscapes and settlement definition.

We also SUPPORT Strategic Priority 2 which seeks to maximise development in the urban area and away from the wider countryside, valued landscapes and those of special quality and spaces that contribute to settlement definition.

CPRE Hampshire believes that the Vision and Strategic Priority 2 would both be better achieved if a new Green Belt was designated, due to its permanence and effectiveness. We submitted to Fareham BC and to PFSH a report by NEF Consulting on the potential socio-economic and environmental benefits of a Green Belt: <https://www.cprehampshire.org.uk/our-campaigns/south-hampshire-green-belt/>. This demonstrates the considerable financial benefits as well as to health and wellbeing, climate change and natural capital of protecting the green space near to population centres, in perpetuity, something that only Green Belt is designed to achieve.

Looking at the specific policy wording, CPRE Hampshire believes that criterion (e) of **Policy DS1** is unsound, specifically in the way it permits development in the countryside that is compliant with Policies **HP4, HP5 and HP6**. Permissions that might be compliant with these policies appear to be in direct contradiction with the other criteria in **Policy DS1**, and the policy is therefore internally inconsistent.

HP4 relates to the Five Year Housing Supply (5YHLS) and allows residential development outside the urban area boundary where the Council is unable to demonstrate a 5YHLS. It is believed that the Government intends to remove 5YHLS test in the planning reforms, so this policy may be redundant and should be reworded to future proof its deletion. However, that notwithstanding, the main problem is that the wording of Policy HP4 and its linkage with **DS1** could unintentionally lead to countryside locations taking priority over alternative, more sustainable, urban or brownfield locations.

HP5 relates to the provision of affordable housing on sites of 10 or more, and its linkage to **DS1** could unintentionally suggest that Fareham BC accepts in principle the development of ANY affordable housing site outside the urban area boundary. The risk is that the linkage could potentially enable large scale housing development in the countryside as long as it could be demonstrated that 40% affordable housing would be achieved.

HP6 relates to small rural affordable housing exception sites, and whilst CPRE Hampshire supports the provision of rural affordable housing, the concern is that the linkage with **DS1** could inadvertently lead to a series of separate applications which in combination amount to significant levels of development in the countryside. The cumulative impact on the separation of settlements resulting from a number of sites each individually sub- 1 hectare or <5% of the adjacent settlement must be considered, but at the moment the policy has no mechanism for dealing with this potential eventuality. See separate comments on **Policy HP6** as regards the use of the word *OR*.

CPRE Hampshire SUPPORTS criteria i) to v) of **Policy DS1** and believe they provide a sound underpinning of the principles aspired to by Fareham BC.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Fareham BC should look at the areal extent of a possible South Hampshire Green Belt as part of this Local Plan, as it has been confirmed by Leader Cllr Woodward that they wish to see such a designation to protect the countryside and gaps.

Remove the linkage of **Policies HP4, HP5 and HP6** with **Policy DS1**.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Including a proposed South Hampshire Green Belt would be in accordance with the aspirations as set out by the Council in council meetings, PFSH meetings and in press releases.

Removing the linkage of **Policies HP4, HP5 and HP6** with **Policy DS1** would remove the internal inconsistency by removing the possibility of inadvertent development in the countryside.

B4c Your suggested revised wording of any policy or text:

Remove the linkage of **Policies HP4, HP5 and HP6** from Policy **S1 (e)**.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for Local Plans to take the countryside into account when devising spatial development strategy, and we would like to appear at the Hearings to support Fareham BC in choosing this approach. Our expertise lies in spatial strategy and reconciling development requirements with the environmental constraints of countryside, and its uses and purposes.

POLICY DS2: Development in Strategic Gaps

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 3.43 to 3.46, Para 3.10

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy DS2: Development in Strategic Gaps

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

NO

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC to designate strategic gaps between Fareham / Stubbington and the Western Wards (Meon Gap) and between Fareham / Bridgemary and Stubbington / Lee-on-the-Solent (Fareham- Stubbington Strategic Gap). However, a study carried out on behalf of CPRE Hampshire in January 2019, by consultants West Waddy, showed that historically strategic gaps in South Hampshire have failed to adequately prevent coalescence of settlements. This report was shared with Fareham BC as a member of the Partnership for South Hampshire, and can be submitted as part of our evidence on this matter to the examination hearings.

“An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements” – January 2019, West Waddy.

The conclusions show that through appeals and permissions the gaps designated in South Hampshire (including Fareham) have been significantly reduced over time, and are thus an ineffective policy and thus unsound. Para 3.10 confirms that this has been the case in Fareham.

The findings of this report show that “In the national context, South Hampshire is fairly unique among the large urban areas in England in having no designated Green Belt, with reliance instead being placed upon Gaps designated in Local Plans to prevent the coalescence of settlements.”

Furthermore “given the major urban extensions currently being proposed and the past history of erosion of Gaps through subsequent permissions being granted, a strong argument can be made that the current Gap policies across the sub-region are failing in their remit to prevent coalescence and sprawl, which is ultimately likely to lead to currently separate settlements forming one large South Hampshire conurbation and expanding out into the adjoining areas of countryside. The exceptional circumstances therefore exist to demonstrate that a new stronger policy backed by explicit Government advice is needed to prevent this happening and the tool for this is a Green Belt, which is already in use around most large urban areas in England. South Hampshire is the exception in having no such designation.”

CPRE Hampshire has submitted to Fareham BC and to PFSH a report by NEF Consulting on the potential socio-economic and environmental benefits of a Green Belt: <https://www.cprehampshire.org.uk/our-campaigns/south-hampshire-green-belt/>

Notwithstanding the above comments regarding a new Green Belt, CPRE Hampshire SUPPORTS the removal of the earlier proposed Strategic Growth Area SGA, previously entitled HA2 (in the Reg 18 consultation version) from the now proposed Fareham-Stubbington Strategic Gap. The previous inclusion of the SGA was clearly subject to objections by neighbouring Gosport BC, which would have undermined any Duty to Co-operate and thus soundness. It was also objected to by many CPRE members and is therefore of concern to us.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Fareham BC should look at the areal extent of a possible South Hampshire Green Belt as part of this Local Plan, as it has been confirmed by Leader Cllr Woodward that they wish to see such a designation to protect the gaps between settlements.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Including a proposed South Hampshire Green Belt would be in accordance with the aspirations as set out by the Council in council meetings, PFSH meetings and in press releases, and would lead to a much more rigorous policy to prevent coalescence which is Fareham BC’s stated aim.

A need for a South Hampshire Green Belt was confirmed by Cllr Woodward in the Fareham BC Executive Committee at 6pm on Monday 7th December 2020. Its omission from the Reg 19 Local Plan consultation is thus not in accordance from the council’s own publicly announced policy.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for a new South Hampshire Green Belt, and we would like to appear at the Hearings to further explain our justification and why Fareham merits the exceptional circumstances required to designate a new Green Belt. We have a petition which has been signed by nearly 15,000 people asking Fareham BC (alongside Eastleigh BC, Winchester CC and Test Valley BC) to designate a Green Belt as part of its Local Plan process.

POLICY DS3: Landscape

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
X	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 3.48 to 3.58

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy DS3: Landscape

B1c Which part of the Policies Map?

All Areas of Special Landscape Quality

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound	YES	
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE fully SUPPORTS the approach taken by Fareham BC in respect of analysing and including Areas of Special Landscape Quality as part of its development strategy and as Strategic Policy S3. This is in accordance with the aspirations outlined in the NPPF to value landscape for its intrinsic character and beauty of the countryside, as outlined in NPPF Para 170 a) and b).

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for Local Plans to take landscape into account when devising spatial development strategy, and we would like to appear at the Hearings to support Fareham BC in choosing this approach. Our expertise lies in spatial strategy and reconciling development requirements with the environmental constraints of, and impacts upon, the wider landscape.

POLICY H1: Housing Provision

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 4.1 to 4.20

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy H1: Housing Provision

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

NO

Complies with the duty to co-operate

YES

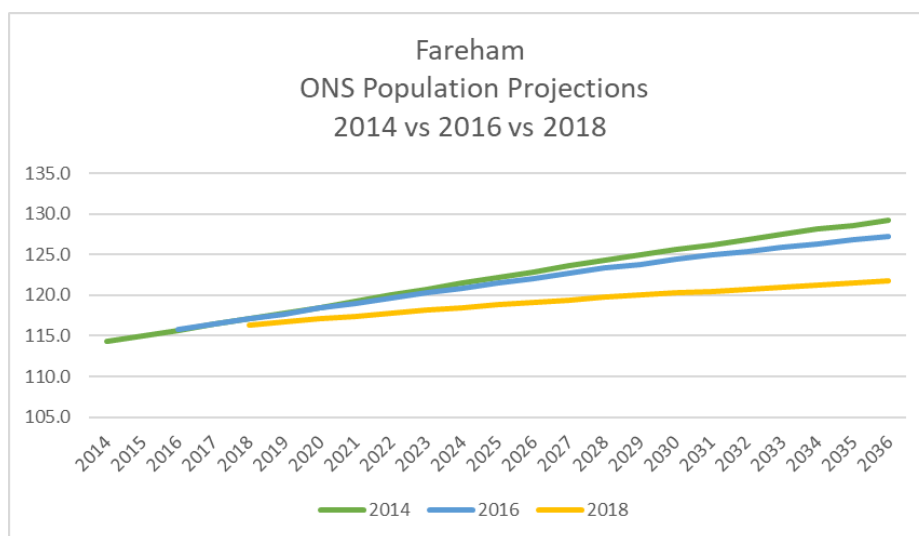
B3 Please provide details you have to support your answers above

The approach taken by Fareham BC to calculating housing need for this Reg 19 version is based upon the MHCLG consultation on a new standard method in August 2020, which showed Fareham's housing need to be lower (403 dpa) than using the previous standard method (514 dpa). CPRE Hampshire SUPPORTS the use of the latest base data on household projections (the 2018-based projections from the ONS) as it conforms with Para 31 of the NPPF "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

As can be seen from the graph below, the most up-to-date population projections (in 000's) for Fareham evidences the trend towards a lower requirement, and this would translate into a lower household projection. The impact of Covid-19, and corresponding economic fallout, on migration patterns will remain unclear for some time, and it is therefore sensible to use a cautious approach to planning and development.

However, for Fareham to agree to take unmet need from Portsmouth is premature, predating as it does the revised statement of common ground from PFSH, and therefore Policy H1 is unsound.

It is also clear that there remains a significant reliance on delivery of housing at Welborne, which is subject to a separate plan. Delays to infrastructure finding at Welborne could have an impact on Fareham's overall strategy for delivery of its housing needs in the plan period.



B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the requirement to take housing from Portsmouth CC.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a recognised authoritative voice on Hampshire's housing numbers, the standard methodology and has been involved in this aspect of Fareham's Local Plans since the time of the South East Plan in 2005, and the formation of PfSH (Partnership for South Hampshire).

CPRE Hampshire is part of an expert group in the National CPRE network on housing numbers, and would like to appear at the hearing sessions to SUPPORT the use of the most up-to-date household projections.

POLICY HA1: North and South of Greenaway Lane, Warsash

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input checked="" type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA1 North and South of Greenaway Lane, Warsash

B1c Which part of the Policies Map?

Figure 4.1

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

NO

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

CPRE Hampshire has significant concerns about the piecemeal development already seen, and proposed, in the Warsash area. Population growth in the 10 years 2009-2019 has reached 9% in Warsash and the western wards, while Fareham itself has only grown by 4%. As Warsash has no access to the rail network, this pattern of development could not be considered sustainable. It therefore fails the soundness tests.

An indicative framework as shown in Figure 4.1, but this does not meet the requirements for a masterplan, and it is not adequate for long-term planning to integrate the various separate sites and applications by a series of different developers. Policy HA1 will fail to meet any government aspirations for placemaking as set out in the NPPF Chapter 12, Paras 124 to 130, and is therefore unsound.

Para 124 of the NPPF states “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

Para 125 of the NPPF states “Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics.” It is apparent from discussion with CPRE Hampshire members that there has not, to date, been any meaningful involvement of local communities.

It is clear that the settlement policy boundaries have been moved to accommodate the applications pending for Warsash. This is not consistent with a plan-led approach but is simply reactive to a developer-led situation, and takes no account of the area’s defining features.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

More analysis of the sustainability criteria for the overall development strategy, such as access to public transport is required before sites such as HA1 are confirmed. Has every opportunity for brownfield development around rail networks been ruled out?

Much more consultation with the local community is required before the proposed HA1 framework meets NPPF prerequisites.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has worked for some years with local campaign group Save Warsash and the Western Wards, and a number of our members will be affected by the proposals for such a large allocation of housing to one small settlement. We would like to take part in the hearing sessions to represent their concerns for initial choice of an unsustainable site, loss of countryside and open space in Warsash, and poor design due to lack of a masterplan.

POLICY HP4: Five-year housing land supply

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 5.22 to 5.28

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy HP4: Five-year housing land supply

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

NO

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

Policy HP4 states “If the Council cannot demonstrate a five-year supply of land for housing against the housing requirement set out in Policy H1, additional housing sites, outside the Urban Area boundary, may be permitted where they meet all of the following criteria.....” The problem with this policy is that inadvertently it encourages the first choice of sites to be “outside the Urban Area”. CPRE Hampshire is sure that this is not what Fareham BC intends, and in any event it would not be in accordance with the councils own aspirations for a brownfield first approach, nor in accordance with the NPPF Para 137, and is therefore unsound. A sequential approach should be used, even in the event of a lack of a five-year housing land supply.

The problem is exacerbated by the linkage of **Policy HP4** with **Policy DS1**, particularly **DS1 Criterion (e)** as discussed above.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Policy HP4 should be rewritten to include a sequential approach, which “makes as much use as possible of suitable brownfield sites and underutilised land” as per Para 137 (a) of the NPPF.

The linkage of **Policy DS1 (e)** and **Policy HP4** should be removed.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would be in accordance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is part of an expert group in the National CPRE network on housing numbers, and the five-year housing land supply, and would like to appear at the hearing sessions to discuss its impact on the Fareham Reg 19 Local Plan.

POLICY HP6: Exception Sites

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 5.43 to 5.51

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy HP6: Exception sites

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

NO

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

The second part of **Policy HP6, Criterion (c)**, would allow exception sites with a limit of 1 hectare *OR* a proviso that the scheme does not exceed 5% of the size of the adjacent settlement. The problem is the word *OR*, as this could lead to large sites adjacent to large settlements being permitted as they would still be beneath the 5% cut-off. For example, Fareham town is a large settlement, of some 20,000 households, and so an exception site of up to 5% could itself number 1,000 dwellings. CPRE Hampshire is sure that this is not what was intended by Fareham BC as the aspiration is for small sites on urban boundaries.

The problem is exacerbated by the linkage of **Policy HP6, Criterion (c)**, with **Policy DS1**, particularly **DS1 Criterion (e)** as discussed above.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Policy HP6 should be rewritten to include a sequential approach, which “makes as much use as possible of suitable brownfield sites and underutilised land” as per Para 137 (a) of the NPPF.

Criterion c) should be reworded to remove the reference to *OR* 5% of the size of the adjacent settlement and have a fixed upper limit of what is meant by ‘small sites’ as identified in the justification text (Para 5.46).

The linkage of **Policy DS1 (e)** and **Policy HP6** should be removed.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Any ambiguity on what a “small site” means would be removed giving clarity for applicants and for FBC.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of affordable housing, such that it is located and designed appropriately, and would like to appear at the hearing sessions to discuss the impact of Policy HP6 on the Fareham Reg 19 Local Plan.

STRATEGIC POLICY CC1: Climate Change

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 8.1 to 8.10

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy CC1: Climate change

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

NO

Sound

NO

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

CPRE Hampshire generally SUPPORTS the approach taken by Fareham BC to Climate Change. But we believe that **Policy CC1, Criterion (a)** does not go far enough to encourage/enforce a truly sustainable pattern of development and is unlikely to lead to a meaningful reduction of emissions from private car use.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires that a local authority's development plan documents must: (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

The NPPF Para 148 further includes the requirement that “the planning system should support the transition to a low carbon future in a changing climate”, should “shape places in ways that contribute to radical reductions in greenhouse gas emissions” and Footnote 48 “in line with the objectives and provisions of the Climate Change Act 2008.”

CPRE Hampshire believes that one of the most fundamental ways of combating the likelihood of adverse climate change, is to plan development where it can use better public transport and be less reliant on the car. The aspirations in **Policy CC1** are more about how development can respond to climate change, and rather less about how spatial planning of future development can help prevent it. We consider that this is a missed opportunity. According to Camilla Ween, Harvard Loeb Fellow, speaking on behalf of Transport for New Homes “Transport is responsible for about 26% of greenhouse gas emissions, much arising from personal car journeys. Our society will not be able to achieve the UN goals if we do not change the way we travel; that means we need to create new communities that are NOT car dependent. That means careful consideration of where new development is located, as well as how we design new communities, for example, places that are well connected with high quality public realm and movement infrastructure that encourage people to want to move to a car-free lifestyle.” It must be a fundamental tenet of the Fareham Local Plan that NO development should be permitted that relies on the car as its main means of access.

Nothing less than a drastic change to spatial strategy and a move away from South Hampshire’s historic pattern of sprawling suburbs will enable any meaningful contribution to the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that have become entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture.

Policy CC1 is therefore not legally compliant unless the large part of Fareham’s spatial strategy is geared to development around mass public transport hubs and avoiding sites which are car-dependant. It is clear that sites such as Policy HA1 would fail to meet this condition.

CPRE Hampshire recommends the checklist provided by Transport for New Homes, which sets out an objective approach to planning new housing areas without dependence on cars:

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2019/10/checklist.pdf>

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

CPRE Hampshire recommends strengthening **Policy CC1, Criterion (a)** to enable a spatial strategy more likely to meet the requirements set out in Section 19(1A) of the Planning and Compulsory Purchase Act 2004, and the NPPF, by including a requirement for mass public transport hubs to be the first approach for development, and to enable Fareham to refuse car-dependent applications.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would be in accordance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004, and the NPPF Para 148.

B4c Your suggested revised wording of any policy or text:

- (a) A development strategy that minimises the need to travel by allocating sites and generally directing development to locations **near to mass public transport hubs**, with better services and facilities, or where they are capable of being improved.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning housing, such that it is located and designed appropriately around public transport hubs to minimise emissions and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy CC1** in this regard.

POLICY NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input checked="" type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.5 to 9.27

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

POLICY NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network

B1c Which part of the Policies Map?

The Local Ecological Network map in Appendix C

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound	YES	
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

The approach taken by Fareham BC is sound, and CPRE Hampshire SUPPORTS the requirement for nature to be conserved and ecological networks to be protected as per the forthcoming Environment Act.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning development, such that it is located and designed appropriately to conserve and enhance the biodiversity of the area and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE1** in this regard.

POLICY NE2: Biodiversity net gain

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
X	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.28 to 9.44

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy NE2: Biodiversity net gain

B1c Which part of the Policies Map?

The Local Ecological Network map in Appendix C

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

YES

Sound

YES

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

The approach taken by Fareham BC is sound, and CPRE Hampshire SUPPORTS the requirement for biodiversity net gain as per the forthcoming Environment Act.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning development, such that it is located and designed appropriately to see a net gain in biodiversity of the area, and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE2** in this regard.

POLICY NE4: Water quality effects on the SPAs, SACs and Ramsar sites of the Solent

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.50 to 9.54

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

POLICY NE4: Water quality effects on the SPAs, SACs and Ramsar sites of the Solent

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

NO

Sound

YES

Complies with the duty to co-operate

YES

B3 Please provide details you have to support your answers above

CPRE Hampshire understands there is an outstanding judicial process underway regarding the effectiveness of Fareham BC's proposals for mitigating nitrate and other pollutants on the Solent and other protected waterways. At this point, CPRE Hampshire is therefore unable to endorse the proposed policy until the legal issues have been resolved.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire's remit covers protection and enhancement of both land and seascape, including Hampshire's iconic chalk streams and rivers, and the Solent. In the absence of an outcome on the legal matters, the hearing session may be the first opportunity to evaluate the effectiveness and legality of the proposed policy.

POLICY NE6: Trees, woodland and hedgerows

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.79 to 9.89

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

POLICY NE6: Trees, woodland and hedgerows

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound	YES	
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE6** is sound. The Climate Change Committee has called for a 40% increase in the extent of hedgerows by 2050 to help tackle the climate emergency, and we would thus like to see more hedgerows planted and restored in Fareham BC.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ **NO** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

POLICY NE8: Air quality

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.98 to 9.118

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy NE8: Air quality

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound	YES	
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE8** is sound.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

NO

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

POLICY NE9: Green infrastructure

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.119 to9.125

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy NE9: Green infrastructure

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound	YES	
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE9** is sound. However, we believe that a link with **Policy HE1** should be included within **Policy HE9** itself, rather than just within the supporting text in **Para 9.122**. CPRE Hampshire further believes that much better Green Infrastructure provision could be safeguarded over the long term if it were to be incorporated within a South Hampshire Green Belt.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

 Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of green infrastructure alongside planning development, such that it is located and designed appropriately, in order to benefit biodiversity, natural capital, but also residents' health and wellbeing. We would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE9** in this regard, and to discuss whether a South Hampshire Green Belt could ensure green infrastructure is protected in perpetuity.

POLICY TIN1: Sustainable transport

B1 Which part of the Local Plan is this representation about?

X	A paragraph	Go to B1a
X	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 10.1 to 10.11

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy TIN1: Sustainable transport

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound		NO
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy TIN1** to be a good starting point. CPRE Hampshire recognises that Fareham BC aspire to have ‘good growth’ with existing and proposed transport corridors influencing choice of development, however we feel **Policy TIN1** does not go far enough. The Council should feel empowered to reject development which is not already located around, or can provide, public mass transit hubs, in particular the rail network. The policy as it stands does not give Fareham BC a sufficiently robust mechanism for achieving this. It is therefore unlikely to comply with the aspirations to meet climate change objectives as set out in **Policy CC1** or for air quality in **Policy NE8**.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

The principles of development and transport as set out in the Transport for New Homes checklist should be followed - <https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

The policy would then comply with climate change and air quality objectives.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning housing, such that it is located and designed appropriately around public transport hubs to minimise emissions and impacts on climate change. We would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy TIN1** in this regard.

POLICY D1: High quality design and place making

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 11.1 to 11.36

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

POLICY D1: High quality design and place making

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	YES	
Sound		NO
Complies with the duty to co-operate	YES	

B3 Please provide details you have to support your answers above

CPRE Hampshire welcomes the approach taken by Fareham BC towards high quality design in **Policy D1** but would like to see the inclusion of the words countryside and landscape into **Criterion (i)**. The omission of these words makes it inconsistent with **Strategic Policies DS1 and DS3** and therefore unsound.

The design quality of future developments starts with overall masterplanning and landscape context as well as specific building details. Fareham has seen a proliferation of poorly designed car dependant nondescript developments over recent years, and it is critical that major improvements are made for the future.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Include the words countryside and landscape into **Criterion (i)**.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

This would then be in accordance with **Strategic Policies DS1 and DS3**.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire has many members in Fareham who are keenly interested in the design of future developments and would like to see major improvements over previous failures in design quality, which has historically resulted in large sprawling estates of car-dependant nondescript housing.



17th December 2020

Re Fareham Local Plan

Dear Sir or Madam

I wish to comment on the above plan with respect to HA4, the housing allocation east of Downend Road. As you are aware, the most recent proposed development by Miller Homes, P20/0912/OA, was rejected on 18th November 2020.

Despite the applicants claiming that “detailed modelling” by computer software did not suggest a “severe” impact on traffic movements on Downend Road, this failed completely to relate to the lived experience of both councillors and residents.

The effects of air pollution are now well known, causing an estimated 40,000 deaths per annum. The report from the Royal College of Physicians and the Royal College of Paediatrics and Child Health in 2016 showed the devastating impact of air pollution on all age groups, beginning with life before birth and continuing into advanced years.

As you are aware, the inquest by the coroner for Inner South London into the tragic death of a nine year old girl, Ella Kissi-Debra, concluded yesterday, 16th December 2020. The coroner’s verdict was that air pollution had contributed to her death from asthma. During her lifetime, recordings near her home showed that levels of Nitrogen Dioxide had exceeded national and EU limits and the levels of particulate matter had exceeded WHO levels.

Sanctioning an increase in traffic movement close to a known pollution hotspot carries a grave burden of responsibility.

The plan therefore cannot be legally compliant with the obligation to safeguard the well-being of residents.

I urge the Council to remove HA4 from the plan.

Yours sincerely

Dr Barry Cullen

Respondent details:

Title:	Mr
First Name:	Jason
Last Name:	Cullingham
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: DS2 - Development in the Strategic Gaps

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

I believe Fareham Borough Council Plan 2037 does meet the legal requirements for plan making as the law stands, and would also appear to be mainly soundly prepared, in particular the maintenance of the existing Strategic Gaps within the Borough which supports the Prime Minister's September commitment to restore nature to 30% of the UK's land. I do not, however, think the plan is totally sound nor does it comply with any Duty to Cooperate with neighbouring Borough, eg: a) the Plan fails to be self-consistent in that, the it states (paragraph 3.4.6 refers), that there is "evidence" showing that the boundary of the Stubbington / Fareham Gap could change with little effect on the residents. On reading the evidential data provided that "evidence" would, however, appear merely to be opinion (of a planner at Hampshire County Council) and fails therefore to constitute evidence. A stronger commitment not to change the boundary or, better still, a way to positively protect it would be preferable. b) whilst the Plan appears to indicate a willingness on the part of FBC, to comply with the duty to cooperate with neighbouring Boroughs (through the Partnership for South Hampshire and other means), it should be noted that; change to the boundary of the Stubbington/Fareham Local Gap (para c) above refers), and any consequent development would also increase traffic levels in the area of the Stubbington Bypass which would negate the benefit that this roadway is planned to bring to the residents of the Gosport peninsula - an area of the country that is already recognised as one of the most deprived in the South of England. This has previously been noted by; the MP for the area, Gosport Council and a large number of the residents of both Gosport and Fareham. Continuing with development in this area would, therefore, be contrary to Fareham Borough Council's Duty to Cooperate with neighbouring councils (primarily Gosport). It is also not clear within the Plan as it currently stands that the Council would not in future allow incremental changes to the boundary of the Stubbington/Fareham Local Gap which, once commenced, would allow property developers their use as precedent to allow further, larger, building schemes. I would suggest that stronger, more positive assurances should be provided within the Plan to the effect that changes will not be made to the boundaries of the Stubbington/Fareham Local Gap without the consent of, as a minimum, Gosport Borough Council and the MP for that area. c) Although FBCs proposed increase to employment at Solent Airport (Daedalus) is to be welcomed, it is noted that the Council is primarily proposing to increase aviation based employment inclusive of an increase to the number of flights making use of the runway. It should be noted that, by continuing to target aviation related employment (inclusive of the storage and sale of Avgas fuel), the council would appear to be encouraging one of the least Green and most polluting forms of transportation. This is directly contrary to current Government policy to promote the development and use of Green Energy sources (e.g. wind power and hydrogen) and also achieve zero carbon production by 2050. It might also be noted that the Solent Airport site is currently failing to provide a positive return on the resident's investment. Rather than continuing down the) path of attempting to increase aviation related employment and the number of flights utilising the runway, FBC would better serve its residents by championing more environmentally-based employment opportunities in support of Government Climate Change policies."

What modification(s) is necessary to make the Local Plan legally compliant or sound?

a) the Plan fails to be self-consistent in that, the it states (paragraph 3.4.6 refers), that there is "evidence" showing that the boundary of the Stubbington / Fareham Gap could change with little effect on the residents. On reading the evidential data provided that "evidence" would, however, appear merely to be opinion (of a planner at Hampshire County Council) and fails therefore to constitute evidence. A stronger commitment not to change the boundary or, better still, a way to positively protect it would be preferable. b) whilst the Plan appears to indicate a willingness on the part of FBC, to comply with the duty to cooperate with neighbouring Boroughs (through the Partnership for South Hampshire and other means), it should be noted that; change to the boundary of the Stubbington/Fareham Local Gap (para c) above refers), and any consequent development would also increase traffic levels in the area of the Stubbington Bypass which would negate the benefit that this roadway is planned to bring to the residents of the Gosport peninsula - an area of the country that is already recognised as one of the most deprived in the South of England. This has previously been noted by; the MP for the area, Gosport Council and a large number of the residents of both Gosport and Fareham. Continuing with development in this area would, therefore, be contrary to Fareham Borough Council's Duty to Cooperate with neighbouring councils (primarily Gosport). It is also not clear within the Plan as it currently stands that the Council would not in future allow incremental changes to the boundary of the Stubbington/Fareham Local Gap which, once commenced, would allow property developers their use as precedent to allow further, larger, building schemes. I would suggest that stronger, more positive assurances should be provided within the Plan to the effect that changes will not be made to the boundaries of the Stubbington/Fareham Local Gap without the consent of, as a minimum, Gosport Borough Council and the MP for that area. c) Although FBCs proposed increase to employment at Solent Airport (Daedalus) is to be welcomed, it is noted that the Council is primarily proposing to increase aviation based employment inclusive of an increase to the number of flights making use of the runway. It should be noted that, by continuing to target aviation related employment (inclusive of the storage and sale of Avgas fuel), the council would appear to be encouraging one of the least Green and most polluting forms of transportation. This is directly contrary to current Government policy to promote the development and use of Green Energy sources (e.g. wind power and hydrogen) and also achieve zero carbon production by 2050. It might also be noted that the Solent Airport site is currently failing to provide a positive return on the resident's investment. Rather than continuing down the) path of attempting to increase aviation related employment and the number of flights utilising the runway, FBC would better serve its residents by championing more environmentally-based employment opportunities in support of Government Climate Change policies."

How would the modification(s) you propose make the Local Plan legally compliant or sound?

a) the Plan fails to be self-consistent in that, the it states (paragraph 3.4.6 refers), that there is “evidence” showing that the boundary of the Stubbington / Fareham Gap could change with little effect on the residents. On reading the evidential data provided that “evidence” would, however, appear merely to be opinion (of a planner at Hampshire County Council) and fails therefore to constitute evidence. A stronger commitment not to change the boundary or, better still, a way to positively protect it would be preferable. b) whilst the Plan appears to indicate a willingness on the part of FBC, to comply with the duty to cooperate with neighbouring Boroughs (through the Partnership for South Hampshire and other means), it should be noted that; change to the boundary of the Stubbington/Fareham Local Gap (para c) above refers), and any consequent development would also increase traffic levels in the area of the Stubbington Bypass which would negate the benefit that this roadway is planned to bring to the residents of the Gosport peninsula - an area of the country that is already recognised as one of the most deprived in the South of England. This has previously been noted by; the MP for the area, Gosport Council and a large number of the residents of both Gosport and Fareham. Continuing with development in this area would, therefore, be contrary to Fareham Borough Council's Duty to Cooperate with neighbouring councils (primarily Gosport). It is also not clear within the Plan as it currently stands that the Council would not in future allow incremental changes to the boundary of the Stubbington/Fareham Local Gap which, once commenced, would allow property developers their use as precedent to allow further, larger, building schemes. I would suggest that stronger, more positive assurances should be provided within the Plan to the effect that changes will not be made to the boundaries of the Stubbington/Fareham Local Gap without the consent of, as a minimum, Gosport Borough Council and the MP for that area. c) Although FBCs proposed increase to employment at Solent Airport (Daedalus) is to be welcomed, it is noted that the Council is primarily proposing to increase aviation based employment inclusive of an increase to the number of flights making use of the runway. It should be noted that, by continuing to target aviation related employment (inclusive of the storage and sale of Avgas fuel), the council would appear to be encouraging one of the least Green and most polluting forms of transportation. This is directly contrary to current Government policy to promote the development and use of Green Energy sources (e.g. wind power and hydrogen) and also achieve zero carbon production by 2050. It might also be noted that the Solent Airport site is currently failing to provide a positive return on the resident's investment. Rather than continuing down the path of attempting to increase aviation related employment and the number of flights utilising the runway, FBC would better serve its residents by championing more environmentally-based employment opportunities in support of Government Climate Change policies.”

Your suggested revised wording of any policy or text:

a) the Plan fails to be self-consistent in that, the it states (paragraph 3.4.6 refers), that there is “evidence” showing that the boundary of the Stubbington / Fareham Gap could change with little effect on the residents. On reading the evidential data provided that “evidence” would, however, appear merely to be opinion (of a planner at Hampshire County Council) and fails therefore to constitute evidence. A stronger commitment not to change the boundary or, better still, a way to positively protect it would be preferable. b) whilst the Plan appears to indicate a willingness on the part of FBC, to comply with the duty to cooperate with neighbouring Boroughs (through the Partnership for South Hampshire and other means), it should be noted that; change to the boundary of the Stubbington/Fareham Local Gap (para c) above refers), and any consequent development would also increase traffic levels in the area of the Stubbington Bypass which would negate the benefit that this roadway is planned to bring to the residents of the Gosport peninsula - an area of the country that is already recognised as one of the most deprived in the South of England. This has previously been noted by; the MP for the area, Gosport Council and a large number of the residents of both Gosport and Fareham. Continuing with development in this area would, therefore, be contrary to Fareham Borough Council's Duty to Cooperate with neighbouring councils (primarily Gosport). It is also not clear within the Plan as it currently stands that the Council would not in future allow incremental changes to the boundary of the Stubbington/Fareham Local Gap which, once commenced, would allow property developers their use as precedent to allow further, larger, building schemes. I would suggest that stronger, more positive assurances should be provided within the Plan to the effect that changes will not be made to the boundaries of the Stubbington/Fareham Local Gap without the consent of, as a minimum, Gosport Borough Council and the MP for that area. c) Although FBCs proposed increase to employment at Solent Airport (Daedalus) is to be welcomed, it is noted that the Council is primarily proposing to increase aviation based employment inclusive of an increase to the number of flights making use of the runway. It should be noted that, by continuing to target aviation related employment (inclusive of the storage and sale of Avgas fuel), the council would appear to be encouraging one of the least Green and most polluting forms of transportation. This is directly contrary to current Government policy to promote the development and use of Green Energy sources (e.g. wind power and hydrogen) and also achieve zero carbon production by 2050. It might also be noted that the Solent Airport site is currently failing to provide a positive return on the resident's investment. Rather than continuing down the path of attempting to increase aviation related employment and the number of flights utilising the runway, FBC would better serve its residents by championing more environmentally-based employment opportunities in support of Government Climate Change policies.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I am currently not convinced that, without attending, my comments would be properly taken into consideration

Respondent details:

Title:	Mrs
First Name:	Robyn
Last Name:	da Silva
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: HOUSING ALLOCATIONS (HA1, HA3-4, HA7, HA9-10, HA12-13, HA15, HA17, HA19, HA22-24, HA26-44)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Legally Compliant: FBC have not engaged sufficiently with the local community since 2017 and have repeatedly ignored responses from the community, including protest marches and a petition with sufficient signatures for a debate. The distribution of housing across the borough is disproportionate. There has been an overall reduction in the number of houses allocated across the borough, however the number of houses for HA1 has remained the same. This has resulted in an increase in the proportion of houses allocated to HA1 relative to the remainder of the borough. The local plan does not comply with the Habitats Directive. Housing on this site will not improve the integrity of designated sites. It is not clear that FBC is applying advice from Natural England correctly. Sound: HA1 is a Greenfield site. FBC are re-designating it for their own convenience. There is insufficient infrastructure to support the scale of development planned by FBC for HA1. Insufficient analysis has been done to take into account the traffic implications of 1500-2000 additional cars. Complies with Duty to Cooperate: The deal that FBC made regarding the Stubbington Strategic Gap does not appear to have been properly discussed and debated. The process is opaque.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

FBC should have qualified people prepare a plan based on proper investigation and analysis. The number of houses allocated across the borough should be proportionate and investment in infrastructure made. New housing should not be built on greenfield sites and the council should not be arbitrarily re-classifying greenfield as brownfield. Development should be looked at holistically rather than piecemeal developments by individual developers. Much more thought needs to be applied to the Nitrates issue and ensuring compliance with the advice of Natural England.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

All of the objections made would be addressed.

Your suggested revised wording of any policy or text:

All of the related points above would need to be re-worded.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Ms
First Name:	Fiona
Last Name:	Gray
Organisation: (where relevant)	Buckland Development Ltd

Agent details:

Title:	Mr
First Name:	Joseph
Last Name:	Carr
Job Title: (where relevant)	Associate
Organisation: (where relevant)	DAVID LOCK ASSOCIATES
Address:	50 North Thirteenth St
Postcode:	MK9 3BP
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Welborne, as the single largest site in the Borough, is of strategic importance to Fareham and the wider area as a whole. Buckland are committed to delivering Welborne and the aspirations of the Welborne Plan, as set out in the outline planning application. However, as you will be aware, the draft planning conditions associated with the proposed planning permission include a condition which restricts development at Welborne until funding for the M27 J10 has been secured. The Welborne Outline Planning Application commits £20m of developer funding to the junction improvements. Since the planning committee in October 2019, the funding situation has worsened, with c. £30m of government funding now being reallocated to other schemes in the region. This leaves an estimated funding gap of c.£50m. Therefore, despite planning permission being imminent, development at Welborne cannot occur until this significant hurdle is overcome. Whilst Buckland generally support the Council's position to not revisit the detailed policies of the Welborne Plan, and consider it sound, consideration must be given to methods to unlock delivery at Welborne, especially given Welborne's role in the development plan, and its importance in ensuring the development plan is sound. Given the need to deliver substantial infrastructure to support the community, opportunity to reduce the costs of this infrastructure is low. Reviewing the policies and requirements of the Welborne Plan, the only opportunity which gives flexibility to reinvest further development receipts into M27 J10 is to provide 10% affordable housing in the initial phases of development. However, even at lower affordable housing levels within the parameters of Welborne Plan policy (with a minimum requirement of 10% affordable housing and a viability review process to increase affordable housing later in the development programme), Welborne cannot viably support funding an increased M27 J10 contribution. This is evidenced in the viability work undertaken as part of the outline planning application, as presented to planning committee in October 2019, which states that Welborne can only support 10% affordable housing in the initial phases with £20m of developer funding. Should the developer funding increase, the amount of affordable housing which Welborne could viably support will reduce accordingly. Whilst discussions are ongoing with FBC on methods to overcome these obstacles to Welborne's delivery, consideration must be given to methods to increase flexibility to enable Welborne to be able to deliver homes. This could be through edits to the Welborne Plan requirements, or through the removal of the condition which restricts development at Welborne until funding for the M27 J10 has been secured. This would enable development to start on site, whilst further funding was sought. The need to unlock delivery at Welborne is paramount, as Welborne is critical to achieving the short- and long-term aspirations of this Local Plan, with a large proportion of FBCs housing requirement (and employment floorspace) expected to be delivered at Welborne within the plan period to 2037. Therefore, Welborne's delivery is crucial to enable the development strategy of this plan to be considered justified and effective, which is imperative for the plan as a whole to be considered sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

If required by the Inspector, Buckland are available to attend, and contribute to the local plan examination as required, to support the continued allocation at Welborne.

2) Policy: DS3 – Landscape

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We support the designation of the land to the east of Welborne as a special landscape area (under draft Policy DS3), which is reflective of its local importance and, due to the area's topography, prevents the visual encroachment of the urban area to the open countryside to the north of FBCs administrative boundary. We consider this approach to be both legally compliant and sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Paragraph: 9.3

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We support the position outlined in paragraph 9.30 of the draft plan, in relation to Biodiversity Net Gain requirements, as Buckland are in the process of agreeing a bespoke biodiversity enhancement strategy with FBC, following the provisions of the Welborne Plan. This Strategy which will reflect commitment to the delivery of significant biodiversity enhancement at Welborne, through its comprehensive network of open space and SANGs. Furthermore, it is important to note that these Biodiversity Net Gain requirements are yet to be legislated at a national level, and thus exact provisions and expectations are yet to be set out by Government. Thus, it could be questioned whether Policy NE2 is in fact premature, although this may be resolved depending on the time this plan is examined, and thus can be reviewed in this context by the Inspector at a later date.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Paragraph: 10.27

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We would wish to support the viability work which has been undertaken by the Council to underpin this Local Plan. We particularly support the recommendation that a zero CIL rate should be applied to Welborne, given the scale of infrastructure contribution to be provided through the Welborne S106 agreement, and the viability discussions which have been undertaken as a part of the Welborne Outline Planning Application

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Gayle Wooton
Fareham Borough Council
Civic Offices
Civic Way
Hampshire
PO16 7AZ

18th December 2020

BDL010 / JGC

Dear Gayle

**FAREHAM DRAFT LOCAL PLAN 2037 – PUBLICATION
VERSION**

Response on behalf of Buckland Development Limited

We are pleased to respond to the above consultation on behalf of our clients, Buckland Development Ltd (Buckland). As you are aware, Buckland are the promoters and development managers of Welborne. The Outline Planning Application for Welborne was submitted in March 2017 and is expected to be determined imminently, with reserved matters applications and construction to follow in the coming years. It is in this context we write to respond to the above consultation. We have also responded to the online questionnaire with answers supporting the points raised below.

Welborne, as the single largest site in the Borough, is of strategic importance to Fareham and the wider area as a whole. Buckland are committed to delivering Welborne and the aspirations of the Welborne Plan, as set out in the outline planning application. However, as you will be aware, the draft planning conditions associated with the proposed planning permission include a condition which restricts development at Welborne until funding for the M27 J10 has been secured. The Welborne Outline Planning Application commits £20m of developer funding to the junction improvements.

Since the planning committee in October 2019, the funding situation has worsened, with c. £30m of government funding now being reallocated to other schemes in the region. This leaves an estimated funding gap of c.£50m. Therefore, despite planning permission being imminent, development at Welborne cannot occur until this significant hurdle is overcome. Whilst Buckland generally support the Council's position to not revisit the detailed policies of the Welborne Plan, and consider it sound, consideration must be given to methods to unlock delivery at Welborne, especially given Welborne's role in the development plan, and its importance in ensuring the development plan is sound.

Given the need to deliver substantial infrastructure to support the community, opportunity to reduce the costs of this infrastructure is low. Reviewing the policies and requirements of the Welborne Plan, the only opportunity which gives flexibility to reinvest further development receipts into M27 J10 is to provide 10% affordable housing in the initial phases of development. However, even at

DAVID LOCK ASSOCIATES LIMITED

50 North Thirteenth Street
Central Milton Keynes
Buckinghamshire
MK9 3BP

☎ +44 (0) 1908 666276

✉ mail@davidlock.com

💻 www.davidlock.com

VAT Reg. No. 486 0599 05.
Registered in England No. 2422692.
Registered Office as above.

lower affordable housing levels within the parameters of Welborne Plan policy (with a minimum requirement of 10% affordable housing and a viability review process to increase affordable housing later in the development programme), Welborne cannot viably support funding an increased M27 J10 contribution. This is evidenced in the viability work undertaken as part of the outline planning application, as presented to planning committee in October 2019, which states that Welborne can only support 10% affordable housing in the initial phases with £20m of developer funding. Should the developer funding increase, the amount of affordable housing which Welborne could viably support will reduce accordingly.

Whilst discussions are ongoing with FBC on methods to overcome these obstacles to Welborne's delivery, consideration must be given to methods to increase flexibility to enable Welborne to be able to deliver homes. This could be through edits to the Welborne Plan requirements, or through the removal of the condition which restricts development at Welborne until funding for the M27 J10 has been secured. This would enable development to start on site, whilst further funding was sought.

The need to unlock delivery at Welborne is paramount, as Welborne is critical to achieving the short- and long-term aspirations of this Local Plan, with a large proportion of FBCs housing requirement (and employment floorspace) expected to be delivered at Welborne within the plan period to 2037. Therefore, **Welborne's delivery is crucial to enable the development strategy of this plan to be considered justified and effective, which is imperative for the plan as a whole to be considered sound.**

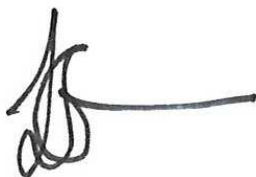
On more specific matters, we support the designation of the land to the east of Welborne as a special landscape area (under draft Policy DS3), which is reflective of its local importance and, due to the area's topography, prevents the visual encroachment of the urban area to the open countryside to the north of FBCs administrative boundary. We consider this approach to be both legally compliant and sound.

We also support the position outlined in paragraph 9.30 of the draft plan, in relation to Biodiversity Net Gain requirements, as Buckland are in the process of agreeing a bespoke biodiversity enhancement strategy with FBC, following the provisions of the Welborne Plan. This Strategy which will reflect commitment to the delivery of significant biodiversity enhancement at Welborne, through its comprehensive network of open space and SANGs. Furthermore, it is important to note that these Biodiversity Net Gain requirements are yet to be legislated at a national level, and thus exact provisions and expectations are yet to be set out by Government. Thus, it could be questioned whether Policy NE2 is in fact premature, although this may be resolved depending on the time this plan is examined, and thus can be reviewed in this context by the Inspector at a later date.

Finally, we would also wish to support the viability work which has been undertaken by the Council to underpin this Local Plan. We particularly support the recommendation that a zero CIL rate should be applied to Welborne, given the scale of infrastructure contribution to be provided through the Welborne S106 agreement, and the viability discussions which have been undertaken as a part of the Welborne Outline Planning Application.

We look forward to formal confirmation that these comments have been received and processed. We also look forward to the opportunity to comment on the further phases of consultation on this plan, and are available to attend, and contribute to the local plan examination as required. If you have any questions or queries regarding the points raised in this letter, please do not hesitate to be in touch with me at your earliest convenience.

Yours sincerely



JOSEPH CARR
Associate

encs

cc.

Lee Smith	FBC
Rachael Hebden	FBC
Mark Thistlethwayte	BDL
John Beresford	BDL
Fiona Gray	BDL
Paul Willoughby	BDL

Respondent details:

Title:	Mr
First Name:	Peter
Last Name:	Davison
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: CC4 - Renewable and Low Carbon Energy

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Fareham's agreed climate emergency policy requires the council to take into account "proactively using local planning powers to accelerate the delivery of net zero carbon new developments and communities" The publication local plan only passively considers net zero carbon new developments instead of driving them as required by their policy. Not only does this make the plan not legally compliant, it is also unsound in the light of current climate change knowledge.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Development of new buildings should require them to be carbon neutral. Where this is not possible for a specific building, then the neighbouring buildings should compensate by being carbon negative.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

The modifications bring the plan in line with Fareham's climate change policy.

Your suggested revised wording of any policy or text:

I will leave this to others more skilled in writing policies.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Climate change issues are so important to all our futures, I would like to make sure that Fareham takes this issue seriously.

Respondent details:

Title:	Mr
First Name:	Simon
Last Name:	Dawkins
Organisation: (where relevant)	New River Retail

Agent details:

Title:	Mr
First Name:	Peter
Last Name:	Keenan
Job Title: (where relevant)	Director
Organisation: (where relevant)	Q A Planning Ltd
Address:	1 Mortimer Street, London
Postcode:	W1T 3JA
Telephone Number:	
Email Address:	

1) Policy: R1 - Retail Hierarchy and Protecting the Vitality and Viability of Centres

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

This policy includes a general approach to the hierarchy of centres, consistent with paragraph 85a of the NPPF. However, the policy is silent on the ability of centres to deliver residential. Paragraph 85d states that policies should 'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.' It is appreciated that the draft plan allocates two residential sites within Locks Heath district centre and in other centres and indeed paragraph 7.8 makes a passing reference to the appropriateness of residential in town centres. Given the importance of delivering sustainable residential development on brownfield sites, in our view the policy needs to be stronger on the in-principle support given to residential development in town centres. As the impact of Covid-19 and the wider macro-economic pressures on town centres is felt, there will be other development opportunities that present themselves as 'windfall' sites and providing a clear policy steer to develop under-utilised land in town centres for residential will improve the effectiveness of the policy, consistent with the NPPF. Therefore, we propose that the policy is strengthened to provide a clear commitment to support residential on appropriate sites within town centres.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reference to the potential for residential within town centres to be included within the policy wording itself

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would ensure consistency with national policy and improve its effectiveness to ensure delivery of housing in sustainable brownfield locations,

Your suggested revised wording of any policy or text:

'Residential development on appropriate sites in designated town centres will be supported subject to compliance with other policies within this plan'.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

New River Retail own one of the district centres and its expertise will assist at the hearing sessions.

2) Policy: HA36 - Locks Heath District Centre

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

NRR support the principle of the proposed housing allocation. NRR are also currently consulting on the changes to the highways infrastructure that would be required to facilitate the delivery of this site, which could be brought forward quickly if the application is approved. This would fulfil part (g) of the draft policy. NRR's only request is to ensure that sufficient flexibility is built into the policy to allow for future applications to adapt their design to make the best use of this brownfield land and therefore improve its effectiveness. The policy provides for 30 dwellings and a maximum height of 3 storeys on this site. Contextually, it is noted that the NPPF encourages the following: Para 111 states policies should 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups...' Para 123: '..important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site' Para 123a 'policies...include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate; To make the best use of land in a sustainable location, then a design led approach needs to be taken which makes the best use of land taking into account the context of the site. It is noted the policy provides an indicative dwelling yield and height limit. We would not wish to prejudge the eventual design solution on the site but note that the existing shopping centre exceeds 3 storeys and has buildings in different land uses. Whilst a simple 'storey height' limit is a helpful guide, when considering adjacent buildings, it is important to consider the roof pitch, floor to ceiling height and finished floor levels. As such, a well-designed building that exceeds 3 storeys should not be resisted if it makes the best use of land and relates well to the surrounding area. This in turn could potentially result in a higher dwelling yield.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Policy revised to ensure flexibility in design

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would improve its effectiveness and ensure consistency with national policy.

Your suggested revised wording of any policy or text:

The change proposed is as follows: a 'The quantity of housing proposed shall be broadly consistent with the indicative site capacity, unless a design led solution can justify a higher quantum c 'Building heights should be a maximum of 3 storeys, or should not exceed the height of the existing shopping centre' In our view, this does not change the fundamental aims of the allocation but delivers a degree of flexibility to ensure that any developments make the best use of land.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

New River Retail are promoting the site for development and whilst it supports the principle subject to policy wording changes, its presence at the hearing session would be beneficial to both answer questions from the Inspector and it advance its case for the changes.

3) Policy: HA37 - Former Locks Heath Filing Station

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

NRR support the principle of the proposed housing allocation. NRR are also currently consulting on the changes to the highways infrastructure that would be required to facilitate the delivery of this site, which could be brought forward quickly if the application is approved. This would fulfil part (g) of the draft policy. NRR’s only request is to ensure that sufficient flexibility is built into the policy to allow for future applications to adapt their design to make the best use of this brownfield land and therefore improve its effectiveness. The policy provides for 30 dwellings and a maximum height of 3 storeys on this site. Contextually, it is noted that the NPPF encourages the following: Para 111 states policies should ‘promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups...’ Para 123: ‘..important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site’ Para 123a ‘policies...include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate; To make the best use of land in a sustainable location, then a design led approach needs to be taken which makes the best use of land taking into account the context of the site. It is noted the policy provides an indicative dwelling yield and height limit. We would not wish to prejudge the eventual design solution on the site but note that the existing shopping centre exceeds 3 storeys and has buildings in different land uses. Whilst a simple ‘storey height’ limit is a helpful guide, when considering adjacent buildings, it is important to consider the roof pitch, floor to ceiling height and finished floor levels. As such, a well-designed building that exceeds 3 storeys should not be resisted if it makes the best use of land and relates well to the surrounding area. This in turn could potentially result in a higher dwelling yield.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Revision to the policy conditions to ensure there is flexibility in design

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would ensure consistency with national policy and the effectiveness of the policy

Your suggested revised wording of any policy or text:

The change proposed is as follows: a ‘The quantity of housing proposed shall be broadly consistent with the indicative site capacity, unless a design led solution can justify a higher quantum c ‘Building heights should be a maximum of 3 storeys, or should not exceed the height of the existing shopping centre

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

New River Retail and promoting this site for development and support its allocation subject to changes to the wording to ensure flexibility. Its appearance would benefit the Inspector to answer questions and in order to advance its case for the changes.

4) Policy: HP5 - Provision of Affordable Housing

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

It is noted that this policy states that 35% of housing will be affordable on brownfield sites and in the case of sites located within the defined Fareham town centre boundary, it will only be 20% of dwellings. This level is based on the Local Plan Viability Assessment (2019), which in respect of Fareham town centre states: Discussion with the council has identified a number of recent schemes where both CIL liable and non-CIL liable schemes in Fareham town centre in particular have struggled to deliver and when coming forward have provided less than policy compliant affordable housing for viability reasons. For consistency, we consider that the approach should also apply to all other sites within the designated town and district centres.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Refer to other centres

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would ensure consistency with the evidence base


Your suggested revised wording of any policy or text:

We propose that the 20% level also applies to other sites within defined the defined district centres

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr.
First Name:	Gordon
Last Name:	Dedman
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: TIN4 - Infrastructure Delivery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

As I have previously addressed and advised, the HA4 plan conflicts with the 2008 Ambient Air Quality Directive. There is nothing in the plan for the additional infrastructure required to support the increase in traffic that can be expected at the junction of Downend Road and the A27. With a school at that junction, the increase in air pollution can only be harmful to the students. Local authorities have a fundamental role in leading the coordination and delivery of infrastructure that will support their areas. Effective infrastructure planning, prioritisation and governance of spend are critical to supporting the delivery of sustainable development and growth and in this case, it is lacking.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Proper infrastructure put in place. As I have previously suggested, the traffic should be directed away from the junction.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would effectively ensure the plan meets the requirements.

Your suggested revised wording of any policy or text:

The 2008 Ambient Air Quality Directive needs to be adhered to.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Miss
First Name:	Tamsin
Last Name:	Dickinson
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA1 - North and South of Greenaway Lane

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Insofar as commentary on this Plan is strictly limited to narrow technical issues of legal compliance, and consistency with national policy, both of which require technical knowledge beyond that of most residents, I believe the very process of limiting consultation in this way is not in the spirit of the laws meant to provide for openness and ease of access for residents. My representations are filed as pertaining to development HA1, but in so far as the other policy areas impact this development, my comments should be duly noted across many of the policy areas, of which the web form only allows you to choose one. Legal Compliance The council has a duty to use a variety of methods to obtain community input (Para 1.5). For the first time to my knowledge, vast numbers of residents were not sent paper copies of the Plan (this has been precedent until now), and as such many residents were unaware or unable to comment. Moreover, Warsash Residents Associations were never consulted with respect to the housing allocations, which is contrary to Paragraph 66 of the NPPF. HA1 did not feature in the 2015 Local Plan, and paragraph 1.16 confirms that this plan is extant, and that the LPA should consider allocations made in the previous adopted plan. Para 4.19 Housing policies HA(2,5,6,8,11,14,16,18,20,21,25) are no longer proposed allocations, so why was HA1 singled out as an allocation and how was the Objectively Assessed Housing Need arrived at for this site? The new proposed Plan then goes on to ignore the 2015 Plan by stating HA1 will provide for these allocations without any due formal adoption of the 2017 Plan. Developers have taken advantage of the unadopted 2017 Plan by citing it as a reason to get approval, and some have been granted on this premise. Furthermore, the site has been extended to increase the boundaries of development even further than the unadopted 2017 Plan. HA1 is responsible for 62% of the housing allocations in the borough, (excluding Welbourne) , with no overarching master plan to deal with the pressures on community infrastructure. By actively allowing individual applications to determine the total extent of development, I believe FBC is absolving itself of responsibility to ensure community services are well catered for and commensurate with the increase in housing being proposed. Para 9.10 states the LPA is aspiring to Nitrate Neutrality. Strategic Policy NE1 requires designated sites be protected and ENHANCED. Likewise Para 9.50 (Policy NE4) confirms permissions will be granted when the integrity of designated sites be maintained or IMPROVED. On Page 199 Para 9.54 indicates that proposals for development should provide a net REDUCTION in eutrophication for designated sites in an unfavourable condition. The LPA's approach therefore contravenes both the Habitats Directive and the Publication Plan in respect of these policies. It is the responsibility of the LPA to fulfil its legal obligations and satisfy themselves beyond scientific doubt, that adverse effects on the designated SAC, SPA and RAMSAR sites, from harmful nutrients generated by new residential development, has been mitigated (rather than compensated). There is doubt that the LPA is applying the Natural England advice correctly and lawfully in this respect. Soundness Policy HA1 (currently a Greenfield site), is proposed to be re-designated as an urban area (via the re-definition of Settlement Boundaries ref. WW17). Para 2.10 states Fareham Borough will retain its identity, valued landscapes and settlement definition and will protect its natural, built and historic assets. The re-designation of the Policy HA1 to urban status and the movement of the Settlement Boundary to encompass it, is a blatant subversion of the settlement principle above, and moreover it seems has been done in a less than transparent manner to enable this development. Strategic Policy DS1 (Paras 5.6 and 3.36) deals with the need (in exceptional circumstances and where necessary and justified) for residential development in the countryside on previously developed land. Additionally, Policy HP1 calls for the efficient use of existing buildings to meet such need on a one-for one replacement dwelling basis. These conditions do not apply to HA1 and therefore it seems the "convenient" alternative was for FBC to redraw the urban boundary with no consultation. Policy HP4 (Para 5.24) HA1 fails to meet criteria e) as the proposal would demonstrably have unacceptable environmental, amenity and traffic implications. Policy HA1: Page 51 refers to traffic routes and despite recommendation to limit access to 6 dwellings on Greenaway Lane, the plan proposes for up to 140 dwellings to use this as access through a widening of the Lane. This will result in a considerable negative impact on the character of the lane and to the safety of its non-vehicular users. In general, Page 54 suggests 7 new accesses onto the already very busy Brook Lane and Lockswood Road, as well as one additional access at Brook Lane, via 3 entry points from Greenaway Lane. Infrastructure Para 10.15 Transport plan does not include an analysis of streets where the majority of the houses are proposed. Why, when there are 830 new dwellings proposed, hasn't more consideration been given to HA1 in the transport assessment. With an average of 2 cars per dwelling, an additional 1660 vehicles will be on local roads and there is no reference for the mitigation required to reduce congestion by 2037. The Plan fails the Test of Soundness by not being Positively Prepared in this respect. Para 10.14 The Local Plan Strategic Transport Assessment at Para 14.16 reads; "In conclusion, based on the work of this Strategic Transport Assessment, it is considered that the quantum and distribution of the development proposed in the Fareham Local Plan, and the resulting transport impacts, are capable of mitigation at the strategic level, and that the plan is therefore deliverable and sound from a transport perspective." This statement doesn't include the area HA1, of the local plan with 830 homes and isn't assessed within the The Local Plan Strategic Transport Assessment document. Para 7.13 Local retail/commercial facilities figures do not cater for the additional houses in Warsash. For example, no additional convenience goods floor space has been allocated to Warsash. Facilities Para 7.18 Out of town shopping is discussed, but not defined; Out of town shopping will take jobs and customers away from local shopping areas and will increase traffic on the routes in and out of Warsash and Locks Heath. Para 10.26 Infrastructure Delivery Plan Section 5.4 Education is planned with HCC but the period of any proposed extensions for child placements is only up to 2021 whereas the Plan covers up to 2037. This is not a sound approach for the education of our children. Education Para 10.27 Infrastructure Delivery Plan Table item 83 calls for section 106 provisions of additional Early Years Foundation Provision (EYP) within the Western Wards however HA1 does not indicate the placement of a nursery or pre-school within the development area. Where is the child placement contribution to be allocated as the IDP calls for the addition of 83 placements whereas there are over 1000 new dwellings being proposed for the Warsash area alone. Moreover, no allowances have been made for secondary schooling, which is at capacity in the area and is already subject to detrimental policy changes to the catchment

Please provide details you have to support your answers above

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Detailed long term infrastructure planning for the community to include retail, parking, schools, GP's, traffic measures commensurate with a 2037 timeline and which requires FORMAL community consultation at regular intervals. Lessening of proposed number of dwellings to maintain some green space in the village and improve living conditions for all residents, old and new. Requirement to have an integrated plan, not a one by one for individual developers, which lessens community funds and doesn't account for the cumulative impact on the village.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

as above

Your suggested revised wording of any policy or text:

as above


If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Ms
First Name:	Mary
Last Name:	Dwyer-Parker
Organisation: (where relevant)	[No Reply]

Agent details:

Title:	Mr
First Name:	Robert
Last Name:	Tutton
Job Title: (where relevant)	Director
Organisation: (where relevant)	Robert Tutton Town Planning Consultants Ltd
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: URBAN AREA BOUNDARY (DS1)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Residential development stands on both sides of Botley Road, Burrridge and the locality 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 Burrridge, by demarcating the Defined Urban Settlement Boundary in such a manner as to include the west side of Botley Road. [A drawing showing the suggested DUSB will be presented shortly under separate cover.]

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Include both sides of Botley Road in the Defined Urban Settlement Boundary

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would recognise that Botley Road is a 'substantially built-up area' rather than countryside.

Your suggested revised wording of any policy or text:

n/a

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Fareham Borough Council has failed to recognise the 'substantially built-up' character of Burr ridge since 2012.

Respondent details:

Title:	Ms
First Name:	Fiona
Last Name:	Earle
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 1.5

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Paper based document Fareham Today Local Plan Special edition Autumn 2020 was not delivered to all households in Fareham. I received mine 2 weeks after the consultation had started & only because I completed an online form to report it missing

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Public needs to be consulted again so they are aware the process is being carried out

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Completing this structured online form is beyond the time constraints and knowledge base of the layman. There are hundreds of pages of documents to absorb & comment upon

Your suggested revised wording of any policy or text:

Public needs to be consulted again so they are aware the process is being carried out

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: DS1 - Development in the Countryside

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Objects to the both the wording of Policy HP4 and the link to DS1 policy as it implies that if Fareham's five year housing supply is not met, the first area of search is outside of the urban area boundary.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The policy should refer to sites within urban areas, brownfield land, underutilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Prevent building on the countryside

Your suggested revised wording of any policy or text:

No proposal to amend the wording of Policy HP5 only that the link included in DS1 is removed

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Policy: DS1 - Development in the Countryside

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Policy HP6 is not robust enough to stop development in the countryside

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The development of Rural Exception sites will not be permitted in areas designated as 'Special Landscape character' and the development will only be permitted where all criteria a-e are met

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Prevent building in the countryside

Your suggested revised wording of any policy or text:

The development of Rural Exception sites will not be permitted in areas designated as 'Special Landscape character' and the development will only be permitted where all criteria a-e are met

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA32 Housing allocation is undeliverable, it is also in an area this plan designates as special landscape character countryside & therefore should not be included.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 housing allocation from the Draft plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

The site is undeliverable as there is no established right of way to the public Highway, removing HA32 would prevent an undeliverable site being included in the development plan.

Your suggested revised wording of any policy or text:

Remove HA32 housing allocation from the Draft plan

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The site is currently subject to the beginning of a Judicial review case, FBC have consistently ignored residents statements that the site is not deliverable for a number of reasons including: 1) Lack of road access. The red line of the approved outline planning permission does not reach a public Highway, therefore that planning application and its approval are unlawful. 2) Inaccurate Nitrate calculations for nitrate mitigation, occupancy figure of 2.4 people is being used for large 5 bedroom houses. The site applicants position as chair of the local Conservative Club has rendered decision making by FBC in relation to this site biased and residents need an impartial judgement to take place on the inclusion of this site in the local plan.

5) Policy: HA1 - North and South of Greenaway Lane

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Many Planning Applications for HA1 are already in place. The HA1 masterplan included in this plan is not being followed. The greenspaces are not being kept. This whole area was designated countryside in the last development plan. The supporting documents prove residents claims the areas roads, schools & healthcare can not accommodate additional population of this density

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reduce the housing allocation in the HA1 area to a level the local infrastructure can accommodate

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Create sustainable development

Your suggested revised wording of any policy or text:

HA1 be reduced to total of 500 houses

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

From: EHDC - Local Plan <LocalPlan@easthants.gov.uk>
Sent: 30 November 2020 10:12
To: Planning Policy
Subject: RESPONSE: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Dear Planning Policy

Policy HP11 Gypsies, Travellers and Traveller Showpeople

There is a widely acknowledged national shortage of suitable accommodation for Travellers. The historic failure to provide accommodation has led to overcrowding and many unauthorised encampments. It is the view of EHDC that Council's should make every attempt to meet needs, in order to contribute to lessening the impacts on the Traveller community of a lack of suitable accommodation, and to lessen the impact on settled communities when unauthorised encampments occur. Equally, it is the responsibility of Councils to lead the way on equalities, neutralising language, and ensuring inclusivity.

We would therefore like to suggest the removal of the frequently used term "lawful" in this section of the Local Plan, unless that is equally used in reference to bricks and mortar housing. We would also encourage a review of the text to ensure that Traveller accommodation is always being referred to (the land use itself) rather than Travellers themselves. We would particularly encourage removal of any sentence that suggests a person can be lawful or unlawful.

With regards to the policy itself, we have one key comment, relating to the policy's first requirement that any proposal for Traveller sites must be able to show an identified need or personal circumstances that warrant a need. This does not appear to be compliant with the national planning policy (Planning Policy for Traveller Sites, PPTS) and is not consistent with the approach to bricks and mortar housing. The national policy is such that, proposals that are suitable in planning terms for Traveller accommodation (or any housing) are permitted regardless of need. Bricks and mortar housing in sustainable locations is still supported by national planning policy even if housing numbers have been met - there is equally no ceiling approach to Traveller accommodation. We suggest that this criterion should be reviewed to ensure compliance with PPTS.

With regards to meeting need, we note that the GTAA 2017 identified a need for 2 pitches from unknown households, but when the 10% approach is applied, that equates to 0 provision. We also note that the response rate for Fareham to interviews was 37.5%, one of the fewest by area, and that only 67% meet the planning definition. We would therefore contend that the Council is meeting the minimum number of pitches, and that the need is likely to be much higher. The lack of acknowledgement of this likely need, especially from unknowns, is what can cause pressure during the plan period in areas that may not be suitable for accommodation, and in other districts/boroughs. We would encourage the Council to relook at this, and see if further suitable provision can be made. The GTAA is dated 2017, and the consultation document states, " It is anticipated that an updated GTAA will be undertaken during the plan period." - instead, we would suggest that an updated GTAA should support the submission version of the Fareham Local Plan 2037, as it is now 3 years old, and only had a 37.5% response rate.

Kind regards

The Planning Policy team

PLANNING
AWARDS 20
FINALIST



FIND OUT MORE AT
WWW.EASTHANTS.GOV.UK



Keely, Lauren

From: Local Plan <Local.Plan@eastleigh.gov.uk>
Sent: 18 December 2020 17:13
To: Planning Policy
Cc: Local Plan
Subject: Eastleigh Borough Council response

Dear Sir/Madam,

Thank you for consulting Eastleigh Borough Council on the Publication Version of the Fareham Local Plan. This Council continues to recognise the importance of collaborative working as reflected in meetings held with Council officers and work undertaken through the Partnership for South Hampshire (PFSH).

We note the annual housing target has been reduced from 514 dwellings per annum (dpa) to 403 dpa to reflect the Government's proposed changes to the standard methodology. We also note that the timing of the submission of the Plan to the Secretary of State for examination is subject to the precise wording of the Government policy, and therefore, the outcome of the Government's consultation on 'Changes to the current planning system' and further changes which could be proposed to the standard methodology.

Should any further changes be introduced to the standard methodology by the Government in following up this consultation, this Council would expect the proposed housing numbers to be revisited and subjected to further consultation. This should include a reconsideration of the potential South of Fareham Strategic Growth Area (SGA), an area of land located to the west of Downend Road (which would have formed a wider North of Downend SGA) and other significant housing allocations in the Plan. Adopting such a proactive approach to the provision of new homes across Fareham Borough would also contribute towards meeting wider unmet housing needs across the PFSH sub-region which are currently being addressed through a review of the PFSH strategy.

This Council continues to welcome the contribution of the proposed employment allocations for meeting both local and wider strategic employment needs. The sub-regional importance of the Solent Enterprise Zone at Daedalus also continues to be recognised in terms of the wider employment, skills and training opportunities this will continue to provide. However, we would welcome a reference in the Plan to the 'cities first' approach supported by PFSH in reflecting the cities as the main focus for new office development across the sub-region.

I trust this is of assistance. Please do not hesitate to contact us if you have any queries with regards to our response.

Yours faithfully

The Planning Policy Team




Keep
Eastleigh
SAFE**Keep washing
your hands****Maintain social
distancing****Wear face
coverings where
appropriate**hants.gov.uk/coronavirus

This email is subject to recording and/or monitoring. Any content or attachments are for the person to whom it is addressed and may be confidential.

If you get it by mistake, please email us back as soon as possible, and then delete it from your system; please do not pass it on to anyone else or use the information in it.

We do our best to guard against viruses. If you get a virus, we cannot accept liability for any damage.

You should carry out your own virus check before you open attachments.

Eastleigh Borough Council

From: Planning Policy <PlanningPolicy@fareham.gov.uk>

Sent: 06 November 2020 15:47

Subject: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Dear Sir or Madam,

Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Fareham Borough Council is launching the next stage of its consultation on the new Local Plan 2037. The Council is inviting comments on its Publication Local Plan which it intends to submit to the Secretary of State for independent examination.

The Fareham Local Plan 2037 will cover the Borough of Fareham excluding the area covered by Local Plan Part 3: the Welborne Plan. The Fareham Local Plan 2037 will set out the development strategy and policy framework for Fareham and once adopted, will be used to guide decisions on planning applications up to 2037. The Publication Plan, which the Council is now consulting on, includes the vision for the Borough, the overall strategy that directs the location of development, the sites that have been identified for development in the Borough, the policies that will be used to make decisions on planning applications, and how the plan will be monitored.

The Publication Plan is accompanied by a policies map which shows the policy allocations and designations.

Where to view the proposed submission documents:

The Publication Plan, the proposed submission documents and the relevant evidence base will be available for inspection from 6 November 2020 until 18 December 2020:

- a. on the Council's website at <https://www.fareham.gov.uk/localplanconsultation>
- b. subject to Covid 19 restrictions, by prior appointment at the Fareham Borough Council Offices during office hours:

Office opening hours (excluding Bank Holidays) are:

Monday to Thursday 8.45 a.m. to 5.15 p.m.

Friday 8.45 a.m. to 4.45 p.m.

The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020^[1] temporarily removes the requirement to provide hard copies of Local Plan documents for inspection in Council offices and other public locations in the Borough, in response to the coronavirus pandemic.

Period of publication for representations:

The Council will receive representations on the Fareham Local Plan 2037 for a six-week period which runs from **6 November 2020 until 11.59pm on 18 December 2020**. As set out in the Town and Country Planning (Local Planning) (England) Regulation 20 (2), **any representations must be received by the date specified**.

How to make representations:

Representations can be made through the following means:

- Online: By using the Council's online response form at <https://www.fareham.gov.uk/localplanconsultation>
- Emailing your response to planningpolicy@fareham.gov.uk
- Paper copies of the response form are available upon request by telephoning 01329 824601.
- Paper copy response forms should be sent to the Consultation Team, Fareham Borough Council, Civic Offices, Civic Way, Fareham, PO16 7AZ and must be received within the six-week consultation period stated above.

Content and structure of representations

Following the consultation period, the Local Plan will be submitted for examination by an independent Planning Inspector, appointed by the Secretary of State. The Inspector's role is to examine whether the submitted plan meets the tests of soundness (as defined in the National Planning Policy Framework paragraph 35) and meets all the relevant legislative requirements, including the duty to co-operate.

The Planning Inspector will consider representations made during this period of consultation. Any comments on the Publication Plan should specify the matters to which they relate and the grounds on which they are made.

Only the following matters will be of concern to the Planning Inspector:

- **Legal Compliance** – does the plan meet the legal requirements for plan making as set out by planning and environmental laws?
- **Soundness** – has the plan been positively prepared, is it justified, effective, and consistent with national policy?
- **Meeting the Duty to Cooperate** – has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

The Council has produced a Special Edition of its Fareham Today publication to help those wishing to respond to the consultation.

Request for further notification of Local Plan progress

When making a representation you can ask to be notified at a specified address of any of the following:

- Submission of the Fareham Local Plan to the Secretary of State for examination
- Publication of the recommendations of the person appointed to carry out the independent examination of the Fareham Local Plan on behalf of the Secretary of State
- Adoption of the new Fareham Local Plan

It is important that the Planning Inspector and all participants in the examination process are able to know who has given feedback on the Publication Plan. All comments received will therefore be submitted to the Secretary of State and considered as part of a public examination by the Inspector. In addition, all comments will be made public on the Council's website, including the names of those who submitted them. All other personal information will remain confidential and will be managed in line with the Council's Privacy Statement.

The Examination Process

The examination is open to the public. Subject to the venue's seating availability, anyone can attend to listen to the discussions but there are strict rules which apply to those who wish to participate. If you wish to appear at the examination as a participant, such a request must be made as part of the representation on the Publication Plan. The right to appear and be heard by the Inspector at a hearing session is defined in the Planning and Compulsory Purchase Act 2004 section 20 (6).

Kind regards

Planning Strategy
Fareham Borough Council
01329824601




This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

^[1] <https://www.legislation.gov.uk/ukxi/2020/731/introduction/made>

Respondent details:

Title:	Mr
First Name:	Michael
Last Name:	Edwards
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: GYPSIES, TRAVELLERS & TRAVELLING SHOWPEOPLE (HP11, HA45)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

1. The Publication Plan is not legally compliant as absolutely no individual notice has been given to properties that may be affected, as per normal planning procedures. I live directly opposite the proposed Gypsy Pitches under Housing Policy HA45. I was completely unaware of this proposal until pointed out to me by Burrridge and Swanwick Resident Association last week. This policy will directly affect the quality of life and the value of my property and yet FBC has not seen fit to consult myself or my neighbours. 2. The Plan is not sound. There are two principal issues a) the suitability of the site ; b) The stated need. a) Suitability of the site: Planning permission for the current onsite gypsy pitch was rejected by FBC. At that time FBC stated that " the development would be incongruous in this location, reduce the undeveloped space between buildings in the countryside and diminish the openness of the land to the detriment of the rural character of the area. The site is , as stated, in countryside and it is against FBC policy to permit development in such areas. FBC concluded that the siting of a gypsy pitch in Burrridge Road was counter to Policies CS4, CS19, CS20 and saved Policy CS18. The propose site is on marshy grassland, which would make building an infrastructure of services and foundation difficult. The policy would also damage the biodiversity of the area, as cited in the original application. The principal reasoning for HM Government inspector to approve the appeal was mainly based upon an apparent failure of FBC to provide adequate provision for gypsy families, and not concerning the specific site. In 2019, the resident gypsy family applied for permission to build a 4 bed detached house on the site specified in HA45. This was refused on the grounds that the proposal would cause material harm to the character and appearance of the area and biodiversity. The inspector concluded that the adverse impacts would significantly and demonstrably outweigh the modest provision to housing supply. I would submit that if a 4 bed detached is deemed to be harmful to the area, then the siting of three gypsy pitches must be far worse and should be rejected. b) The stated need. FBC cite very little need in the next 17 years, but some that needs to be satisfied in the next 5 years. In essence this stated needed is solely for the benefit of the current tenant to house more of their family.

For FBC, policy HA45 is expedient as it resolves their legal requirement with one easy action. In conclusion, I submit that the Legal Compliance has not been followed as no direct consultation or proactive advice to the residents most affected. Secondly I submit that, whilst a legal requirement exists for general provision of houses, Burrridge is not the suitable place in the whole of Fareham Borough to site more gypsy pitches. Thirdly, the stated imminent need of the siting tenant, is false as demonstrated by the application in 2019 for a permanent dwelling to house the extended family.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

1. A longer period of consultation and a requirement on FBC to provide direct proactive advice of the proposals to affected residents. 2. Examine other sites in the Borough and demonstrate that all possible brown field sites have been considered.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

See above, and in addition, review planning history of sitting tenants and their actual requirement for more gypsy pitches to house their extended family, when they have shown a desire for permanent accommodation on the site.

Your suggested revised wording of any policy or text:

Remove HA45 and specific reference to the Burrridge Road site. In addition, there should be a requirement to detail the opportunities and issues to utilise the brown field sites in the Borough, particularly in the light of current factory and shop closures.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

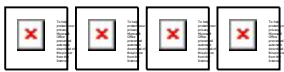
To ensure that all the issues are openly and fairly discussed.

Keely, Lauren

From: Drake, Pete
Sent: 18 December 2020 11:01
To: Keely, Lauren
Subject: Smith Simmons & Partners (on behalf of Elberry Properties) reg 19 response
Attachments: Submitted Elberry Reps form.pdf; shela pro forma 3064.pdf; site plan.pdf; submitted elberry reps.pdf

This has gone to the consultation email already but just for info.

Pete Drake
Principal Planner (Strategy and Regeneration)
Fareham Borough Council
01329824551



From: Paul White [REDACTED]
Sent: 18 December 2020 10:56
To: Consultation <Consultation@fareham.gov.uk>
Cc: Drake, Pete <PDrake@Fareham.Gov.UK>
Subject: Local Plan Reps

Dear sirs,
On behalf of our client, Elberry Properties Ltd we attach our comments, form and other enclosures in respect of the Fareham 2037 Local Plan consultation.
We would be grateful if you could keep us informed of the next stages of the review process.
Kind regards

Paul White
MRTPI
Director of Planning



Visit our NEW website

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☒

Yes

☐

No

A2 Please provide your details below:

Title:

First Name:

Last Name:

Job Title:

(where relevant)

Organisation:

(where relevant)

Elberry Properties Ltd

Address:

c/o Agent

Postcode:

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

Mr

First Name:

Paul

Last Name:

White

Job Title: (where relevant)

Planning Consultant

Organisation:

(where relevant)

Smith Simmons Planning

Address:

15 West Pallant Chichester West Sussex

Postcode:

PO19 1TB

Telephone Number:

Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policies H1, DS2, HP1, HP2

B1c Which part of the Policies Map?

The strategic gap and settlement policy boundaries in the vicinity of Southampton Road Titchfield should both be amended as suggested in the attached comments

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see attached comments with reference to the 'positively prepared' and 'justified' tests of soundness

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Please see attached comments

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Please see attached comments

B4c Your suggested revised wording of any policy or text:

Please see attached comments and proposed changes to policy HP2

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session

☒

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

SITE DETAILS		Discounted Housing Site		Titchfield
ID:	3064	Site Name:	320 Southampton Road, Titchfield	
Current Land Use:	C3 Class/ garden land/ paddock			
Surrounding Land Use:	Residential, open area to South , A27 to the North			
Gross Site Area (ha):	1.06	Housing Yield (estimate):	25	
Employment Yield (estimate):	0	Gypsy and Traveller Pitches (estimate):	0	
SUITABILITY				
Constraints:	Countryside			
Highways/ Pedestrian Access:	Site acceptable in highway terms subject to planned A27 duelling works will have been completed. Access should be created at the eastern end of the frontage.			
Conservation Comments:	No known constraints			
Noise/Air Quality Assessment:	No known issues			
Archaeology:	Site not within identified area of archaeological potential			
Ecology Comment:	The site contains improved grassland with boundary vegetation comprising hedgerows. Adjacent to SINC and Priority Habitat woodland. The boundaries are connected to the wider landscape and will be of some importance to species such as bats, reptiles and possibly dormice.			
Accessible Facility Types:	8 /10	Within 800m of a Convenience Store or Supermarket, within 1200m of a GP Surgery, within 400m of a High Frequency Bus Stops, within 1600m of a Major Employment Areas, within 800m of a Accessible Green or Play Space, within 1200m of a Primary School, within 1600m of a Town/District or Local Centre, within 800m of a Community/Leisure Facility		
Reason for Discounting:	Development of scale promoted would not be in keeping with the settlement pattern and does not accord with the development strategy. Small scale development of fewer than 5 may be in line with the character of the area and could therefore be acceptable.			
Is the site suitable?	No	Is the site available?	Yes	Is the site considered achievable? Yes



V = VISITOR SPACE

ALL BINS AND BIKES STORED WITHIN GARAGES (MIN 3 X 6M)

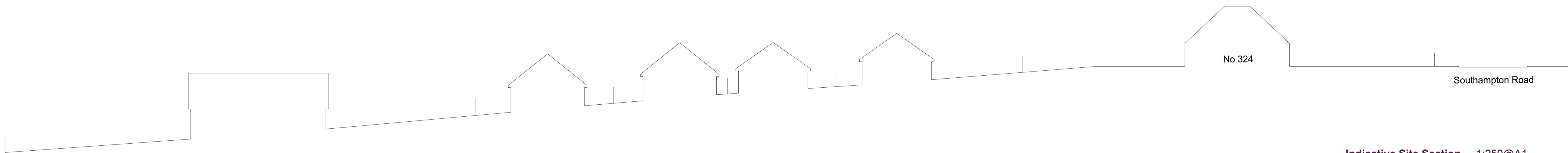
PLOTS 1, 2 & 10 - SINGLE DETACHED GARAGES

PLOTS 3 - 9 - SINGLE INTEGRAL GARAGE

ALL PLOTS HAVE SPACE FOR 2 CARS PLUS GARAGE SPACE



Indicative Site Plan 1:250@A1



Indicative Site Section 1:250@A1

Fareham Local Plan 2037 - Consultation on the Local Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – For Elberry Properties Ltd

These representations to the Fareham Local Plan Regulation 19 Consultation have been prepared on behalf of Elberry Properties Ltd. The company has a land interest in land on the south side of Southampton Road in Tichfield.

These comments deal with the 'tests of soundness' for Local Plan preparation which are set out in paragraph 35 of the NPPF. They require the Fareham Local Plan 2037 to have been:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Our headline comments on the draft Fareham Local Plan cover the following policies and are made in connection with land at the rear of 320 Southampton Road, Tichfield. In our view, the inclusion of the land within the north part of the Meon strategic gap has not been properly justified (test 2) and would conflict with other policies of the plan which deal with housing delivery. The settlement policy boundary for this part of Tichfield has not been properly justified either, and changes to the wording of draft policy HP2 is proposed.

The overall housing requirement proposed in policy H1 of the plan as explained at paragraph 4.2 of the plan says it was prepared using a draft methodology outlined in a government consultation of August 2020. However, in a DCLG press release dated 16 December 2020 it has confirmed that an updated method will be introduced to help councils to enable the delivery of 300,000 homes a year by the mid-2020s, while prioritising brownfield sites and urban areas. Until the new updated method has been clarified, the housing need assumptions on which the Fareham Local Plan 2037 has been prepared therefore cannot be relied on. In this regard, the Local Plan therefore also runs the risk of failing the positively prepared test 1 as well.

We illustrate the shortcomings of the Local Plan in these tests of soundness with reference to **policies DS2 – Strategic Gaps**, **policy H1 – Housing Provision**, **policy HP1 – New Residential Development** and **policy HP2 – Small Scale Development outside defined Urban Areas**.

In making these comments we have reviewed the relevant background documents in the evidence base for the local plan and national policy in the NPPF.

Test 1 – Has the Plan been Positively Prepared?

Paragraph 4.2 of the draft Plan explains how the plan makes provision for Objectively Assessed Housing Need (OAHN) in **policy H1**. It says housing need is determined using the standard methodology set out in national Planning Practice Guidance (PPG). It says using this method, the housing need for Fareham is a minimum of 514 dwellings per annum (dpa). However, in August 2020, the Government released a consultation on a new standard methodology which affords councils the option of using either a percentage of the Borough's

existing housing stock as the calculation's starting point or the most up-to-date household projections, whichever is the higher, before an affordability uplift is applied. The Council says it considers it appropriate for the draft Local Plan to plan for a scale of growth based on the proposed new methodology, and not one based on out-of-date household projections. This reduces the housing need figure to 403 dpa, based on a base date of 2021.

However, as explained above, the DCLG press release dated 16 December 2020 indicates a new updated method will be used while prioritising brownfield sites and urban areas. No information is provided on the updated method but if substantially different to the method consulted on in August 2020 then the Plan runs the risk it will not have made sufficient land allocations and windfall allowances to provide for OAHN.

Currently policy H1 provides for an estimated 1,224 homes on unexpected (windfall) development. Should the overall need figure increase in line with the updated methodology, then we suggest the future contribution of windfall sites as one of the land supply components could be increased to meet any shortfall. To ensure the Plan as drafted meets the positively prepared test, we therefore suggest that an additional windfall contingency is allowed for in **policy H1** taking account of the likely capacity of brownfield sites and other under utilised land within urban areas.

Test 2 – Is the Plan Justified?

i) The development strategy

In line with the Council's 'brownfield first' development strategy for meeting housing need (Local Plan paragraph 3.38) and the anticipated approach of national policy in prioritising brownfield sites and urban areas we propose more emphasis is placed on using brownfield land and underused land in urban areas in the Fareham Local Plan.

This approach will however require a reconsideration of proposed settlement policy boundaries in **policy HP1** and strategic gap boundaries in **policy DS2**.

What is Brownfield Land?

In *Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors* [2017] EWCA Civ 141 (14 March 2017) a Court of Appeal judge ruled on the definition of previously developed land. The case involved development in a private residential garden in a rural area outside a settlement boundary.

The glossary of the NPPF defines previously developed land to include **land in built-up areas such as residential gardens**, parks, recreation grounds and allotments. The judge said that on this definition it could not include all private residential gardens in rural and urban areas but only that within a built-up area. He said:

"As a matter of ordinary English, I cannot see that any other meaning can be given to this sentence. "Land in built-up areas" cannot mean land not in built-up areas".

In our view therefore, taking the council's 'brownfield first' development strategy to meet housing need we suggest the Fareham Plan should take a more permissive attitude towards the redevelopment of sustainably located residential garden land outside currently drawn built up area boundaries and make better use of these sites in **policy HP2**. Alternatively, the settlement policy boundaries in **policy HP1** could be drawn more generously to include more of this type of land within the actual urban area.

Land at Tichfield

In our view and as an example, land to the south of Southampton Road at Tichfield is a good candidate area for residential redevelopment. The area enjoys a sustainable location and, on the Council's, own admission

in the 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA) land in this part of the settlement is suitable in principle for new housing development.

Accompanying these Local Plan representations is a site proforma (Ref 3064) for land to the south of 320 Southampton Road. The site is described as having a sustainable location close to shops and local facilities with no biodiversity, heritage, highway access or other technical constraint to its immediate delivery for development. The site extending to 1.06 ha was proposed at the time for 25 dwellings but was discounted by the Council as a deliverable opportunity because it exceeded the site capacity what was thought to be in character with the wider area.

It concluded that the development of the scale promoted would not be in keeping with the settlement pattern but a smaller scale development of fewer than 5 dwellings may be in line with the character of the area and could therefore be acceptable.

In our view, this part of Tichfield could be included within an extended settlement policy boundary in **policy HP1** using St Margaret's Lane as the boundary. The land falls within the definition of previously developed land because it comprises residential garden land outside the current settlement boundary. It is plainly already within the urban envelope of this part of Tichfield and enjoys a sustainable location. A development of more than 5 dwellings (and we would suggest a figure of around 10 dwellings) could come forward without harming the wider character because the site is already contained by woodland planting and a modest in-depth development would be concealed in principal views from the main road. It would comply with the 'brownfield first' strategy and provide a useful land contingency should the housing requirements for Fareham need to be increased in **policy H1**.

Alternatively, the site could come forward in accordance with draft **policy HP2** which already allows for small scale housing development outside urban areas. The policy is welcomed in principle as it does reflect the national policy imperative in the NPPF of making better use of smaller sites of around 1ha (NPPF paragraph 68a). In emphasising the use of land within or adjacent to existing areas of housing or well related to a settlement boundary also makes sense from a sustainability point of view.

However as currently drafted **policy HP2** sets a site size limit of up to 4 dwellings and this would result in an inefficient use of land for sites of around 1ha in size. Test 4 is also too prescriptive and the principles of urban form it seeks to manage is already covered by **Policy D1** on High Quality Design and Place Making.

We therefore propose **policy HP2** is amended to state:

'New small-scale housing development outside the Urban Area boundary, as shown on the Policies map, will be permitted where:

- 1. The site is within or adjacent to existing areas of housing; or**
- 2. The site is well related to the settlement boundary; and**
- 3. The site is within reasonable proximity to a high frequency bus route or a train station as well as safe walking and cycling routes that connect to a local, district or town centre; and**
- 4. It comprises development:**
 - a. of not more than 10 units; and**
 - b. does not extend the settlement frontage.**

ii) **Strategic Gap policy**

The Technical Review of Areas of Special Landscape Quality and Strategic Gaps forms part of the evidence base for the local plan. It includes land at Tichfield south of Southampton Road within the north part of the Meon Strategic Gap. In our view however, the strategic gap boundaries have been drawn too tightly around existing urban areas and the operation of **policy DS2** will conflict with the objectives of **policy HP2** and prevent land coming forward for residential development where it is adjacent to existing areas of housing or is well located to a settlement boundary even at the scale suggested in the SHELAA pro forma Ref 3064.

We therefore propose that the strategic gap boundary in the vicinity of land south of Southampton Road, Tichfield is redrawn to follow St Margaret's Lane. This would release land on the east side of the road within the urban envelope of Tichfield for development in accordance with **policy HP2**. Alternatively, as suggested above, this part of Tichfield being within the urban envelope could be included within an extended settlement policy boundary in **policy HP1** using St Margaret's Lane as the boundary.

In our view these simple boundary changes would ensure additional land could come forward as a windfall contingency should the updated methodology for calculating housing need require it. This would benefit the Plan in terms of the '**positively prepared**' test.

The changes would also improve the Plans performance in terms of the '**justified**' test and allow the redevelopment of sustainably located residential garden land outside currently drawn built up area boundaries in accordance with the 'brownfield first' development strategy of the Plan.

If the proposed changes are accepted, an illustrative plan showing how it would benefit land on the south side of Southampton Road and secure a development of 10 dwellings is attached for information.

Name: Paul White for Elberry Properties Ltd

Date: 17 December 2020

Respondent details:

Title:	Mrs
First Name:	Laura
Last Name:	Lax
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	Environment Agency
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: FTC4 - Fareham Station West

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Part of this site lies within current day flood zone 2, there is also a culverted watercourse that flows beneath the site. We are supportive of bullet points (i) and (j) within this policy that recognise these key issues and require full consideration of them within any proposal that comes forward. This is essential to allow the safe redevelopment of the site by ensuring that flood risk is not increased and reduced wherever possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: HA7 - Warsash Maritime Academy

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Within this policy it is correctly recognised that part of the site lies within current day flood zones 2 and 3 and that this risk is likely to increase with climate change. We are therefore supportive of criteria (m) within the policy wording stating that development should avoid flood risk areas. This will ensure that the site is developed safely without increasing flood risk and reducing it where possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Policy: HA19 - 399-403 Hunts Pond Road

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

It is correctly recognised within the plan that part of this site lies within current day flood zones 2 and 3. We are pleased to see that a development criteria (f) has been included to specify that no development or site access should be within these areas. This will ensure the development and its occupants are not at increased risk of flooding.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Policy: CC1 - Climate Change

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We are very supportive of this policy on climate change, which we are happy to see is cross cutting and has specific reference to flood risk, water efficiency and green/blue infrastructure. This will help ensure that development in Fareham Borough is sustainable and resilient to climate change.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

5) Policy: CC2 - Managing Flood Risk and Sustainable Drainage Systems

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We support the inclusion of this policy and we see it as essential given the flood risk in the Borough from a variety of sources. We feel that it is a robust policy that provides a clear approach as to how potential flood risk from all sources of flooding should be managed through the planning application process. It will ensure that risk is not increased for either the new or existing population of the Borough.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

6) Policy: D4 - Water Quality and Resources

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We are very supportive of this policy. The inclusion of the higher water efficiency standard acknowledges the water resource sensitivity of South Hampshire and should help ensure that sustainable growth can be achieved throughout the Local Plan period. Reducing the amount of water entering the treatment works and receiving environments is also a key way of helping mitigate issues around the capacity of waste water treatment works and receiving environments, especially in relation to the discharge of Nitrogen into the surrounding harbours. We are also pleased to see the mention of water quality, ensuring that proposals are not detrimental to the water environment whilst also seeking opportunities to enhance it, helping achievement of Water Framework Directive objectives.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

7) Policy: HA44 - Assheton Court

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

This site has correctly been identified within the plan as lying partially within the current day flood zones 2 and 3, this risk is likely to increase with climate change. We understand that this policy proposes the redevelopment of an existing site but that it would result in additional units being proposed. We do not feel that enough evidence has currently been produced to demonstrate that this site could be delivered in a safe manner. We do not have details with regard to the particular flood risk characteristics that would affect the site but it is likely that there could be a significant depth of flooding in future years as a result of sea level rise. It must therefore be given careful consideration as to whether it would ever be possible to eliminate the risk of tidal flooding. If the proposal was for redevelopment of the site without the addition of additional units then there would be an opportunity to redesign the site to reduce the risk of flooding below what it would have been were there to be no changes made, this is obviously not the case if additional people are to be put at risk. Given the use of the site and the likely level of residual flood risk, consideration of flood response planning i.e. prior evacuation/safe refuge will be important. Our view is if this site is to be allocated for redevelopment then there should be no increase in occupancy, which would increase the number of people residing within an area of potentially significant flood risk. We would also point out that in the strategic flood risk assessment document that accompanies the plan, the column regarding whether the sequential test has been passed or not is blank. This obviously needs to be completed and we feel that the council should give consideration as to whether this is the correct type of development in this location. We acknowledge that sheltered accommodation already exists on this site but by redeveloping the site this extends the lifetime of the building over a time when the risk of flooding is also likely to increase.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Further consideration needs to be given to whether this is an acceptable location for the allocation. Currently there is no evidence that the sequential test has been passed for this site and that there are no other locations suitable in lower areas of flood risk. If the sequential test can be passed then further assessment of the future flood risk to the site should be undertaken to demonstrate that the site is deliverable in flood risk terms both now and in the future. If this can be demonstrated, we do not think that additional units should be included as part of this proposal as this would put more vulnerable people at risk and therefore the overall risk of the proposal would be increased.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It should be demonstrated that flood risk can be adequately managed for the site and there is no increase in risk to the site and its occupants. It would therefore be compliant with paragraphs 155 - 161 of the NPPF and policy CC2 of this plan.

Your suggested revised wording of any policy or text:

It should be demonstrated that flood risk can be adequately managed for the site and there is no increase in risk to the site and its occupants.

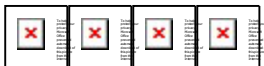
If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 18 December 2020 14:55
To: Planning Policy
Subject: Fareham Labour Party Consultation response

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Andy Mooney [REDACTED]
Sent: 18 December 2020 12:58
To: Consultation <Consultation@fareham.gov.uk>
Subject: Fareham Local Plan Consultation

On behalf of Fareham Constituency Labour Party, I wish to submit the following in response to the consultation

Fareham Labour Party response to local plan consultation

Fareham Labour would wish to submit the following in response to the consultation on the Publication Local Plan.

We welcome the fact that the revised local plan reduces the number of houses to be built on greenfield sites as we believe that the bulk of the housing needs for Fareham should be accommodated through a combination of the Welborne development and through the use of brownfield sites elsewhere in the borough. We welcome the removal of sites in Portchester and Wallington and preservation of the strategic gap. We remain concerned at the level of development proposed for the Western Wards. We are disappointed that greenfield sites remain under threat. We support prioritising brownfield sites, including building higher density housing in existing town centres.

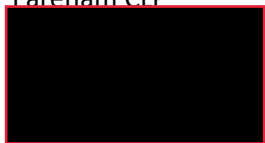
We do not agree that the provision for affordable homes in the plan is adequate. We question whether this plan is accounting for growth in demand over this period or even seeking to maintain a bare minimum in providing good living conditions for local families. We see town centres as one area that can provide much needed affordable housing.

Fareham Borough Council should not ignore the fact that many especially young people need affordable housing. The council should identify further brownfield sites for development.

The Fareham local plan should include a new railway station on the Western edge of the Welborne development, this is relevant for the whole of Fareham, not just for Welborne. Residents in existing housing in North Fareham would be able to use this new station at Welborne including by walking and cycling. The provision of such a railway station is essential to take sufficient traffic off the roads in Fareham to avoid severe traffic congestion. A bus service will not achieve the necessary modal shift to public transport. If people can walk to and from the railway station in Welborne and only have to buy a rail ticket they will take the train. If people have to spend time and money travelling by bus to Fareham Railway Station to take the train they will drive and we shall have severe road traffic congestion in Fareham.

Regards

Andrew Mooney
Secretary
Fareham CLP



Respondent details:

Title:	Mr
First Name:	Robert
Last Name:	Marshall
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	Fareham Society
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HP1 - New Residential Development

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This Policy is unsound in so far that it contains no restriction on the size of replacement dwellings or house extensions. Overlarge replacement dwellings and extended dwellings can detract from the undeveloped rural character and appearance of the countryside. Thus the Policy as worded fails to have regard to NPPF para. 170 which seeks to ensure that new development contributes to and enhances the natural and local environment. This is of particular importance given that the extensively built-up nature of the Borough means that the rural areas are highly valued as a counterpoint. Moreover, the quality of the rural area is high, with much of it designated in this plan as an Area of Special Landscape Quality (ASLQ). Thus it is all the more important that the intrinsic character and beauty of the countryside is recognised and valued landscapes protected.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The proposed Policy merely seeks that replacement dwellings be of an appropriate character to their location. This is insufficient in itself to adequately control such development, and nor does it take account of extensions. The modification that is necessary is to impose, in addition, a floorspace limitation upon replacement dwellings and extended dwellings.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b The suggestion is, in addition, to require replacement dwellings to have a floorspace increase no larger than 30% over and above the existing dwelling. To ensure that the Policy only applies where the added floorspace of an extension would have an adverse visual impact floorspace provided within the existing building envelope would not be taken into account in determining the percentage increase.

Your suggested revised wording of any policy or text:

B4c The Policy should be reworded to add b) it is for a replacement dwelling which is of an appropriate character to the location and in any event no greater than 30% larger than the existing dwelling c) it is for an extension that would result in an increase in floorspace which is of an appropriate character to the location and in any event no more than a 30% increase in floorspace over and above the existing dwelling. Explanatory text should be added to say that “for the interpretation of this Policy floorspace figures should be measured externally, for extensions any addition within the existing building envelope shall not be taken into account in determining the percentage increase, and in determining whether a replacement dwelling or extended dwelling is of an appropriate character to the location regard shall be had of the need to avoid harm though the cumulative effect of such development and the impact of past development will be taken into account.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's view are discussed and an opportunity is given to respond to the views of others.

2) Policy: HP2 - New Small-scale Development Outside Defined Urban Areas

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound because the impact of development of this scale, and potentially in depth, beyond the settlement boundary would harm the rural character and appearance of the countryside. It has the potential to substantially consolidate the built form in these areas (see figure 5.1 in the emerging plan), the cumulative impact of which would blur the important distinction between the countryside and the urban area. It fails to have regard to NPPF para. 170 which seeks to ensure that new development contributes to and enhances the natural and local environment. This is of particular importance given that the extensively built-up nature of the Borough means that the rural areas are highly valued as a counterpoint. Moreover, the quality of the rural area is high, with much of it designated in this plan as an Area of Special Landscape Quality (ASLQ). Thus it is all the more important that the intrinsic character and beauty of the countryside is recognised and valued landscapes protected.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. To make the plan sound this Policy should be deleted from the Plan. To ensure that some residential development could take place beyond the settlement boundary a Policy similar to Policy DSP6 of the adopted plan could be used. This allows limited frontage infill of up to 2 dwellings. This would have less impact on the character and appearance of the countryside and thus accord with the NPPF.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would ensure that replacement and extended dwellings would meet the NPPF objective in para 170.

Your suggested revised wording of any policy or text:

B4c. The suggested rewording: “New residential development will be permitted outside the defined urban settlement boundaries (as identified on the Policies Map) where it comprises one or two new dwellings which infill an existing and continuous built-up residential frontage, where: a) The new dwellings and plots are consistent in terms of size and character to the adjoining properties and would not harm the character of the area; b) It does not result in the extension of an existing frontage or the consolidation of an isolated group of dwellings; and c) It does not involve the siting of dwellings at the rear of the new or existing dwellings.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

3) Policy: HP3 - Change of Use to Garden Land

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound in so far that it fails to have regard to a key factor, ancillary buildings on garden land, that can lead to such changes of use detracting from the character and appearance of areas beyond the development boundary. Thus, the Policy as worded fails to have regard to NPPF para. 170 which seeks to ensure that ensure that new development contributes to and enhances the natural and local environment. This is of particular importance given that the extensively built-up nature of the Borough means that the rural areas are highly valued as a counterpoint. Moreover, the quality of the rural area is high, with much of it designated in this plan as an Area of Special Landscape Quality (ASLQ). Thus it is all the more important that the intrinsic character and beauty of the countryside is recognised and valued landscapes protected.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. To make the Policy sound reference must be made to the impact of ancillary buildings.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would ensure that garden extensions would meet the the NPPF objectives in para 170.

Your suggested revised wording of any policy or text:

B4c. Amend HP3b to say "It, along with ancillary buildings allowed as permitted development will not detract from the existing landscape"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

4) Policy: HP6 - Exception Sites

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 The Policy on rural exception sites is unsound as its wording and that of the explanatory text clearly indicates that it refers to rural areas. This District although it contains countryside is not categorised as a rural authority and has no rural communities. It thus does not have all the particular housing and social issues that need to be addressed in such areas.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The Policy on rural exception sites should be deleted from the plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b It would remove an irrelevant Policy on rural exception sites.

Your suggested revised wording of any policy or text:

B4c Not applicable

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the vies of others.

5) Policy: HP8 - Older Persons' and Specialist Housing Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound in so far that it opens up the possibility of such accommodation being provided in the countryside beyond the settlement boundary. Such development is often large in scale and such would detract from the character and appearance of the countryside. Re-development opportunities do arise within the urban area and older person/specialist housing provision should be treated no differently than normal flatted development. Thus, the Policy as worded fails to have regard to NPPF para. 170 which seeks to ensure that ensure that new development contributes to and enhances the natural and local environment. This is of particular importance given that the extensively built-up nature of the Borough means that the rural areas are highly valued as a counterpoint. Moreover, the quality of the rural area is high, with much of it designated in this plan as an Area of Special Landscape Quality (ASLQ). Thus, it is all the more important that the intrinsic character and beauty of the countryside is recognised and valued landscapes protected.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a To make the Policy sound the possibility of older person/specialist accommodation outside the urban boundary should be deleted.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b This would ensure that there is no contravention of the requirements in para 170 of the NPPF..

Your suggested revised wording of any policy or text:

B4c. Revise the last sentence in the Policy simply to say "New older persons or specialist housing shall be provided within the Urban Area boundary."

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed an an opportunity is given to respond to the view of others.

6) Policy: HP10 - Ancillary Accommodation

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound, in part, on 3 counts. First, much of the explanatory text is so essential to the satisfactory operation of the Policy that it should be within the Policy itself. Second, the Policy should specifically require ancillary accommodation to be close to the principal dwelling. This is to prevent later pressure, which may be difficult to resist, for such accommodation to be turned into separate dwellings contrary to the aim of the NPPF in providing well designed places. And in rural areas the potential for ancillary buildings to become separate dwellings would be contrary to NPPF para. 170 which seeks to ensure that new development contributes to and enhances the natural and local environment. It would also thereby, in rural areas, give rise to car dependent housing contrary to the NPPF environmental objective of seeking to use natural resources prudently and moving to a low carbon economy. Third, explanatory paragraph 5.82 needs to be more clearly worded to make it clear that it is saying that an unrelated unit of accommodation is in effect a new dwelling and will not be regarded as Ancillary Accommodation under this Policy.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. Move much of the explanatory test into the main Policy and amend the Policy to require to require ancillary accommodation to be close to the principal dwelling.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would prevent the harm outlined in B3 above.

Your suggested revised wording of any policy or text:

B4c. Amend HP10a to "a) It is within the curtilage of the principal dwelling and close it;" Add to HP10: f) The ancillary accommodation shall remain within the curtilage of, and in same ownership as, the principal dwelling. A planning condition will be imposed to prevent the use of the ancillary accommodation as a separate dwelling. g) the principal dwelling shall remain larger than the ancillary accommodation. Explanatory paragraph 5.83 altered to "an unrelated unit of accommodation is in effect a new dwelling and will not be regarded as ancillary accommodation under this Policy."

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

7) Policy: HA45 - Rear of 77 Burrridge Road

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound in so far that the necessary mitigation required given the site's location on and partly adjoining a SINC would require the developer or occupier to have ownership of, or some rights over, the SINC. There is no evidence from the past history of the site that this is so. The site's allocation would thus conflict with NPPF requirements on conserving and enhancing the natural environment by protecting and enhancing sites of biodiversity in a manner commensurate with their identified quality in the development plan.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. To make the plan sound the allocation should be removed

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. By preventing conflict with NPPF requirements on conserving and enhancing the natural environment.

Your suggested revised wording of any policy or text:

BC4c Not applicable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

8) Policy: R1 - Retail Hierarchy and Protecting the Vitality and Viability of Centres

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This is unsound in so far that the second paragraph of the Policy refers to main town centres uses being permitted within defined town centres. The whole of the designated Fareham Town Centre is so widely drawn that it includes important residential areas and large open spaces unsuitable for town centre uses. Such uses outside the designated Primary Shopping Area would conflict with the NPPF requirement of achieving well-designed places and better places in which to live.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The policy should be reworded so that it applies to the more limited designated Primary Shopping Area, where such uses would be acceptable.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b By preventing main town centre uses in areas where they would no longer acceptable.

Your suggested revised wording of any policy or text:

B4c The second paragraph should be amended to say “Where planning permission is required, main town centre uses, as defined in the National Planning Policy Framework (NPPF), will be permitted within the defined Primary Shopping Area of Fareham Town Centre, district and local centres.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

9) Policy: R4 - Community and Leisure Facilities

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This Policy is unsound in so far that it does not deal with the limitations that should apply to any of these uses, such as sports venues and open space, that may be applied for outside settlement boundaries. Such uses, if large scale and containing substantial buildings, can be especially intrusive in the countryside. Thus they should only be allowed if they are small scale uses and the associated buildings are also small scale. Without this limitation such development would detract from the character and appearance of the countryside. Thus, the Policy fails to have regard NPPF para. 170 which seeks to ensure that new development contributes to and enhances the natural and local environment. This is of particular importance given that the extensively built-up nature of the Borough means that the rural areas are highly valued as a counterpoint. Moreover, the quality of the rural area is high, with much of it designated in this plan as an Area of Special Landscape Quality (ASLQ). Thus, it is all the more important that the intrinsic character and beauty of the countryside is recognised and valued landscapes protected.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The Policy should specify that such uses are generally acceptable only within the development boundaries but that any that may be considered acceptable beyond those boundaries, such as sports venues and open space, must be small scale uses with small scale buildings.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b By preventing the harm identified above.

Your suggested revised wording of any policy or text:

B4c A criteria e) should be added “Such facilities should generally be permitted only within the development boundary, and any uses outside those boundaries such as sports venues and open space shall, as well as complying with the other criteria above, need to be small scale use with small scale buildings”.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity given to respond to the views of others.

10) Policy: E1- Employment Land Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This Policy is sound in all but one respect on the two Daedalus allocations. This is a strategic allocation originally brought forward in adopted Core Strategy CS12. This said that development will be permitted on the site where, amongst other things, it delivers, or facilitates the delivery of high quality development including a) employment development that retains and strengthens the marine and aviation employment clusters, particularly those that require direct access to an operational airfield. This accords with the Council's vision for the site and the Lambeth Smith Hampton background paper to the emerging Local Plan refers to this and says that the advanced manufacturing such as that pursued at Daedalus is a sector regarded as one of the most significant opportunities for the UK to rebalance and reinvigorate the economy. The emerging Policy does not promote the idea of such advanced manufacturing for the site, and without doing so there is a danger that this valuable site could be lost to commercial uses less valuable to the economy. This would run counter to the requirement in the NPPF of building a strong and competitive economy and that each area should build on its strengths especially where Britain can be a leader in innovation.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The Policy should be revised to include the wording similar to that of Core Policy CS12 referred to above.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b This would ensure that the Policy met the objective of the NPPF on the building of a strong and competitive economy.

Your suggested revised wording of any policy or text:

B4c See B4a above.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

11) Policy: NE8 - Air Quality

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This Policy is unsound in so far that the main text of the Policy does not make it clear that explanatory text paragraphs 9.108 – 9.110 set out what may be required to meet the Policy requirement. This may lead to developers, especially small-scale developer, to be unaware of the requirements and prevent them being taken on board and discussed with the LPA. This runs counter to the intentions of Government policy (PPG on Air Quality (2019)) which says that it is important that applicants engage early on with the local planning authority and environmental health departments to establish the need for and scope of any assessment to support an application.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The Policy should guide applicants for small scale schemes to the relevant explanatory text.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b It would ensure that developers of minor development take on board relevant requirements and discuss them with the LPA.

Your suggested revised wording of any policy or text:

B4c Amend the second sentence of the Policy to read “Minor development should reduce its impacts on air quality and have regard to explanatory text paragraphs 9.108 – 9.110.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

12) Policy: NE9 - Green Infrastructure

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This Policy is unsound in so far as there is no indication that it would be effective. To be effective applicant's and Council case officers would need an easy and ready way of knowing where future and proposed Green Infrastructure existed. For this a single compendium of such space is required, indicating where they exist, to obviate the necessity for looking at the myriad of resources referred to.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a A compendium, capable of being updated, should be provided of Green Infrastructure in the District. The Policy should then be amended to make reference to this.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b By ensuring that applicants and Council case officers are aware of the location of Green infrastructure so as to ensure it is safeguarded.

Your suggested revised wording of any policy or text:

B4c By adding to the Policy “all Green infrastructure covered by this Policy may be found on the Council's compendium of such spaces.”

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

13) Policy: NE10 - Provision and Protection of Open Space

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This Policy is unsound in so far as it does not in the Policy text set out, or refer to, the minimum open space and play space requirements for new development set out in explanatory text paragraph 9.134 table 9.1. Thus the Policy might encourage applicants to argue for lesser space standards than what are clearly the minimum acceptable. Given this the Policy would not ensure satisfactory space standards and the NPPF intentions that planning policies should enable and support healthy lifestyles through the provision of safe and accessible greenspace (NPPF para91) would not be met.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The text of the Plan should set the space standards set out in Table 9.1 as the minimum requirement to be met.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b By ensuring NPPF objectives on promoting healthy communities would be met.

Your suggested revised wording of any policy or text:

B4c By amending the penultimate sentence of the last paragraph of this Policy to read "Residential development will be required to provide open and play space that will satisfactorily meet the needs of new residents. Table 9.1 below is a minimum space standard and developments will be required to meet higher levels of open and play space provision where that is necessary to make the development acceptable." The final sentence to be retained.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

14) Policy: FTC1 - Palmerston Car Park

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This proposed allocation is unsound on 2 grounds. First, there would be an unacceptable loss of town centre car parking spaces well located to meet the needs of the town centre shopping area and the shops in West Street. Second, the proposed indicative yield of 20 dwellings would lead to housing forward of the building line to detriment of the character and appearance of the area generally and the adjoining Osborn Conservation area to the north of Osborn Road. The Osborn Road Conservation Area Character Assessment Feb 2006 describes the area as comprising a series of Victorian villas set in large gardens. It describes the development pattern as being unique in Fareham and says that its setting includes the land opposite the Conservation Area to the South of Osborn Road, which thus includes the allocation site. Where modern development to the south of Osborn Road has been undertaken it has been well set back from the road and screened by mature planting. The provision of residential development forward of the building line would seriously detract from the character and appearance of the Conservation Area. On the first ground the proposed allocation would be harmful to the vitality of the town centre and West Street and as such conflict with the NPPF. Whilst the NPPF supports some housing in Town Centres for the role it plays in their vitality, this is with the caveat that it should be on appropriate sites, and this is not such a site (NPPF para 85.f) Harm on the second ground conflicts with NPPF policies on protecting Heritage Assets.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The allocation should be withdrawn from the Plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would prevent the conflict with the NPPF referred to above.

Your suggested revised wording of any policy or text:

B4c Not applicable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

15) Policy: FTC2 - Market Quay

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This allocation is unsound as the site is considered incapable of accommodating the extent of mixed-use development referred to. There are also reservations over the maximum suggested height of development given the prominence of the site off a major traffic roundabout and the extent to which the site rises in height from south to north and is seen from short, medium and long-distance viewpoints. No sketch site briefs have been provided to indicate otherwise. Given the importance of this town centre site, and the multiplicity of uses suggested a detailed development brief is essential to guide future development of the site to ensure a site that functions well and enhances this part of the town centre. However, the Policy does not set out this requirement. Given the above the allocation as proposed would fail to ensure that future development of the site would meet the NPPF requirements for achieving well designed places set out in paragraphs 124-127.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. In the absence of evidence to support the building heights proposed reference to specific building heights should be removed. And it should be stated that the Council will support a mixed-use development incorporating some of the uses set out. The allocation should specify that a comprehensive development of the site will only take place in accordance with a detailed development brief.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would ensure that development of this important town centre site is undertaken in a way that complies with the NPPF objective of achieving well designed places.

Your suggested revised wording of any policy or text:

B4c. The supporting text to the allocation should say that “The Council will support a mixed-use development incorporating some of the uses set out in the bullet points and subject to development being in accordance with a development brief (to be subject to public consultation) that sets out how the site will function and enhance this part of the town centre and have regard to the prominence and visibility of the site.” Reference in the bullet points to commercial/leisure floorspace and housing numbers should be removed, along with reference to building heights.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

16) Policy: FTC3 - Fareham Station East

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This is a sustainable location for housing given its proximity to Fareham railway station, bus routes and shops etc. and an element of retail and café uses would also fit in well. However, the site has the following constraints to development: Much of the site comprises the railway station car park and this is essential in encouraging rail travel. The Policy refers to retention of sufficient car parking to serve the railway station without saying how much this is. The fire station may need to be retained on site if it can't be relocated; Sufficient space is required to ensure a good public realm at the station approach. The adjacent gravel yard would potentially be a bad neighbour in terms of noise and dust – and this has not been taken into account. No evidence has been put forward to show that the maximum 5 storey height would not be too high. It has not been shown how, in light of the above, the proposed development at the scale outlined could be satisfactorily achieved. Given the above the allocation as proposed would fail to ensure that future development of the site would to meet the NPPF requirements for achieving well designed places set out in paragraphs 124-127.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. This is not an allocation that can be agreed to at this stage as there is no evidence, by way of a development brief, that the site could be developed as proposed in a satisfactory way. The allocation should be deleted from the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. By preventing development of the site until a development brief has been prepared to show that development could be undertaken satisfactorily given all the constraints referred to.

Your suggested revised wording of any policy or text:

B4c. Not applicable .

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others

17) Policy: HA26 - Beacon Bottom East

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This site is sound in relation to its proximity to public transport and shops. However, the proposed site allocation is unsound given the indicative yield on 9 dwellings. Undetermined application F/19/1061/FP for this number of houses on the site indicated houses would so close the highway as to be detrimental to the character and appearance of the area and harmful to the setting of the adjoining locally listed cottage. A tall western boundary hedge would have unacceptably shaded the gardens of many houses on the site. Given how small the site is revised layouts are unlikely to overcome this harm. There would thus be conflict with NPPF requirements that: planning should ensure that developments add to the overall quality of the area and be sympathetic to local character (NPPF para 127); and on the prevention of harm to Heritage Assets (paras 193/4)

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The allocation should either be withdrawn from the Plan or alternatively the indicative yield deleted or substantially reduced in number.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b Prevent the harm outlined in B3 above.

Your suggested revised wording of any policy or text:

B4c. See above - potentially the removal of the indicative yield or its revision downwards.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

18) Policy: HA36 - Locks Heath District Centre

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This allocation is unsound as it would result in the loss of car parking for the Locks Heath District Centre. A detailed assessment of this Centre was carried out in the Fareham Retail and Commercial Leisure Study: Update Report Litchfields 2020, a background paper to the Local Plan. This report refers to a large area of free surface parking adjacent to the Centre and says that this is one of its strengths. This is unsurprising because this centre, built in 1983, lies in an area known as the Fareham Western Wards developed in the 1970/80's and which, typical of that period, is highly car dependant. The loss of a substantial portion of the car park would thus be detrimental to the Centre's health and vitality. This would be contrary to Strategic Policy R1 of the emerging Local Plan which says that any development that would significantly harm the vitality and viability of a defined centre will not be permitted. It would also be contrary to the NPPF which seeks to ensure the vitality of town centres and which, although recognising the role that housing can play in such areas, says that this must be on appropriate sites.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The allocation should be removed from the Local Plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would prevent the harm outlined above to the health and vitality of the centre

Your suggested revised wording of any policy or text:

B4c Not applicable

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

19) Policy: HA36 - Locks Heath District Centre

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This allocation is unsound as it would result in the loss of car parking for the Locks Heath District Centre. A detailed assessment of this Centre was carried out in the Fareham Retail and Commercial Leisure Study: Update Report Litchfields 2020, a background paper to the Local Plan. This report refers to a large area of free surface parking adjacent to the Centre and says that this is one of its strengths. This is unsurprising because this centre, built in 1983, lies in an area known as the Fareham Western Wards developed in the 1970/80's and which, typical of that period, is highly car dependant. The loss of a substantial portion of the car park would thus be detrimental to the Centre's health and vitality. This would be contrary to Strategic Policy R1 of the emerging Local Plan which says that any development that would significantly harm the vitality and viability of a defined centre will not be permitted. It would also be contrary to the NPPF which seeks to ensure the vitality of town centres and which, although recognising the role that housing can play in such areas, says that this must be on appropriate sites.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The allocation should be removed from the Local Plan.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would prevent the harm outlined above to the health and vitality of the centre.

Your suggested revised wording of any policy or text:

B4c Not applicable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

20) Policy: HA37 - Former Locks Heath Filing Station

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This allocation is unsound as it would result in the loss of car parking for the Locks Heath District Centre (although the allocation simply refers to the site as a former petrol filling station it also encompasses a significant parking area for the Centre). A detailed assessment of this Centre was carried out in the Fareham Retail and Commercial Leisure Study: Update Report Litchfields 2020, a background paper to the Local Plan. This report refers to a large area of free surface parking adjacent to the Centre and says that this is one of its strengths. This is unsurprising because this centre, built in 1983, lies in an area known as the Fareham Western Wards developed in the 1970/80's and which, typical of that period, is highly car dependant. The loss of a substantial portion of the car park would thus be detrimental to the Centre's health and vitality. This would be contrary to Strategic Policy R1 of the emerging Local Plan which says that any development that would significantly harm the vitality and viability of a defined centre will not be permitted. It would also be contrary to the NPPF which seeks to ensure the vitality of town centres and which, although recognising the role that housing can play in such areas says that this must be on appropriate sites.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The allocation should be removed from the Local Plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b. It would prevent the harm outlined above to the health and vitality of the centre.

Your suggested revised wording of any policy or text:

B4c Not applicable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

21) Policy: HA38 - 68 Titchfield Park Road

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3. This is a sound site for housing in locational terms. However, the site appears too small to accommodate the indicative yield of 9 dwellings without unacceptable tree loss and harm to the living conditions of those directly to the north. There would thus be conflict with NPPF requirements that: planning should ensure that developments add to the overall quality of the area and be sympathetic to local character (NPPF para 127); and on the social objective of ensuring a well- designed environment.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a The allocation should either be withdrawn from the Plan or alternatively the indicative yield deleted or substantially reduced in number.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b Prevent the harm outlined in B3 above.

Your suggested revised wording of any policy or text:

B4c. See above - potentially the removal of the indicative yield or its revision downwards.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

22) Policy: HA42 - Land South of Cams Alders

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

B3 This allocation is unsound as the Proposals Map seems to show most if it in a SINC and close to Fort Fareham, an ancient monument. Development of the site would be harmful to the ecological interest of the SINC and potentially harmful to the setting of the ancient monument. It would also detract from the pleasant wooded aspect of the southern boundary of Cams Alders which, with land on nearby Fort Fareham, provides an attractive area for casual recreation. As such the allocation would conflict with the objectives of the NPPF on ecology, the protection of Heritage Assets and on securing attractive spaces.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4a. The allocation should be removed from the Plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4b By preventing the harm found above.

Your suggested revised wording of any policy or text:

B4c Not applicable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To ensure that the Fareham Society's views are discussed and an opportunity is given to respond to the views of others.

Respondent details:

Title:	Mr
First Name:	Gianmarco
Last Name:	Fiorentino
Job Title: (where relevant)	Financial Advisor
Organisation: (where relevant)	[No Reply]
Address:	Brook Avenue, Warsash
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Allocation should be removed from the development plan. HA32 is an allocation in the Hamble Valley Area of Special Landscape Quality, paragraph 3.9 of the Development plan says 'there remain no development allocations in these areas.' Inclusion of HA32 contradicts paragraph 3.9 Planning status of HA32 as noted in the Development plan reads 'Planning Status as at 1st July 2020: Outline planning permission granted (P/18/0592/OA)'. This is not true. The planning committee meeting did not take place until 19th August 2020. This could be indicative of FBC pre-determining the decision that the councillors might make and therefore be unlawful. HA32 is the subject of Judicial Review because it did not comply with the policies in the extant plan, the Nitrate calculation included as mitigation relies on untenable assumptions, the application does not include land needed to reach the public highway. The site is considered by residents, and a leading planning QC to be undeliverable due to a number of reasons & therefore should not be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 allocation

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the plan

Your suggested revised wording of any policy or text:

Remove HA32 allocation

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Geoffrey
Last Name:	Foote
Job Title: (where relevant)	N/A
Organisation: (where relevant)	N/A
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA4 - Downend Road East

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The fact that applications by Miller Homes to build 350 dwellings in this area has twice been rejected by Hampshire CC & also once turned down by HM government inspectorate shows that this area is not suitable for residential development due to insurmountable access issues. I therefore request that this land be removed from the local plan as is already the case with the land to the west of Downend Road

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Removal of the land to the east of Downend Road should be removed from the local plan as is already the case with the land to the west of Downend Road.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would prevent development of this area from unsuitable residential development

Your suggested revised wording of any policy or text:

As above

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 16 December 2020 16:39
To: Planning Policy
Subject: FW: Local Plan Repsonse
Attachments: 201215 FBC Local Plan Reps.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Katherine Richards <[REDACTED]>
Sent: 15 December 2020 15:45
To: Consultation <Consultation@fareham.gov.uk>
Subject: Local Plan Repsonse

Good afternoon,

Thank you for the opportunity to comment on the latest publication version of the Local Plan 2037. Please find attached comments relating to a number of draft policies. If you need any clarification please do not hesitate to contact me.

Kind regards,

Katherine Richards
BSc MSc MRTPI
Planner



Unit 1, Station Industrial Park
Duncan Road
Park Gate
Hampshire
SO31 1BX
Tel: 0330 333 7365
foremanhomes.co.uk



Foreman Homes Group Ltd, Registered in England & Wales No. 04420143 Registered Office: Unit 1, Station Industrial Park, Duncan Road, Park Gate, Southampton, SO31 1BX. Tel: 0330 333 7365 This communication is from Foreman Homes Group Ltd or one of its associated or subsidiary companies and is intended for the addressee only. The information contained within is confidential and may be privileged. If you are not the person or organisation to

whom it is addressed you must not copy, print, distribute, disclose or rely on its contents. If you have received this transmission in error please notify the sender and delete it immediately. Reasonable care has been taken to ensure that this communication (and any attachments or hyperlinks contained within) is free from computer viruses, no responsibility is accepted by Foreman Homes Group Ltd or it's associated or subsidiary companies and it is recommended that you carry out your own virus checks...



Sent by email to: consultation@fareham.gov.uk

15th December 2020

Dear Sir/Madam,

Response to the consultation on the Fareham Borough Local Plan 2037

Foreman Homes would like to thank Fareham Borough Council for giving us the opportunity to comment on the emerging Local Plan. We would welcome, in due course, participating in hearings of the Examination in Public.

The following comments are related to:

- Policy H1: Housing Provision
- Policy HP2: New Small-Scale Development outside the Urban Areas
- Policy HP4: Five-year Housing Land Supply
- Policy HP5: Provision of Affordable Housing
- Policy HP9: Self and Custom Build Houses
- Policy NE2: Biodiversity Net Gain
- Policy HA1: North and South of Greenaway Lane
- Policy HA15: Beacon Bottom West, Park Gate
- Policy HA27: Land off Rookery Avenue
- Policy HA34: Sovereign Crescent

Policy H1: Housing Provision

The policy is not sound as it is not consistent with national policy.

Housing Requirement

Paragraph 4.2

The paragraph sets out how the housing need is determined through the use of the standard methodology set out in National Planning Practice Guidance (PPG). Under this method the housing need for Fareham currently stands at a minimum 514 dwellings per annum (dpa), the Council have

**Unit 1, Station Industrial Park, Duncan Road,
Park Gate, Southampton SO30 1BX**
0330 333 7365 foremanhomes.co.uk

Foreman Homes Limited registered in England Company no 03313213



not however, adopted this method in calculating the housing need. As it is rightly said, in August 2020 the Government released a consultation on a new standard methodology and this is how the housing requirement has been calculated. This methodology is, however, yet to be adopted and therefore the resultant identified housing requirement figure set out in the policy falls way below what is currently required to accommodate the growing need in the Borough (as per the current standard methodology). Due to this shortfall, the policy is contrary to paragraph 60 of the National Planning Policy Framework which states that the strategic policies should be informed by a local housing need assessment, conducted using the standard method in the NPPG, and therefore the Council's approach to calculating housing need is incorrect and considered unsound.

Housing Supply

Paragraph 4.8

The paragraph sets out that in order to meet the requirement, the Council have taken into account existing commitments including applications that have 'resolution to grant' which equate to 4,858 (including Welbourne). The latest Five Year Housing Land Supply Position (June 2020) sets out that Planning Inspectors found that applications with a 'resolution to grant planning permission' are not considered deliverable in terms of the definition set out in Annex 2 of the NPPF. The sites with resolution to grant, except for those that relate to allocated housing sites within the Council's adopted Local Plan, should not be included in the five year housing land supply calculations. A number of sites are dependent on nutrient neutrality solutions, and although these are now starting to come forward there is no guarantee these sites will be deliverable. It is not clear as to whether these figures have been removed from the projected land supply calculation in the Local Plan 2037, but if they haven't these numbers need to be adjusted to reflect the projected housing land supply.

Housing Provision

Paragraph 4.19

The paragraph sets out a number of previous housing allocations that have been removed as they are considered to be no longer available or suitable. Not all sites have been examined as part of these comments, however, the removal of allocations HA16 (Military Road) and HA20 (North Wallington and Standard Way) is considered unjustified (Appendix 1). These sites are available and are also suitable for development in the short term, these sites were identified in the SHELAA as being suitable, available and achievable (Appendix 2). There has been no change in circumstances since



these sites were allocated in the previous iteration of the plan, therefore they should not be removed. There are live applications for both sites (ref: P/19/0130/OA and P/19/0894/OA). The allocation site HA16 would contribute 26 self-build dwellings and HA20 would provide 29 dwellings towards the housing numbers. These sites are important in bringing forward housing numbers to meet Fareham's land supply. The de-allocation of the self-build site is contrary to policy 61 of the NPPF which states that "housing need for different groups (including those wishing to commission or build their own homes) should be assessed and reflected in planning policies". The removal is also contrary to the self and custom build requirement that the Council promotes in Policy HP9 which identifies a need for these dwellings in the Borough. The proposed developments include the provision of both market and affordable units the removal of the allocation is again contrary to paragraph 61 of the NPPF. The removal of these sites is unjustified and will result in the loss of much needed housing, including affordable and self-build, the policy is therefore considered unsound.

Conclusions on Policy H1

The Policy is not sound as considered on the basis that:

- It uses a standard method for assessing housing need that is still out to consultation and potentially subject to change.
- It is not clear as to whether the calculated land supply includes applications which have resolutions to grant, if sites have been incorporated numbers should be adjusted to remove these permissions in accordance with the definition of "deliverable" as set out in the NPPF.
- The removal of allocated sites HA16 and H20 is unjustified as they were previously considered by the Council to be suitable and deliverable and there have been no changes in circumstances.

Policy HA1: North and South of Greenaway Lane

The policy is sound as it is consistent with national policy

The allocation allows for 824 dwellings which make a significant contribution towards the five year housing land supply. The policy is consistent with Paragraph 61 which states the housing needed for different groups in the community should be assessed and reflected in the planning policies, the strategic development will allow for the provision of a different size, type and tenure of houses which will accommodate different groups. The policy is also compliant with paragraph 67 of the NPPF which states "*Planning policies should identify a supply of a) specific, deliverable sites for years one to five*



of the plan period and b) specific, developable sites or broad locations for growth for 6-10 and where possible for years 11-15 of the plan.” The site specific policies are positively prepared and effective in accordance with paragraph 35 of the NPPF. The allocation sets out housing numbers which have been incorporated into the five year housing land supply calculations and it is therefore considered essential in bringing forward housing numbers over the plan period.

Foreman Homes have submitted two outline applications on two parcels of land on the northern side of Greenaway Lane. An outline application for the land to the east of Brook Lane (ref: P/17/0845/OA) for the development of up to 180 dwellings with access off Brook Lane has a resolution to grant planning permission. The second application was submitted in 2018 and for residential development of up to 80 dwellings on the site known as land to the west of Lockswood Road (ref: P/18/0590/OA). Both sites are developable and available in the short term and can be built out within years one to five of the plan period once planning permission is granted.

Policy HA15: Beacon Bottom West, Park Gate

The policy is sound as it is consistent with national policy

The allocation allows for 29 dwellings which make a significant contribution towards the five year housing land supply. The policy is consistent with Paragraph 61 which states the housing needed for different groups in the community should be assessed and reflected in the planning policies, the development will allow for the provision of a different size, type and tenure of houses which will accommodate different groups. The policy is also compliant with paragraph 67 of the NPPF (as set out above). The site specific policies are positively prepared and effective in accordance with paragraph 35 of the NPPF. The allocation sets out housing numbers which have been incorporated into the five year housing land supply calculations and it is therefore considered essential in bringing forward housing numbers over the plan period.

There is a current planning application for 29 dwellings (P/18/1258/FP) which meets the policy requirement and is supported by the Council. The site is developable and available in the short term and can be built out within years one to five of the plan period once planning permission is granted.



Policy HA27: Land off Rookery Avenue

The policy is sound as it is consistent with national policy

The allocation allows for 32 dwellings which make a significant contribution towards the five year housing land supply. The policy is consistent with Paragraph 61 which states the housing needed for different groups in the community should be assessed and reflected in the planning policies, the development will allow for the provision of a different size, type and tenure of houses which will accommodate different groups. The policy is also compliant with paragraph 67 of the NPPF (as set out above). The site specific policies are positively prepared and effective in accordance with paragraph 35 of the NPPF. The allocation sets out housing numbers which have been incorporated into the five year housing land supply calculations and it is therefore considered essential in bringing forward housing numbers over the plan period.

There is a current planning application for 32 dwellings (P/19/0870/FP) which meets the policy requirement and is supported by the Council. The site is developable and available in the short term and can be built out within years one to five of the plan period once planning permission is granted. The site is defined as brownfield land, therefore development would make effective use of the land and policy is supported by the NPPF Paragraph 117-119.

Policy HA34: Sovereign Crescent

The policy is sound as it is consistent with national policy

The allocation allows for 38 dwellings which make a significant contribution towards the five year housing land supply. The policy is consistent with Paragraph 61 which states the housing needed for different groups in the community should be assessed and reflected in the planning policies, the development will allow for the provision of a different size, type and tenure of houses which will accommodate different groups. The policy is also compliant with paragraph 67 of the NPPF (as set out above). The site specific policies are positively prepared and effective in accordance with paragraph 35 of the NPPF. The allocation sets out housing numbers which have been incorporated into the five year housing land supply calculations and it is therefore considered essential in bringing forward housing numbers over the plan period.



There is a resolution to grant an application for 38 dwellings (P/18/0484/FP) which meets the policy requirement and is supported by the Council. The site is developable and available in the short term and can be built out within years one to five of the plan period once planning permission is granted.

Policy HP2: New Small-scale Development

The policy is not sound as it is not consistent with national policy.

The overarching principle of this policy is supported, however, the policy as it is currently written is not consistent with national policy. Paragraph 122 and 123 of the NPPF set out that planning policies should support development that makes efficient use of land in order to meet as much of the identified need for housing within the area. The restriction of 4 dwellings on sites on the edge of urban areas may not be constructive to making efficient use of the land as some sites may be able to accommodate more. It is suggested that the threshold be increased to 10 units which would reflect the definition of a minor development as set out in Annex 2 of the NPPF.

Paragraph 5.16

Paragraph 5.16 supports Policy HP2 (New Small-Scale Development Outside the Urban Area) and sets out what is considered to be sustainable in relation to walking distances from the site to nearby facilities. These criteria are based only on walking and not cycling distances, which should be considered as it is another form of transport that the Council is promoting. The distances set out in the criteria should be based on the Manual for Streets which sets out what is considered to be sustainable:

- 800m is a comfortable walking distance.
- 2km is a reasonable walking distance.
- Cycle distance has a range up to 5 miles.

Recommendations

The threshold of not more than 4 dwellings should be amended to a threshold of not more than 10 dwellings.

Walking distances set out in the policy should be changed to be in line with the Manual for Streets. Cycling distances should also be considered as cycling is promoted as a sustainable alternative to the



use of a car. If the distances are set to those currently suggested in the draft plan, a number of sustainable sites will be discounted and the policy would not make sufficient use of land

Conclusions on Policy HP2

Although the Policy is generally supported, as it is written it is currently considered to be unsound:

- The limit of 4 dwellings is not constructive to making the most efficient use of land as set out in paragraphs 122 and 123 of the NPPF
- Sustainable distances only consider walking distances and not cycling or multi modal trips.

Policy HP4: Five-year Housing Land Supply

The policy is sound as it is consistent with national policy

Policy is positively prepared and justified and is consistent with paragraph 35 of the NPPF. The policy reflects the existing policy DSP40 of the Local Plan Part 2 which has allowed for the delivery of dwellings towards the housing land supply of the borough. The continuation of this approach to providing housing land supply is considered appropriate and pro-active. This will allow for a contingency plan if the developments set out in Policy HP1 do not come forward within the plan period and the 5 year housing land supply falls short.

Policy HP9: Self and Custom Build Houses

The policy is unsound as it has not been justified

Although it is agreed that provisions should be made for self and custom build dwellings and applications should be supported in principle, the requirement for sites over 40 to set aside 10% of dwellings is unjustified and inconsistent with national policy.

The requirement would place burdens on house builders which may not be justified. The Self and Custom Build Background Paper suggests that a significant proportion of sites were met through windfall sites and this is likely to continue. Evidence therefore suggests that the Council, through normal development management processes, is supporting sufficient plots to come forward without imposing a requirement on major developments. In addition, Policy H2 will support the delivery of additional sites that will be more attractive to both self and custom build housing. If the demand is being met by smaller sites, as it currently is, there is no requirement or justification to rely on major housing developments, which are likely to be less attractive. The requirement for a developer to wait



12 months before selling a dwelling as it is not required as a self-build is unjustified and reduces the amount of housing available on the open market and as a result reduce housing figures.

Conclusion of Policy HP9

The policy is unjustified and is not positively prepared in accordance with paragraph 35 of the NPPF. The policy is not required there should be deleted.

Strategic Policy E1: Employment Land Provision

The policy is unsound as it is not in accordance with national policy

The policy sets out there is a requirement of 104,000m² of new employment floor space required over the plan period and this will be provided over three sites. It is suggested that there is a need for a contingency plan in case these sites do not come forward to meet the required space. A number of employment allocations, which were allocated in the previous iteration of the draft local plan, have been removed which is considered to be unjustified as they were considered sustainable and deliverable and key to bringing forward much needed employment space. It is argued that further sites should be allocated to ensure there is no shortfall if the allocated sites do not come forward or are not suitable for the needs of future employers.

The employment allocation E5 (Standard Way, Appendix 3) included in the previous edition of the emerging Local Plan 2037 was identified as a site that could provide 2000m² of flexible employment floor space. This site was identified in the SHELAA as being suitable, available and achievable (Appendix 4). There has been no change in circumstances since these sites were allocated in the previous iteration of the plan, therefore they should not be removed. The site is still available and developable which is evident through the live application on site – P/19/0196/OA.

Conclusion of Policy E1

The reliance on three allocations does not allow for flexibility if these sites do not come forward. The floorspace required over the plan period does not take into consideration fluctuation in the employment market, therefore, further allocations should be included in the policy.

Policy NE2: Biodiversity Net Gain

The policy is unsound as it is not in accordance with national policy

Policy reflects the Government's suggestion that new development should improve the biodiversity on their site to show a 10% net gain over the pre-development baseline. Whilst it is recognised that this is the Government's current favoured position, it is likely that there will be transition period to allow the development industry to adapt to the proposed changes. As such, it is suggested that the policy remains consistent with paragraph 170 of national policy to seek net gains in biodiversity and not include the requirement to show a 10% net gain. A policy without a specific percentage requirement would be consistent with current policy and should the relevant legislation be enacted, as currently proposed, such a policy would be sufficiently flexible to support a 10% requirement and any transition period.

Conclusion of Policy NE2

Although policy reflects the Government's current favoured position a percentage requirement should not be set as it is contrary to paragraph 170 which does not set out a specific percentage.

Conclusion

At present it is not considered that the plan is sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, for the following reasons:

- Housing needs have not been assessed in accordance with standard methodology as set out in the PPG;
- It is not clear as to whether the calculated land supply includes applications which have resolutions to grant, if sites have been incorporated, numbers should be adjusted to remove these permissions in accordance with the definition of "deliverable" as set out in the NPPF.
- The removal of allocated sites is unjustified
- Policy H2 is inconsistent with national policy with regard to making the most effective use of land;
- Requirement for 10% of plots on sites over 40 units be allocated for self-builders is unjustified;

A number of policies are considered sound in accordance with paragraph 35 of the NPPF in that they are positively prepared, justified and effective. These include:

- Policy HA1: North and South of Greenaway Lane



- Policy HA15: Beacon Bottom West, Park Gate
- Policy HA27: Land off Rookery Avenue
- Policy HA34: Sovereign Crescent
- Policy HP4: Five-year Housing Land Supply

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully,

Katherine Richards BSc MSc MRTPI



**Unit 1, Station Industrial Park, Duncan Road,
Park Gate, Southampton SO30 1BX**
0330 333 7365 foremanhomes.co.uk

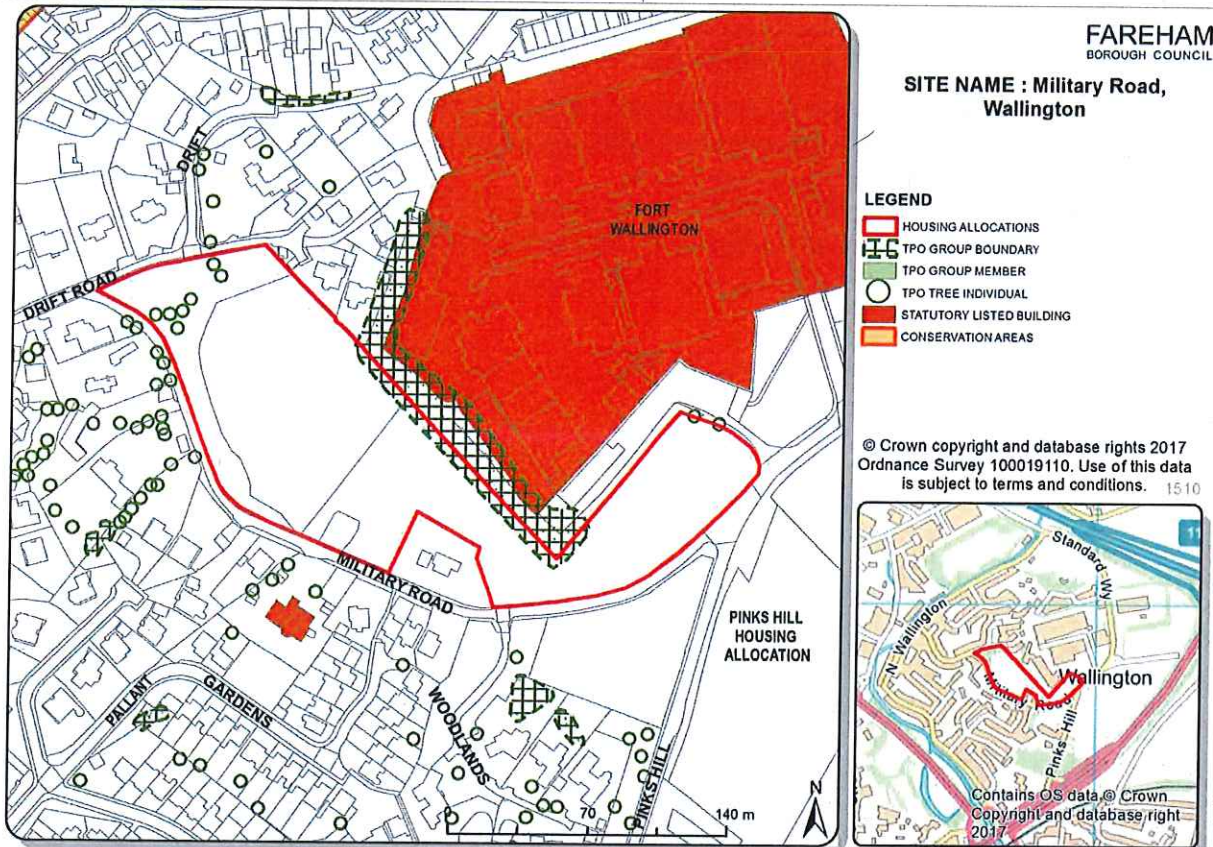
Foreman Homes Limited registered in England Company no 03313213

Appendix 1: Allocations HA16 and H20 removed from the Local Plan

DEVELOPMENT ALLOCATIONS



Housing Site: HA16	SHLAA Reference: 27
Name: Military Road	Proposed Use: Self and Custom Build
Location: Wallington	Capacity: 26 dwellings
Size: 2.2 ha	Planning Status: None



Planning permission will be granted provided that detailed proposals accord with the policies in the Local Plan and meet the following site specific requirements:

- a) The provision of land for self and custom build housing, to include the provision of serviced plots; and
- b) Provision of an illustrative masterplan to identify the layout of individual plots;
- c) The quantum of housing proposed is broadly consistent with the indicative site capacity; and
- d) Primary highway access shall be focused from Military Road; and
- e) Building heights shall be limited to a maximum of 2 storeys; and
- f) Safe pedestrian and cycle access and crossing points from the site to Pallant Gardens, Drift Road and Pinks Hill housing allocation (HA8); and
- g) Existing trees subject to a Tree Preservation Order should be retained and incorporated within the design and layout of proposals in a manner that does not impact on living

DEVELOPMENT ALLOCATIONS



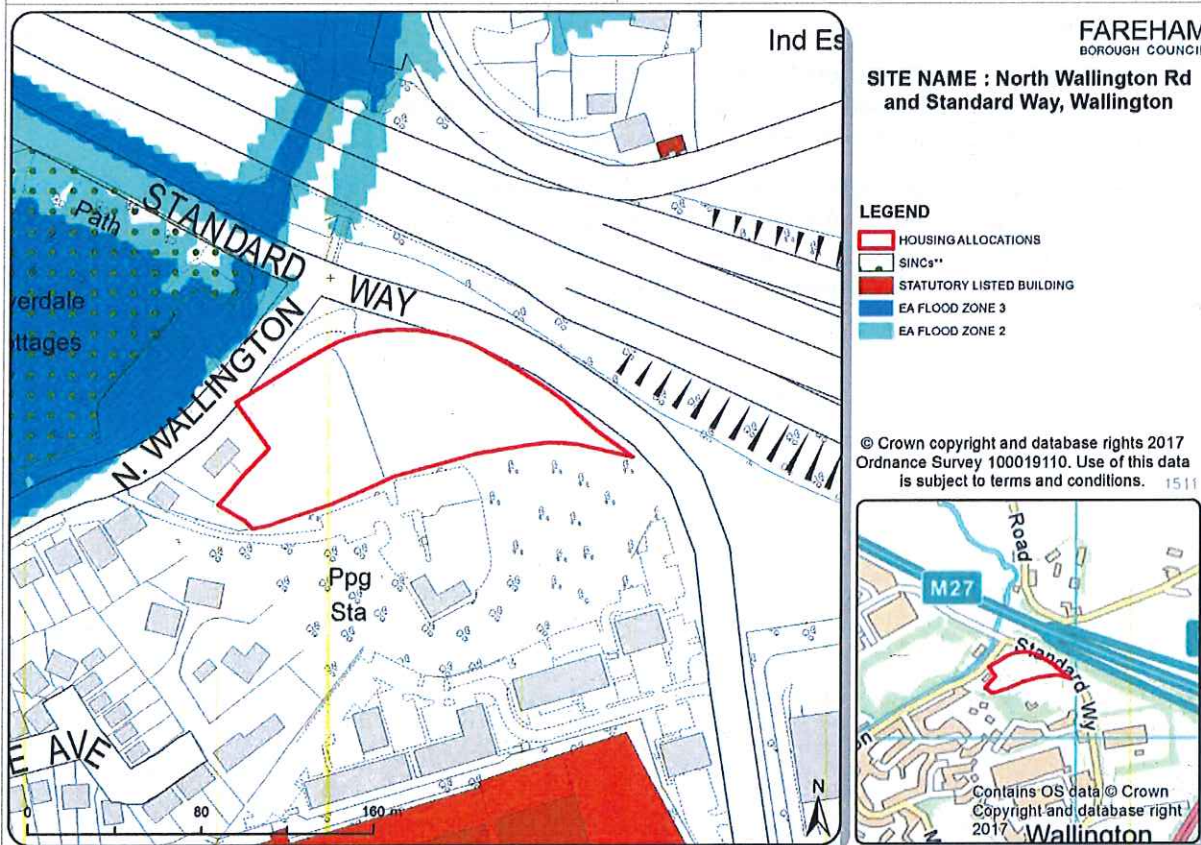
conditions or prevent damage to any nearby dwellings, roads, footpaths or other infrastructure; and

- h) A Heritage Statement shall accompany any application to provide details on the potential impact of proposals on the conservation and setting of the Fort Wallington façade; and
- i) Proposals shall demonstrate that the development will have no adverse impacts upon groundwater in respect of its location in Zone 1; and
- l) Proposals shall either provide directly, or provide a financial contribution towards the delivery (and maintenance where deemed necessary) of the following infrastructure, in line with the Council's Planning Obligations SPD:
 - Off-site highway improvement and mitigations works; and
 - Local schools and early-years childcare infrastructure (as identified by the Local Education Authority); and
 - On-site open space which shall be provided on the eastern part of the site in order to provide an appropriate setting to the Fort Wallington façade.

DEVELOPMENT ALLOCATIONS



Housing Site: HA20	SHLAA Reference: 324
Name: North Wallington and Standard Way	Proposed Use: Residential
Location: Wallington	Indicative Capacity: 21 dwellings
Size: 0.87 ha	Planning Status: None



Planning permission will be granted provided that detailed proposals accord with the policies in the Local Plan and meet the following site specific requirements:

- The quantum of housing proposed is broadly consistent with the indicative site capacity; and
- Primary highway access shall be focused from North Wallington; and
- The height of buildings shall be limited to a maximum of 2 storeys; and
- The design and layout of proposals shall retain and strengthen the existing tree boundary located along the southern perimeter of the site. The existing trees and hedgerows shall also be retained along North Wallington and Standard Way frontage except where access points may be required; and
- Proposals will need to minimise any impact upon the amenity of the adjacent pump house residences; and
- Proposals shall include a safe pedestrian and cycle crossing point of North Wallington

DEVELOPMENT ALLOCATIONS



to/from the site with Standard Way; and

- g) A noise assessment shall accompany an application for residential development to assess the level of noise from the M27. The design and layout of proposals must take account of any noise mitigation measures that are identified by the assessment; and
- h) Provision of an air quality assessment to identify appropriate on-site measures to mitigate NO₂ emissions arising from the M27 (in accordance with Policy INF2); and
- i) Proposals shall demonstrate that the development will have no adverse impacts upon groundwater in respect of its location in Zone 1; and
- j) Proposals shall either provide directly, or provide a financial contribution towards the delivery (and maintenance where deemed necessary) of the following infrastructure, in line with the Council's Planning Obligations SPD:
 - Off-site highway improvement and mitigations works; and
 - Local schools and early-years childcare infrastructure (as identified by the Local Education Authority); and
 - Enhancements to existing off-site open space.

Appendix 2: SHELAA Site 27 (Military Road) and Site 324 (North Wallington and Standard Way)

5. Developable Housing Site Assessments

SITE DETAILS		Developable Housing Site	Fareham East
ID:	27	Site Name: Military Road, Wallington	
Current Land Use:	Paddock		
Surrounding Land Use:	Residential to north and along south boundary. Employment (Fort Wallington) to northeast (Grade II Listed Building)		
Gross Site Area (ha):	2.17	Housing Yield (estimate):	26
Employment Yield (estimate):	0	Gypsy and Traveller Pitches (estimate):	0
SUITABILITY			
Constraints:	Public ROW, Agricultural Land Grade 2, Minerals and Waste 2016 Brick Clay and Superficial sand/gravel, Within 500m of SPA, Within 500m of Ramsar, Within 500m of SSSI, TPOs, Ground Water Protection Zone, Countryside		
Highways/ Pedestrian Access:	Access via Drift Road would be unsuitable. Improvements to the Military Road/ Pinks Hill junction would be required but is considered feasible. Pinks Hill would require improvement to the A27 slip road. Pedestrian and cycle connections would be required to link the site to local services.		
Conservation Comments:	Fort Wallington is a grade II listed building. One of a series of forts built in the 19th century for the defence of Portsmouth Harbour. The south facing curtain wall survives, development of the eastern area would harm the setting of the listed building. The existing northern boundary marks the line of the fort perimeter, retaining a break to define the outline of the former fort would be preferable.		
Noise/Air Quality Assessment:	A noise assessment would be required given the sites proximity to Fort Wallington Industrial Estate but otherwise unlikely to be any issues in this regard.		
Archaeology:	Site not within identified area of archaeological potential.		
Ecology Comment:	Site provides good habitat for notable invertebrate and supports dormice and reptiles. Bat flight line connectivity between wooded habitats and flight line/grazing/roosting habitat for intertidal grazing birds. Woodland should be maintained and any introduced gaps should minimise loss of connectivity. Lighting strategy should leave edges dark.		
Accessible Facility Types: 7/10	Within 1600m of a Secondary School, within 800m of a Convenience Store or Supermarket, within 1200m of a GP Surgery, within 1600m of a Major Employment Areas, within 800m of a Accessible Green or Play Space, within 1600m of a Town/District or Local Centre, within 800m of a Community/Leisure Facility		
Suitability Comment:	Suitable highways improvements required. Development must have regard to TPOs, Listed Building and ecological potential. Proximity of Fort Wallington Industrial Estate with regards to noise impact should be considered.		
Is the site suitable?	Yes	Is the site available?	Yes
		Is the site considered achievable?	Yes

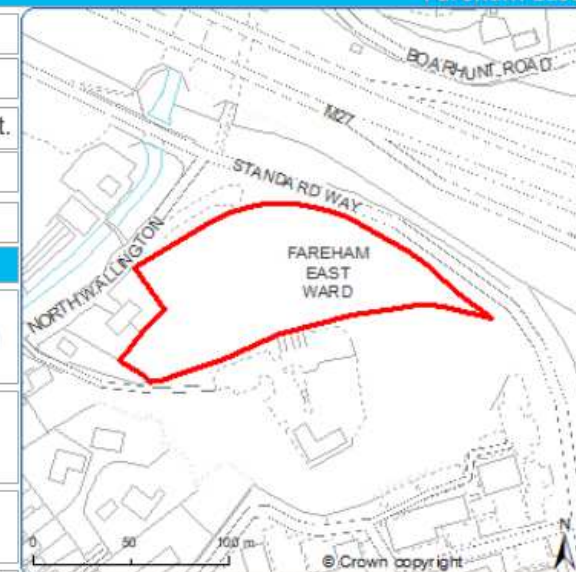


SITE DETAILS	Developable Housing Site	Fareham East
--------------	--------------------------	--------------

ID:	324	Site Name:	North Wallington Rd and Standard Way, Wallington	
Current Land Use:	Agricultural Land			
Surrounding Land Use:	SINC to the west, residential and commercial to the south. M27 to the north and road frontage to the east.			
Gross Site Area (ha):	0.87	Housing Yield (estimate):	21	
Employment Yield (estimate):	0	Gypsy and Traveller Pitches (estimate):	0	

SUITABILITY

Constraints:	Public ROW, Agricultural Land Grade 2, Minerals and Waste 2016 Brick Clay, Superficial sand/gravel and Safeguarded Site, Ground Water Protection Zone, Countryside, Within 50m of potentially infilled and gassing ground, groundwater source protection zone.
Highways/ Pedestrian Access:	It is considered that a suitable access can be created onto Standard Way or North Wallington Road. An assessment of the capacity of North Wallington Road to accommodate additional traffic should be undertaken.
Conservation Comments:	No known constraints
Noise/Air Quality Assessment:	Site is in close proximity to the motorway and therefore noise issues would need to be addressed. Noise and air quality assessments required.
Archaeology:	Site not within identified area of archaeological potential
Ecology Comment:	Development should buffer woodland margins and scrub. Scrub at margins likely to support reptiles and invertebrates, possible notable plants.
Accessible Facility Types: 5/10	Within 800m of a Convenience Store or Supermarket, within 1600m of a Major Employment Areas, within 800m of a Accessible Green or Play Space, within 1600m of a Town/District or Local Centre, within 800m of a Community/Leisure Facility
Suitability Comment:	Site suitable for residential development subject to appropriate mitigation measures to address noise issues.



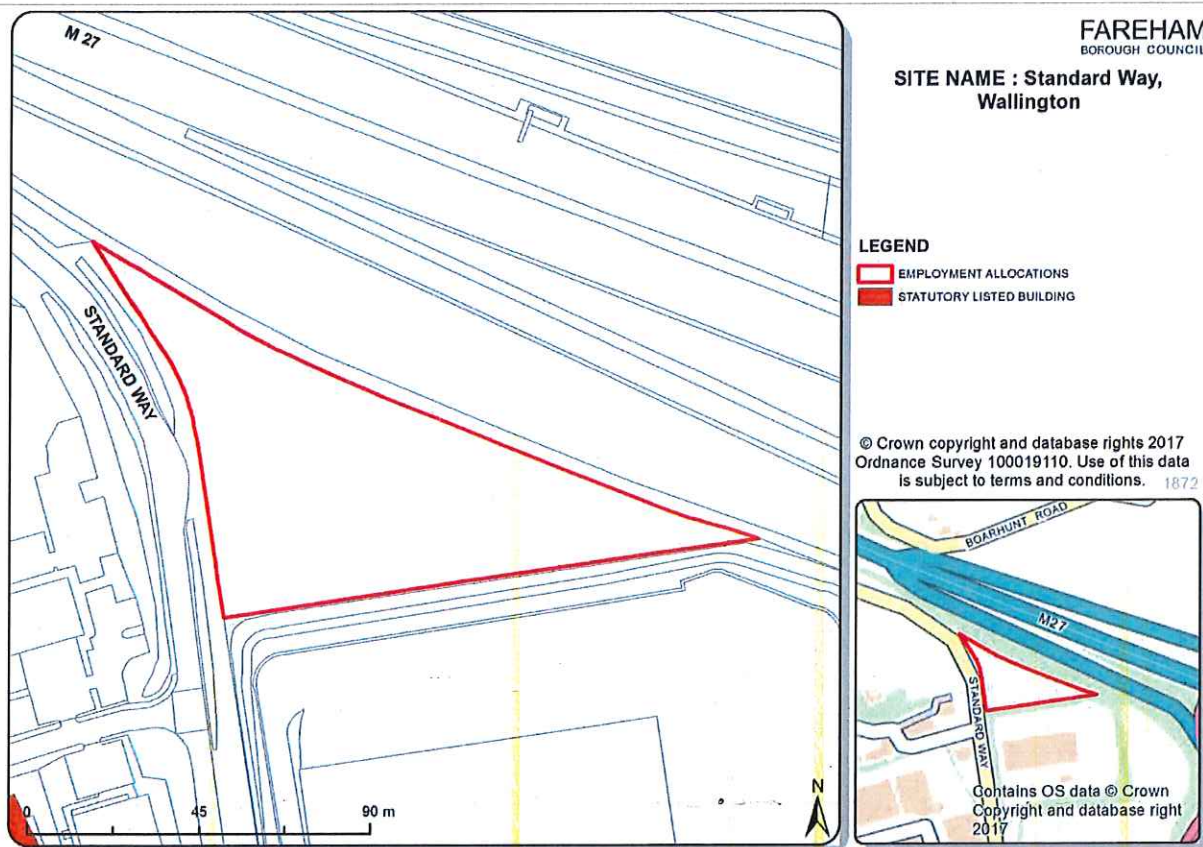
Is the site suitable?	Yes	Is the site available?	Yes	Is the site considered achievable?	Yes
-----------------------	-----	------------------------	-----	------------------------------------	-----

Appendix 3: Allocation E5 removed from the Local Plan

DEVELOPMENT ALLOCATIONS



Employment Site: E5	SELAA Reference: 20
Name: Standard Way	Proposed Use: Employment (B1, B2 or B8)
Location: Standard Way, Wallington	Capacity: 2,000 sq. metres
Size: 0.6 ha	Planning Status: None



Planning permission will be granted provided that detailed proposals accord with the policies in the Local Plan and meet the following site specific requirements:

- The quantum of employment floorspace shall be broadly consistent with the indicative site capacity; and
- Primary vehicular access shall be obtained from Standard Way; and
- Provision of safe pedestrian and cycle connections from the site and along Standard Way up to the junction with North Wallington; and
- Provision of a noise assessment that identifies appropriate mitigation to address noise from the A27, M27 and neighbouring industrial area; and
- Provision of an air quality assessment to identify appropriate measures to mitigate NO₂ emissions arising from the development in accordance with Policy INF2; and
- Boundary vegetation and trees should be retained, apart from where removal is necessary for highways safety reasons; and

DEVELOPMENT ALLOCATIONS

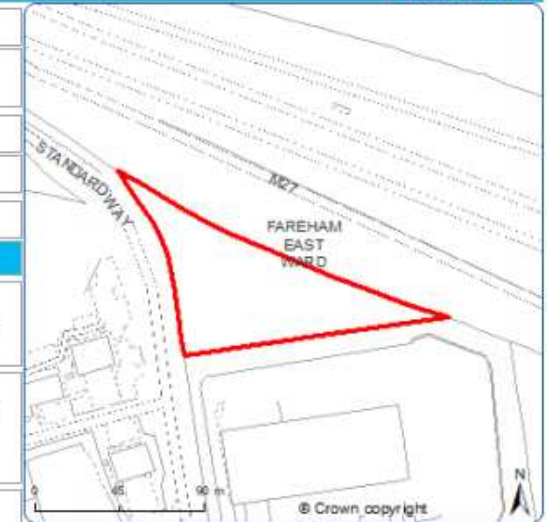


- g) Proposals shall either provide directly, or provide a financial contribution towards the delivery (and maintenance where deemed necessary) of the following infrastructure:
- Off-site highway improvement and mitigations works.

Appendix 4: SHELAA Site 20 (Standard Way)

7. Developable Employment Site Assessments

SITE DETAILS		Developable Employment Site	Fareham East
ID:	20	Site Name:	Standard Way, Wallington
Current Land Use:	Vacant. Small paddock area located to the north of Standard Way and to the north of Fareham Heights office park. Lined with trees with access off of Standard Way and M27 to north.		
Surrounding Land Use:	Adjoining motorway M27 to northeast; Frontage to Standard Way to west; adjoining WTS to south.		
Gross Site Area (ha):	0.59	Housing Yield (estimate):	0
Employment Yield (estimate):	2,000sqm	Gypsy and Traveller Pitches (estimate):	0
SUITABILITY			
Constraints:	Public ROW, Agricultural Land Grade 2, Minerals and Waste 2016 Brick Clay, Superficial sand/gravel and Safeguarded Site, Ground Water Protection Zone, Countryside, Within 50m of potentially infilled and gassing ground, groundwater source protection zone.		
Highways/ Pedestrian Access:	This site would appear to have the potential for access created from Standard Way. The junction location would need to be towards the southern end of the frontage for visibility purposes. Measures would also need to be put in place to limit additional commercial vehicle activity on Pinks Hill or to make width improvements along its length.		
Conservation Comments:	No known constraints		
Noise/Air Quality Assessment:	No known issues.		
Archaeology:	There are no archaeological sites currently recorded at this location although Fort Wallington sits within the immediate vicinity. It is in an area that might be regarded as within the field of fire (setting) of the fort, but the fort and the views from t		
Ecology Comment:	The site comprises Priority Habitat Coastal and Floodplain Grazing Marsh with woodland boundaries. Buffers to be retained with significant margins. Appears suitable for bats, badger and may support territory of barn owl.		
Accessible Facility Types:	4/10	Within 1600m of a Major Employment Areas, within 800m of a Accessible Green or Play Space, within 1600m of a Town/District or Local Centre, within 800m of a Community/Leisure Facility	
Suitability Comment:	The site falls within an area that has an overriding 'urban fringe' character, due to the urban character of the adjoining industrial estate and waste transfer. The site lies within a field to the north of the waste transfer station, which is mostly hidden by vegetation, with only occasional glimpses through gateways along Standard Way. Visibility of the site is therefore relatively limited, and visual sensitivity is quite low, whilst strong vegetation cover significantly reduces intrusion from the motorway, and creates an enclosed and attractive parcel of land of lower quality landscape value. Site is suited for either B2 or B8 employment uses.		
Is the site suitable?	Yes	Is the site available?	Yes
		Is the site considered achievable?	Yes



Fareham Local Plan Representation

This representation addresses the soundness of the plan in particular with respect of the Locks Heath and Warsash Area. and where the plan has not met the duty to cooperate with education and health authorities.

The housing proposed for these areas is :-

Development area	Dwellings
HA1 North and South of Greenaway Lane	824
HA7 Warsash Maritime Academy	100
HA13 Hunts Pond Road	38
HA19 399-403 Hunts Pond Rd	16
HA34 Land South West of Sovereign Crescent	38
HA35 Former Scout Hut, Coldeast Way	7
HA36 Locks Heath District Centre	35
HA37 Former Locks Heath Filing Station	30
HA39 Land at 51 Greenaway Lane	5

giving a total of 1093 dwellings.

The employment areas in the plan are in Whiteley and Lee on the Solent.

The developments create a dormitory area where up to 2000 new residents will be commuting. The Lee on Solent areas are too far for many to cycle and over 2 hours to walk. This leaves Whiteley as the nearest employment area, over an hours walk away. There may be a commuting bus route there in the future but there is no provision at present and no land set aside for developing a rapid transit route.

Many of the new residents will be commuting further afield and using the M27. All commuting involves either crossing or using the A27.

Section 10.5 of the plan states “ The Highway Authority Local Cycling and Walking Infrastructure Plan (LCWIP) identifies a network of key walking and cycling routes across the Borough and recommends actions along those routes where improvements are needed”. May be it will when it has been published.

Climate change has brought about many more days of heavy rain and strong winds, and this has been predicted to get worse. People are not going to commit to commuting on foot or by cycle in foul weather. It is inevitable that there will be a large increase in car traffic on the A27 where there are already lengthy queues at rush hour.

Paragraph 10.4 states “10.4 The Highway Authority’s preferred approach to mitigation of highway impacts, is to focus on active and sustainable modes of travel and reducing the need to travel by motor vehicle.” This is at best wishful thinking and a pious hope, and at worst an abdication of responsibility.

In Policy TIN2 the plan states :

Development will be permitted where:

a) There is no unacceptable impact on highway safety, and the residual cumulative impact on the road networks is not severe; and

- b) The impacts on the local and strategic highway network arising from the development itself or the cumulative effects of development on the network are mitigated through provision of improvements and enhancements to the local network or contributions towards necessary or relevant off-site transport improvement schemes.

Given the geography of the area it is inevitable that development of this scale will have a severe cumulative impact on the road network, which at times is already exceeding its capacity. Without positive effort by the Highway Authority policy TIN2 would stop all the development if it is honestly applied.

There is no mention of retail provision in this area. Almost nobody would be prepared to carry the weekly shopping very far, and there will be need for more parking in Warsash centre and the Locks Heath centre. HA36 and HA37 actually reduce the parking area available in Locks Heath, in addition HA36 takes away much of the parking used by the elderly visiting the health centre and the day care facility.

The increase in population will create more demand for school places within walking distance of the housing development for primary schools and cycling distance for secondary schools if the 'school run' is to be prevented. There is no land set aside to this provision and no evidence that the Education Authority has been consulted.

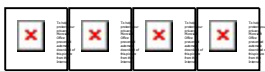
The increase in population will place more burden on the local doctors, and more load on the hospitals. There is no land set aside for any further GP provision or patient parking. There is no evidence of consultation with the care providers.

The national policy is for all new cars to be electric by 2030. For this policy to work all cars will need access to a charging point. Providing just one point per dwelling with off street parking is insufficient, there needs to be one for each car parking space dedicated to a dwelling.

Keely, Lauren

From: Consultation
Sent: 18 December 2020 09:35
To: Planning Policy
Subject: Gillings Planning reg 19 response
Attachments: Local Plan Reps Policy HA31 December 2020 Final.pdf; Questionnaire.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Laura Grimason [REDACTED]
Sent: 17 December 2020 18:41
To: Consultation <Consultation@fareham.gov.uk>
Cc: Anna Gillings <[REDACTED]>
Subject: Consultation Response - HA31 Hammond Industrial Estate.

Good evening,

Please see attached a consultation response on the publication version of the new Local Plan. This response relates specifically to policy HA31: Hammond Industrial Estate.

I'd be grateful if you could confirm receipt of this at your earliest convenience and look forward to hearing from you.

Kind Regards.
Laura

Laura Grimason

Associate Director
Gillings Planning



Gillings
Planning

This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Gillings Planning Ltd, registered in England and Wales. Registered No 10778690. Registered Office Gillings Planning, 2 Wessex Business Park, Colden Common, Winchester, Hampshire, United Kingdom, SO21 1WP

17th December 2020

REF: FRON1065

The Consultation Team,
Fareham Borough Council,
Civic Offices,
Civic Way,
Fareham,
PO16 7AZ

Sent by email: consultation@fareham.gov.uk

Dear Sir / Madam,

RE: Representation on the Publication Version of the Local Plan – Site HA31: Hammond Industrial Estate, Stubbington.

I act on behalf of Frontier Estates (FAR) Limited who have an ongoing interest in the above site and write in response to the current consultation on the Fareham Local Plan 2037. I trust that these representations, duly made within the determined timescales, will be formally accepted and considered alongside the submitted questionnaire.

Background to the site

By way of background, a pre-application enquiry for the redevelopment of the site to provide a care home was submitted to FBC on the 16th October 2019 under reference Q/023319. Meetings to discuss this pre-app were held on the 21st November 2019 and the 17th March 2020. These meetings confirmed that the principle of development would be acceptable.

A call for sites form promoting the site for provision of a care home was submitted to FBC in April 2020. Additional information further to the evolution of the scheme following pre-application discussions was submitted in October 2020. This update suggested the number of bedrooms increase to 68 from 64.

Public consultation was undertaken in November 2020 and included leaflet distribution to 252 local residents; a dedicated project website; and a Survey Monkey Survey for comments to be provided.

A planning application will be submitted to FBC on the 18th December 2020 for the following proposed development:

‘Demolition of existing buildings and erection of a care home (within Class C2). Proposal includes provision of a substation, parking, access, landscaping and other associated works’.

For clarity, the planning application seeks permission for a 68-bed care home set across 2.5 storeys.

Comments on proposed policy HA31: Hammond Industrial Estate

On behalf of Frontier Estates (FAR) Limited, I write to support proposed site allocation HA31: Hammond Industrial Estate. I do however, respectfully request that the following comments on the detail of this allocation policy are reflected in the final draft of the submission plan for formal examination by the Planning Inspectorate in due course.

1. Red Line Boundary and Site Area

At present, the red line boundary in allocation policy HA31 incorrectly includes the residential dwellings at no.129 - 135 Stubbington Lane to the north of the Hammond Industrial Estate site. The land which should not be included is highlighted in yellow below:



Figure 1: Area incorrectly included in allocation policy shown in yellow.

Whilst this land is currently within the same ownership as the Hammond Industrial Estate site, the existing dwellings at no, 129 – 135 Stubbington Lane are to remain in residential use. They do not form part of the contract red line that has been agreed between the current landowner and Frontier Estates (FAR) Limited as part of the land transfer for the site associated with both the planning application and the site allocation. The correct red line for the site is shown below and includes an area covering 0.4ha:

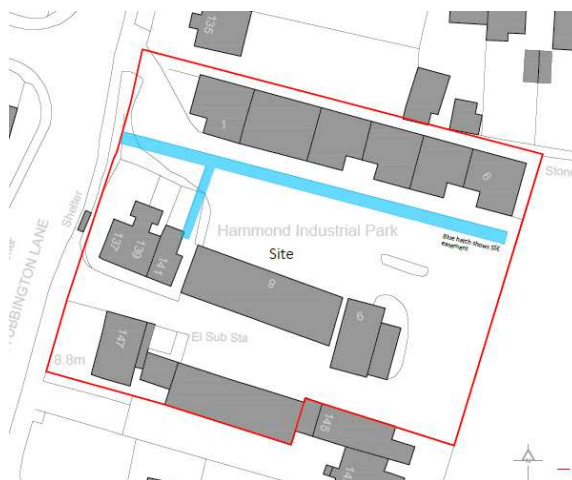


Figure 2: The correct red line for the site.

The site plan for submission with the planning application is shown below and reflects the red line shown in Figure 2.

Point g) refers to the need for a contamination assessment due to the site's close proximity to Solent Airport. It is not considered relevant to specify Solent Airport in this point and so we respectfully request that point h) is amended to read as follows:

'g) A Contamination Assessment demonstrating no unacceptable adverse impact on future occupiers and users of the development shall accompany any application; and'

Point i) refers to the need for a Construction Environment Management Plan. It is noted that this is something that is normally secured through planning condition and we respectfully request that this is reflected in point i) as follows:

'i) A Construction Environmental Management Plan to avoid adverse impacts of construction on the Solent designated sites shall be secured through an appropriately worded planning condition; and'

Point k) refers to infrastructure provision and specifies health, education and transport. We note that the relevant infrastructure provision and contributions will be determined on a case by case basis and will depend on the nature of development proposed. Notwithstanding, it should be noted that Class C2 care home uses do not give rise to a demand for education and so it is respectfully requested that reference to education is removed from point h). Furthermore, the reference to NE3 relates to the Solent Disturbance Mitigation Project which is considered to be irrelevant in this case. Again, C2 care homes do not give rise to additional recreational pressure due to:

- The advanced needs of residents making them unable to leave unaccompanied in most cases;
- The provision of garden space on site for residents (which fulfils their recreational needs); and
- The absence of pets.

As such, it is respectfully requested that point k) is amended to read as follows:

'k) Infrastructure provision and contributions including but not limited to health and transport shall be provided in line with Policy TIN4'.

Conclusion

I trust that this submission is useful in confirming my clients overall support for policy HA31 for the provision of a C2 care home and respectfully request that the minor amendments referred to above are accounted for in the final draft of the submission plan for formal Examination by the Planning Inspectorate in due course. These points are considered to be important as they reflect the optimum use of this previously developed site in response to an identified local need for care beds. It is demonstrated in the planning application submission that a 68-bed care home on the red line shown in Figure 2 can comfortably be accommodated in compliance with the site-specific points listed in policy HA31.

We look forward to engaging further in the process and would be grateful if you could keep us updated with regards to the emerging Fareham Local Plan 2037, and its timetable for preparation. In the meantime, please do not hesitate to contact me to discuss further.

Yours Faithfully



Laura Grimason
Associate Director

laura@gillingsplanning.co.uk

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?



Yes



No

A2 Please provide your details below:

Title:

C/O Gillings Planning

First Name:

C/O Gillings Planning

Last Name:

C/O Gillings Planning

Job Title: (where relevant)

C/O Gillings Planning

Organisation: (where relevant)

Frontier Estates (FAR) Limited

Address:

C/O Gillings Planning

Postcode:

C/O Gillings Planning

Telephone Number:

C/O Gillings Planning

Email Address:

C/O Gillings Planning

A3 Please provide the Agent's details (if applicable):

Title:

Ms

First Name:

Laura

Last Name:

Grimason

Job Title: (where relevant)

Associate Director

Organisation: (where relevant)

Gillings Planning

Address:

2 Wessex Business Park, Colden Common, Winchester

Postcode:

SO21 1WP

Telephone Number:



Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Please see accompanying letter for full response.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Please see accompanying letter for full response.

B4c Your suggested revised wording of any policy or text:

Please see accompanying letter for full response.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To have the opportunity to take part in the discussion on policy HA31 at the Examination.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

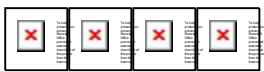
Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Keely, Lauren

From: Consultation
Sent: 16 December 2020 16:39
To: Planning Policy
Subject: Gladman Planning reg 19 response
Attachments: Fareham Local Plan - Presubmission.pdf; Comments form.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: John Fleming [REDACTED]
Sent: 14 December 2020 16:18
To: Consultation <Consultation@fareham.gov.uk>
Subject: Fareham Local Plan - Presubmission consultation

Re: Fareham Local Plan – Presubmission consultation

Please find attached Gladman's response to the above consultation.

Gladman request to be notified of the Plan's progress and request to participate at the hearing session(s) at the Examination in Public.

Yours faithfully,

John Fleming
Policy Planner



T: 01260 288 897 | j.fleming@gladman.co.uk
www.gladman.co.uk



This email (and any attachment) is confidential, may be legally privileged and is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient please do not disclose, copy or take any action in reliance on it. If you receive this message in error please tell us by reply (or telephone the sender) and delete all copies on your system.

Whilst we have taken reasonable precautions to ensure that any attachment to this email has been swept for viruses, we cannot accept liability for any damage sustained as a result of software viruses and would advise that you carry out your own virus checks before opening any attachment. Please note that communications sent by or to any person through our computer systems may be viewed by other Gladman personnel and agents.

Fareham Local Plan

Publication version



December 2020

Page left intentionally blank

CONTENTS

1	Introduction.....	2
1.1	Introduction.....	2
2	National Planning Policy	3
2.1	National Planning Policy Framework.....	3
2.2	Planning Practice Guidance.....	4
2.3	Planning for the Future White Paper	4
3	Legal Requirements	5
3.1	Duty to Cooperate	5
3.2	Sustainability Appraisal.....	6
4	Fareham Local Plan	7
4.1	Vision and Objectives.....	7
4.2	Strategic Policy DS1: Development in the Countryside	7
4.3	Strategic Policy DS2: Development in Strategic Gaps	8
4.4	Strategic Policy H1: Housing Provision.....	9
4.5	Policy HP1: New Residential Development	12
4.6	Policy HP2: New Small-Scale Development Outside the Urban Areas	12
4.7	Policy HP4: Five-Year Housing Land Supply	12
4.8	Policy HP7: Adaptable and Accessible Dwellings	13
4.9	Policy HP9: Self and Custom Build Homes	15
4.10	Policy NE2: Biodiversity Net Gain.....	15
4.11	Policy D5: Internal Space Standards.....	16
5	Overall Conclusions.....	17

1 INTRODUCTION

1.1 Introduction

- 1.1.1 These representations are submitted by Gladman in response to the current consultation held by Fareham Borough Council (FBC) on the proposed submission draft Fareham Local Plan (FLP). Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to decent homes and employment opportunities.
- 1.1.2 Gladman has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of this experience that the comments are made in this representation.
- 1.1.3 Prior to this consultation the Government published the Planning for the Future White Paper setting out proposals for how the Government wants to 'radically reform' the planning system. Central to the Government's proposals will be a simpler, more streamlined Local Plan making process. Consultation on the proposals ended on 29th October 2020. Subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 1.1.4 As the White Paper is only currently under consultation and there is currently uncertainty around timescales for moving towards a new Local Plan making process, this representation has been prepared against the backdrop of the current system. In progressing the FLP under the current system, the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;*
- b) Be prepared positively, in a way that is aspirational but deliverable;*
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing

requirements are addressed and that land with permission is developed without unnecessary delay¹.

- 2.1.4 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

2.3 Planning for the Future White Paper

- 2.3.1 On the 6th August, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 2.3.2 Consultation recently closed on these proposals and it will be important that the Council keeps up to date with the implementation of these changes and the implications this will in turn have on the preparation of any subsequent Local Plan review. Timescales remain uncertain however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 2.3.3 More importantly alongside this consultation, a consultation on immediate changes to the current planning system was also held, closing on the 1st October. Of significant note is a proposed revised standard method for calculating local housing need, which when implemented will be used as the basis for plans created prior to any changes outlined in the White Paper. Introduction of the revised methodology, which proposes to incorporate a percentage of existing stock as the baseline of the calculation, identifies an indicative housing figure of 403dpa for Fareham.

¹ NPPF – Paragraph 60

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.1 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.
- 3.1.2 The NPPF(2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The NPPF(2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process³. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 This issue is particularly crucial for the FLP given the work currently being undertaken through the Partnership for South Hampshire (PFSH) which is seeking to identify Strategic Development Opportunities to meet identified unmet needs across the sub-region.
- 3.1.4 The PFSH is currently working on a new SOCG between all constituent authorities and will effectively supersede the Spatial Position Statement (2016). Paragraph 3.17 of the submission Local Plan confirms that bilateral conversations with neighbouring authorities have been undertaken and the Council is aware of unmet needs arising across the region due to neighbouring borough's capacity to address any unmet need. The Council acknowledges at

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

paragraph 4.4 that there is a significant likelihood of a substantial level of unmet housing needs in the sub-region with figures released in September 2020 suggesting unmet need in the sub-region of circa 10,750 dwellings. This figure is derived from 11 councils who are all at varying stages of plan preparation and based on the current standard methodology.

- 3.1.5 At the time of writing, it is noted that Portsmouth City Council (PCC) have written to the Council requesting a contribution of 1,000 dwellings to assist in meeting their unmet housing needs. Gosport Borough Council (GBC) is also likely to have an issue with unmet housing need, currently estimated to be in the region of 2,500 dwellings.
- 3.1.6 In principle, Gladman support the Council's decision to increase the housing target by 847 dwellings to contribute toward the unmet housing needs issue of the wider area. However, Gladman are concerned that without a signed SOCG between constituent authorities, it is difficult to consider whether this level of housing is sufficient to meet the wider needs of the area. Gladman recommend that a further consultation which considers the outcome of the work of the PfSH will be required so that the Local Plan can reflect the outcome of that process prior to the submission of the Local Plan to the Secretary of State for examination.
- 3.1.7 Since effective cooperation is an ongoing issue, Gladman reserve the right to provide further comments in relation to this matter once further evidence and signed statements become available.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the FLP proposals on sustainable development when judged against all reasonable alternatives. The Council must ensure that the future results of the SA clearly justify its policy choices. In meeting development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. This must be undertaken through a comparative and equal assessment of all reasonable alternatives, in the same level of detail for both chosen and rejected alternatives. The Council's decision making, and scoring should be robust, justified and transparent.

4 FAREHAM LOCAL PLAN

4.1 Vision and Objectives

4.1.1 In principle, Gladman support the Council's vision and objectives. In particular, we support the Plan's commitment to accommodating development to address the need for new homes and employment space in Fareham Borough and the commitment to ensuring a strong and diverse economy is delivered.

4.1.2 Notwithstanding this, it is considered the Plan could go further in its aims to support housing and economic growth of the wider sub-region with reference to assisting neighbouring authorities with any unmet housing needs. This is particularly important due to the ongoing work of the PfSH and outstanding evidence relating to unmet housing needs and how this will be redistributed across the PfSH area.

4.2 Strategic Policy DS1: Development in the Countryside

4.2.1 Strategic Policy DS1 states proposals for development in the countryside, which is defined as land outside the Urban Area boundary, will only be supported in a narrow set of circumstances.

4.2.2 Gladman are opposed to the use of settlement boundaries, as these are often used as an arbitrary tool to prevent otherwise sustainable proposals from going forward. The policy wording as currently drafted only allows for development in a narrow set of circumstances (i.e. replacement dwelling, previously developed land etc.) and does not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in housing supply. Gladman believe that this policy should be modified to a criteria-based policy which will provide a more appropriate mechanism for assessing the merits of individual development proposed, based on their specific circumstances and ability to deliver sustainable development rather than being discounted simply due to a sites location beyond an artificial boundary.

4.2.3 To achieve this; a criteria based approach would allow the plan to protect itself against unsustainable development whilst at the same time offering a flexible solution to the consideration of development opportunities outside these boundaries that are able to come forward to meet identified needs should the Council's housing land supply start to fail. Gladman refer to the submission version of the Harborough Local Plan, Policy GD2, which states:

“in addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of the Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...”

A series of criteria follows.

- 4.2.4 Clearly the policy here would need to reflect the local circumstances of Fareham but it does provide an example of a local authority taking a proactive approach to guiding development and ensuring that it can meet its housing target as well as plan for approaches if and when problems arise over the course of a plan period with regard to the delivery of allocated sites. Accordingly, Gladman recommend the use of a criteria-based policy should be included within the FLP to ensure housing needs are met in full.
- 4.2.5 In addition, the second element of the policy requires proposals to demonstrate that if they require a location outside of the urban area, do not significantly affect the integrity of a Strategic Gap and are not located on Best and Most Versatile (BMV) agricultural land. Gladman are unclear with the necessity of including this additional criteria as these matters are dealt with elsewhere within the FLP and therefore their inclusion in Policy DS1 leads to unnecessary duplication and not in accordance with the NPPF2019. As such, this element of the policy should be deleted as the finer details of each of these issues are dealt with elsewhere within the draft Local Plan.

4.3 Strategic Policy DS2: Development in Strategic Gaps

- 4.3.1 The above policy identifies two Strategic Gaps whereby development proposals would not be permitted where they significantly affect the integrity of the gap and the physical and visual separation of settlements or the distinctive nature of settlement characters.
- 4.3.2 Gladman consider that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. It is important that such designations are supported by robust evidence and that the policy wording allows for sites to be considered on their individual merits. In this regard, the policy is currently worded in a negative stance which may affect the consideration of development proposals. Gladman consider that the policy should be reconsidered in a positive manner and modified to allow for a balancing exercise to be undertaken which assesses any harm to the visual or functional

separation of settlements against the benefits of the proposal rather than seeking to apply a blanket restriction on development in these areas.

4.4 Strategic Policy H1: Housing Provision

Housing Need

- 4.4.1 Strategic Policy H1 makes provision for at least 8,389 net additional dwellings across the borough during the period 2021 – 2037. Whilst Gladman acknowledge that the housing requirement is set as a minimum, Policy H1 is not considered positively prepared as it does not provide a strategy which meets housing needs in full.
- 4.4.2 The level of housing required by the standard methodology as set in NPPF2019 requires provision for a minimum of 514dpa. It should be remembered that the housing need figure calculated using the Standard Method should be considered as a starting point as it does not take into account other factors which affect demographic behaviours (e.g. affordability, economic adjustments etc).
- 4.4.3 The Council has instead decided to use the Government's proposed housing methodology as announced in the Planning for the Future White Paper which allows LPAs to use either a percentage of the Borough's existing housing stock as the calculation's starting point or the most up-to-date household projections, whichever is the highest before an affordability uplift is applied. The Council has decided it is appropriate to plan for a scale of growth based on the proposed methodology which reduces the housing need figure to 403dpa.
- 4.4.4 The proposed approach is not appropriate nor justified as it will not deliver the minimum housing required by national policy using the standard method. The Council must remember that the implementation of the White Paper is still subject to the outcome of consultation and may be subject to change. In addition, it is not appropriate to delay the progress of the Local Plan until the measures announced within the White Paper come into force.
- 4.4.5 Accordingly, the Council should amend the housing requirement back to 514dpa and allocate sufficient sites across a number of locations to meet housing needs in full.

Phasing

- 4.4.6 Policy H1 outlines the Council's intention to phase the delivery of the housing requirement over the plan period. The housing requirement is phased as follows:
- Approximately 2,250 dwellings (450dpa) between 2021/22 and 2025/26

- Approximately 2,400 dwellings (480dpa) between 2026/27 and 2030/31
- Approximately 3,750 dwellings (625dpa) between 2031/32 and 2036/2037

4.4.7 The result of this element of the policy acts to artificially suppress the delivery of development in the early years of the plan due to strategic site issues given the majority of housing supply comprises of the Welborne Garden Village. Indeed, the Council has not achieved annual delivery figures in excess of 450 dwellings since 2007-08 so it is unclear how the Council expects to achieve these delivery rates especially towards the back end of the plan period without a sufficient supply and mix of housing sites.

4.4.8 The Framework is clear in its intention to boost significantly the supply of housing. This strategy is further underlined by the buffers applied by national policy and the PPG's approach that requires local authorities to meet housing shortfall within a five year period.

4.4.9 Gladman consider that the backloading of land supply will likely threaten the overall deliverability of the Plan. Should the Council fail to deliver these higher rates towards the end of the plan period, there is little flexibility or opportunity provided to ensure the housing requirement can be met in full. The phasing approach is therefore unsound and should be deleted and replaced with a flat annual requirement of 514dpa.

Buffer

4.4.10 In principle, Gladman support the inclusion of a 15% buffer to allow for contingency for under delivery associated with the reliance on large strategic sites within the housing supply. However, the buffer does not provide any sort of contingency due to the Council's decision to reduce housing requirement to 403dpa. In reality, it merely provides a level of housing comparable to the amount of housing needed to meet the annual requirement as identified under the Standard Method. Gladman reiterate that the housing requirement should be increased to 514dpa and a buffer applied to this figure.

4.4.11 Notwithstanding the above, Gladman would suggest that given the uncertainty surrounding both the delivery of strategic scale sites and the potential for unmet need within the wider sub-region, that this contingency should be increased to 20% above the Standard Method figure to ensure housing needs are met in full. This will also reflect HBF's advice following Central Government research on this issue.

Housing Provision

4.4.12 Strategic Policy H1 makes provision for at least 8,389 net dwellings across the borough during the period 2021 – 2037 and is comprised of:

- An estimated 552 homes that already have planning permission;
- An estimated 4,858 on sites with resolutions to grant permission as of 1st July 2020, including at Welborne Garden Village;
- Approximately 1,327 homes on sites allocated in the Publication Plan;
- Approximately 428 homes on brownfield sites/regeneration areas; and
- An estimated 1,224 homes delivered through windfall development.

4.4.13 To ensure the soundness of the Plan, Gladman submit that additional housing land is needed to ensure that the Council is able to demonstrate a robust supply of housing land should any of the sites within the Council's supply slip away. This is particularly important due to the reliance on sites with resolutions to grant planning permission and the vast majority of the Council's supply comprising of the Welborne Garden Village.

4.4.14 Whilst Gladman does not wish to comment on the suitability of sites selected, the Council will need to be able to demonstrate that sites will come forward as anticipated and take account of site specific issues and/or reflects the requirements and timescales of key infrastructure to be provided by sites selected. It is imperative that these assumptions are made in collaboration with landowners/land promoters to ensure these details are up-to-date at the point of submission. In this regard, it is difficult to assess the Council's consideration of sites as the Housing Trajectory at Appendix B only provides a cursory overview of expected delivery rates over the plan period and does not provide an individual break down of anticipated delivery rates on individual sites. As such, Gladman reserves the right to provide further detailed comments at the examination should further information be made available.

4.4.15 To ensure the effectiveness of the Plan in ensuring a supply of specific deliverable sites sufficient to maintain a five year housing requirement over the course of the plan period, additional allocations are considered necessary. Indeed, the planning committee has resolved to grant outline planning permission for Welborne Garden City in October 2019 to provide up to 6,000 dwellings over the plan period and beyond. There are a number of key factors that can affect the delivery of Garden Villages, Strategic Sites and smaller scale development opportunities such as the signing of s106 agreements, reserve matters applications and improvements to infrastructure prior to development commencing, discharge of planning conditions, marketing of development and so on, all of which can affect the delivery of homes. The Council will need to avoid a continued reliance associated with the Garden Village and large scale strategic allocations over the plan period and instead allocate additional housing land to ensure a competitive and responsive supply of housing is available to support housing delivery of the Council's large strategic allocations.

4.5 Policy HP1: New Residential Development

4.5.1 Policy HP1 states residential development within the urban area boundary will be supported in principle. Residential development in locations outside of the urban area boundary will only be permitted if it involves the conversion of an existing non-residential building or it is for a replacement dwelling which is of an appropriate character to the location.

4.5.2 Gladman do not consider the above policy to be positively prepared as it is restrictive and goes against the ethos of the Framework to significantly boost the supply of housing. The policy should be amended to be flexible in accordance with the approach outlined in section 4.2 of these representations.

4.6 Policy HP2: New Small-Scale Development Outside the Urban Areas

4.6.1 The above policy states new small-scale development outside the urban area boundary, as shown on the policies map, will be permitted where a site is located within or adjacent to existing areas of housing; or well related to settlement boundary and is within reasonable proximity to high frequency public transportation.

4.6.2 In principle, Gladman support the inclusion of this policy which allows for small scale development beyond the urban area. However, we would question the decision to limit development to no more than 4 units as this is contrary to the ethos of the Framework which seeks to significantly boost housing supply. Gladman consider such a policy should be included within the draft Local Plan without any limitations on size of development to ensure the Council are able to demonstrate a strong and robust housing land supply should sites identified slip away.

4.6.3 In addition, Gladman query how a decision maker is expected to apply this policy consistently and with ease as it contradicts the approach taken in Policy HP1 and reinforces the need for Policy HP1 to be deleted and the criteria listed to be amalgamated into Policy H2.

4.7 Policy HP4: Five-Year Housing Land Supply

4.7.1 Policy HP4 outlines the Council's approach to circumstances where it cannot demonstrate a five year housing land supply, a criteria then follows. In principle, Gladman support this approach but would suggest that the policy is modified to '~~may be~~ will be permitted where they meet the following criteria' as opposed to the current use of wording.

4.7.2 Criterion (a) of the proposed policy suggests that a site needs to be relative in scale to the demonstrated shortfall in the housing land supply. A proposal which comes forward which is

considered to be sustainable and in conformity with other policies of the Local Plan should be considered to be acceptable in planning terms regardless of whether it is relative to the scale and size of the housing land supply shortfall. Gladman consider that the reference to scale should be removed in order to allow for additional flexibility in the supply of housing as it will assist the Council in ensuring that a 5 year housing land supply can be maintained going forward.

- 4.7.3 In addition, Criterion (b) states that a site should be adjacent to the existing urban settlement boundaries to be considered sustainable. This criterion is too onerous as sites which are well related to, but not directly adjacent to existing settlements could, be considered to be sustainable when assessed against policies contained in the Local Plan as a whole. Again, Criterion (b) should be amended to reflect this.

4.8 Policy HP7: Adaptable and Accessible Dwellings

- 4.8.1 Policy HP7 requires at least 15% of all new dwellings to be built to optional building regulation M4(2) and on all schemes over 100 dwellings, at least 2% of private housing and 5% of affordable housing shall be provided as wheelchair accessible category M4(3) standard.

- 4.8.2 In this regard, Gladman refer to the PPG which provides additional guidance on the use of these optional standards. The Council need to ensure that this policy is in line with the guidance and that the justification and specific detail of the policy take account of the various factors which the PPG refers to:

“Based on their housing needs assessment and other available datasets it will be for the local planning authorities to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes).*
- *The accessibility and adaptability of existing stock.*
- *How needs vary across different tenures.*

- *The overall impact of viability.*⁴

4.8.3 Gladman note that these technical standards have deliberately been set as optional standards which, if to be included as a policy in the FLP, would need to be justified by robust evidence.

4.8.4 When considering this policy, the Council need to be aware of the impact that these requirements, particularly M4(3) have on scheme viability (due in part to size requirements) and the knock-on effects that this could have on the delivery of much needed housing. In order to be able to include such requirements in the Local Plan, the Council will need to be able to robustly justify the inclusion and demonstrate that consideration has been given to this requirement within the viability study. The provision of M4(3) wheelchair user dwellings, is far more onerous in terms of size requirements; therefore, it is crucial that the implications of the proposed policy requirement have been properly tested.

4.8.5 In addition to this, with regard to M4(3) Gladman refer to the PPG which states:

"Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

*Local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.*⁵

4.8.6 This clearly demonstrates that M4(3) should only be applied to affordable homes within the Council's control and therefore Policy HP7 should be updated to reflect this and reference to private homes deleted.

4.8.7 Gladman submit that the Council must be able to demonstrate through robust evidence the justification for these policy requirements within the Local Plan in order for them to be found sound at examination. The NPPF footnote 46 states:

"Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties..."

⁴ PPG ID: 56-007-20150327

⁵ PPG ID: 56-009-20150327

- 4.8.8 Gladman do not consider that a general reference to an ageing population to be sufficient justification for the inclusion of these policy requirements. In this regard, Gladman refer to the Inspector's report for the Derby Local Plan (December 2016), which at paragraph 117 states

"Although there is general evidence of an ageing population in the SHMA, having regard to the PPG this does not amount to the justification required for the LP to include the optional standards and the specific proportion of Part M4(2) dwellings..."

4.9 Policy HP9: Self and Custom Build Homes

- 4.9.1 Whilst Gladman support the inclusion of a policy in relation to self-build and custom build units, as this is in line with Government aims and objectives, we raise concerns regarding the detail within this policy.

- 4.9.2 It is expected that on sites of 40 dwellings or more (gross), 10% of the overall dwellings shall be provided through the provision of plots for self and custom build homes. Gladman welcome the flexibility provided by this policy which recognises that plots which do not sell within 12 months of initial promotion, are able to be developed for housing other than self-build homes.

- 4.9.3 However, Gladman query the evidential justification for 40 dwellings (gross) being the trigger for the provision of self-build and custom build housing. The Council's Self Build Register only identifies 180 residents which does not translate to demand for this form of housing. Gladman consider that this policy would benefit from re-wording to state that, rather than being required on all schemes of 40 or more dwellings, that if up-to-date evidence indicates that there is a demand in the particular location then schemes are encouraged to make provision. Such a modification would help ensure that market housing is not unnecessarily delayed for a period of 12 months if there is no interest in self-build housing on individual sites.

4.10 Policy NE2: Biodiversity Net Gain

- 4.10.1 Policy NE2 requires development of one more or more dwelling or new commercial/leisure buildings to provide at least 10% net gain for biodiversity for the lifetime of the development. Gladman do not consider this policy to be positively prepared as it goes above and beyond that which is required by the NPP2019. Gladman submit that the percentage requirement should be deleted and reference to 'biodiversity net gains' included in the policy wording to ensure compliance with national policy.

4.11 Policy D5: Internal Space Standards

4.11.1 Policy D5 requires all new dwellings, including subdivisions and conversions to meet the nationally described space standards (NDSS) or future equivalent as a minimum.

4.11.2 In this regard Gladman refer to the Written Ministerial Statement (WMS) dated 25th March 2015 which confirms that:

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG".

4.11.3 Furthermore with particular reference to the NDSS the PPG⁶ confirms:

"where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies".

4.11.4 If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the PPG, including need, viability and impact on affordability.

4.11.5 The Council will need to provide robust evidence to justify the inclusion of the space standards within a policy in the Local Plan. Similarly to the accessibility standards, if it had been the Government's intention that all properties were built to these standards then these standards would have been made mandatory rather than optional.

4.11.6 Gladman's concerns regarding the optional national space standards relates to the additional cost and the implications for affordability. Where, for example, a housebuilder would normally build a standard 2-bedroom unit at 72sqm, the national space standards would require the dwellings to have certain dimensions which would mean they could only be built at a minimum of 79sqm, which could add significantly to the cost of the property and in turn increase the cost of an entry level 2-bedroom house, further exacerbating the affordability issues in the area.

4.11.7 The Council need to take these factors into account and will need robust evidence on both need and viability to support the proposed policy requirements outlined in Policy D5.

⁶ ID: 56-020-20150327.

5 OVERALL CONCLUSIONS

5.1.1 These representations have been drafted with reference to the revised NPPF(2019) and the updated PPG. To be found sound at examination the FLP would need to meet the tests set out in paragraph 35 of the NPPF(2019):

- **“Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

5.1.2 Having considered the FLP in this context, Gladman are concerned that a number of policies contained within this plan do not accord with national policy and require modification to ensure soundness with the tests set out above.

5.1.3 Gladman believe that further flexibility and contingency is required through the FLP and that, consequently, additional non-strategic housing allocations should be included in the plan.

5.1.4 Gladman welcome this opportunity to comment on the publication draft plan and would like to be kept updated on progress moving forwards with the FLP. Gladman request to participate at the relevant hearing sessions through the examination of the FLP to discuss the matters raised in this submission further.

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:

MR

First Name:

John

Last Name:

Fleming

Job Title: (where relevant)

Policy Planner

Organisation: (where relevant)

Gladman

Address:

Gladman House, Alexandria Way, Congleton

Postcode:

CW12 1LB

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input checked="" type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input checked="" type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see attached representations.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Please see attached representation.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Respondent details:

Title:	Ms
First Name:	Lesley
Last Name:	Goddard
Job Title: (where relevant)	Teacher
Organisation: (where relevant)	[No Reply]
Address:	34 Osborne View Road
Postcode:	PO14 3JN
Telephone Number:	
Email Address:	

1) Paragraph: 9.11

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

I think this is too weak, and too open to interpretation " if it cannot be avoided" (which it always can by not doing the development) Should this not give examples of when "it cannot be avoided" and when "a last resort" comes into play? otherwise ordinary people without legal representation can't be able to make themselves heard against large developers with paid legal and PR PS this form asks me to judge whether a paragraph is legally compliant and complies with duty to cooperate - I wanted to leave this blank but I had only the choice of yes or no - but my real choice was "I'm not sure"

What modification(s) is necessary to make the Local Plan legally compliant or sound?

I don't think this is sound as the wording is too weak and doesn't give examples of what "cannot be avoided" and "as a last resort" mean. Therefore, it is an open invitation to saying "this can not be avoided"

How would the modification(s) you propose make the Local Plan legally compliant or sound?

see above

Your suggested revised wording of any policy or text:

see previous answer

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: NE2 - Biodiversity Net Gain

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

It should be readily visible to people where the 10% gain is - so display at both the development and the net gain - and where people can contact the developer. Then e.g. if the cycle and pedestrian space opposite Crofton school remains locked for over a year later, or many of the newly planted trees have died due to lack of care it is clear who to complain to and who to copy in to within the council

What modification(s) is necessary to make the Local Plan legally compliant or sound?

see below

How would the modification(s) you propose make the Local Plan legally compliant or sound?

see below

Your suggested revised wording of any policy or text:

At the development (and mitigation site if different) the developer should display details of the "10% gain" and contact details in case of a problem arising with use. Similarly suitable fines should be written within the contract - and money set aside in case of non-compliance

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Paragraph: 10.3

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

No indication of how these networks will come about - what mechanism will stop ever more private road users have a negative impact on us all when we are pedestrians, cyclists or public transport users

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Give examples of how this will come about

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Give examples of how this will come about

Your suggested revised wording of any policy or text:

Give examples of how this will come about

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Paragraph: 10.8

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

"reasonable choice" must include "reasonable expected duration"

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Duration of expected time to travel to key locations needs to be included by all modes of travel - a development need to show it will decrease time to take public transport/cycle/walk relative to car travel as currently needed in nearest neighbour. This would put the onus on developers to fund the modal shift improvements.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

see above

Your suggested revised wording of any policy or text:

see above

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

5) Paragraph: 10.1

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

exclude "road junctions" from the options available

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Elsewhere you say that "road junctions" is not enough - so exclude it from this section

How would the modification(s) you propose make the Local Plan legally compliant or sound?

see above

Your suggested revised wording of any policy or text:

Can we not say something stronger e.g. developments which don't allow car parking / encourage car share and cycle/walking are to be encouraged but those which make journeys by car the most likely outcome are not to be allowed?

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

6) Policy: CC1 - Climate Change

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

This is insufficient "supporting energy efficiency" rather than requiring energy efficiency is far too weak. No new development should be allowed which isn't carbon neutral.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

see below

How would the modification(s) you propose make the Local Plan legally compliant or sound?

see below

Your suggested revised wording of any policy or text:

remove "supporting energy efficiency" and replace with "requiring energy efficiency" - and state what this means in terms of heat loss

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I'm very disappointed at the lack of "teeth" of this policy - it sounds nice but it won't make any difference to what developers do. Passiv houses have been being built since the 1990's that's 30 years of design experience. Developers never introduce extra insulation through being asked nicely - but insist on it, and it becomes industry norm within months.

Respondent details:

Title:	Mr
First Name:	Steve
Last Name:	Godwin
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	7 Mariners Way, Warsash
Postcode:	SO31 9FN
Telephone Number:	
Email Address:	

1) Policy: NE1 - Protection of Nature Conservation, Biodiversity and the Local Ecological Network

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Inadequate compliance regarding position regarding excessive levels of Nitrates in the Solent area which has rightly prevented planning applications until resolved. The legal basis of the planned offset solution should be properly considered/challenged as the offset solution does not solve the problem. I have made representations to Sean Woodward and Stella Braverman in this regard. The response from my MP was inadequate and shows this as a political fudge.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Solve the nitrate problem

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Solve the nitrate problem

Your suggested revised wording of any policy or text:

Until the nitrate problem is resolved this policy should not be adopted or implemented.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Antony
Last Name:	Goodridge
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Housing numbers are flawed and out of date.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Needs reworking after govt announcements.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Does not matter what I say Sean Woodward will do his own thing anyway.

Your suggested revised wording of any policy or text:

Does not matter what I say Sean Woodward will do his own thing anyway.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Ms
First Name:	J
Last Name:	Goodwin
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 4.2

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

I disagree with the proposed allocation of houses at the SW of Sovereign Crescent in principle - However - it is impossible to tell if point 'e' is complete or is an unfinished sentence ?

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Re-issue and be clear

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Re-issue and be clear

Your suggested revised wording of any policy or text:

-

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

protectively marked material up to RESTRICTED and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this transmission in error please notify the sender immediately.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input checked="" type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

DS2: Development in the Strategic Gaps

B1c Which part of the Policies Map?

The Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough Council supports:

- the extent of the Strategic Gap as shown on the latest Policies Map which now includes the land east of Newgate Lane East
- that the land east of Newgate Lane East (formerly known as HA2) is no longer identified as a housing allocation in the FLP2037
- that the FLP2037 does not include the formerly identified Strategic Growth Area in the Fareham, Gosport, Lee-on-the-Solent and Stubbington Strategic Gap

Comments continued on next page

B3 Extension:

Gosport Borough Council had previously objected to major development proposals in the long-established Strategic Gap between the settlements of Fareham, Gosport, Lee-on-the-Solent and Stubbington including land east of Newgate Lane East (known as HA2) and the potential for a larger scale Strategic Growth Area.

Key reasons for objections included :

- The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;
- The proposals would negate the benefits being provided by the new improvements to Newgate Lane and the Stubbington Bypass with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
- The proposal would significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would potentially lead to a significant increase of traffic on residential roads;
- The proposal, as described, would be very car dependent with no provision for public transport. This would increase the amount of trips using Newgate Lane and exacerbate existing congestion and air quality issues;
- There is insufficient information on supporting infrastructure required including education, medical and community facilities;

The Council therefore strongly fully supports Fareham Borough Council's position on this matter in the Publication Draft (Regulation 19) version of the Fareham Local Plan.

It is however recognised that reverting to the original and current position of protecting the Strategic Gap will lead to a number of other objections from landowners and developers. Consequently to assist the Inspector with understanding Gosport Borough Council's position on the need to protect the Strategic Gap the Council has attached its three previous representations to the previous Regulation 18 consultations (listed below)(Appendix 1a, 1b and 1c respectively):

- The Consultation Draft Fareham Local Plan (DFLP) which was reported to the Regulatory Board on 6th December 2017
- The Fareham Borough Local Plan 2036: Issues and Options which was reported to the Regulatory Board on 25th July 2019
- The Fareham Borough Local Plan 2036: Supplement which was reported to the Regulatory Board on 28th February 2020

The objection to the third consultation (Feb 2020) covers all the Council's objections to the proposed development in the Strategic Gap. This includes the Council's original objection to the Newgate Lane allocation (HA2), which whilst was not subject to the third consultation the Council considered that it was necessary to append our comments in order that our concerns for the whole Strategic Gap could be read together.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

No modifications required for this particular matter

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?



Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Gosport Borough Council supports Fareham Borough Council's position. However the Council is prepared to attend any session regarding the future of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington if the Inspector considers it will assist the examination.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL



GOSPORT
Borough Council

Ms Claire Burnett
Head of Planning Strategy and Regeneration
Fareham Borough Council
Civic Offices,
Civic Way,
Fareham,
Hampshire.
PO16 7AZ

Please ask for:

Jayson Grygiel

Direct dial:



8th December 2017

By e-mail

Dear Ms Burnett

Draft Fareham Borough Local Plan 2036

Following Gosport Borough Council's consideration of the Draft Fareham Borough Local Plan 2036 (DFLP) at its Regulatory Board of 6th December 2017 the Council would like to make the following representations.

Summary of comments

- This Council considers that Fareham Borough Council (FBC) has not fully met its responsibility under the duty to cooperate as the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- That in the light of the requirements of the PUSH Spatial Position Statement and the Government's potential new standard methodology for calculating housing requirements, FBC consider whether there is the potential for any additional housing sites which are suitable, available and achievable (Policy H1 and Policy DA1).
- That FBC considers whether there is any potential to increase the affordable housing requirement from 30% (Policy H2).
- That this Council strongly objects to the proposed residential allocation at Newgate Lane for the reasons set out later in this submission (Policy HA2) and summarised below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Gosport/Fareham and Lee-on-the-Solent/Stubbington;
 - The proposal has the potential to negate the benefits being provided by the new improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the

local economy including accessibility to the Solent Enterprise Zone at Daedalus;

- The proposal has the potential to significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would potentially lead to a significant increase of traffic on residential roads;
 - The proposal, as described, is very car dependent with no provision for public transport. This would exacerbate the amount of trips using Newgate Lane;
 - Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and this may be difficult to mitigate given the scale of the allocation and limited public transport choice;
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities;
 - There is no provision in the policy to protect the amenities of existing residents in the vicinity.
- That this Council supports the additional employment allocation at Daedalus (Policy SP3) with further comments highlighted later in this submission.
 - That this Council supports the following policies:
 - Policy E5: Boatyards which aims to protect important marine sites for employment purposes;
 - Policy INF2: Sustainable Transport which aims to ensure the accessibility of existing highways networks are not harmed and provision is made for public transport and active travel;
 - Policy INF3: Road Network Improvements which safeguards the route of the Stubbington Bypass;
 - Policy D4: Coordination of Development and Piecemeal Proposals which aims to ensure a coordinated approach to development.

These matters and a number of other comments are further detailed in the following sections and are based on the Council's Regulatory Board Report and its subsequent resolution.

Duty to Cooperate

Local authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

The national Planning Practice Guidance (PPG) states that local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. This will help to identify and assess the implications of any strategic cross boundary

issues on which they need to work together and maximise the effectiveness of Local Plans.

This Council is particularly concerned regarding the impacts of the proposed residential allocation of Newgate Lane on residents and businesses of Gosport Borough (as detailed later in this submission). The Council considers that FBC have not had any meaningful engagement with Gosport Borough Council (nor Hampshire County Council, as the highway authority) on the proposed allocation, particularly regarding key cross boundary matters such as the designation of the Strategic Gap, and key infrastructure issues including transport, education and health.

With regard to the duty to cooperate the PPG states that planning for infrastructure is a critical element of strategic planning. The National Planning Policy Framework (NPPF) (paragraph 162) makes clear that local planning authorities should work with other local planning authorities and providers to assess the quality and capacity of a range of infrastructure types. This will ensure that key infrastructure such as transport, telecommunications, energy, water, health, social care and education, is properly planned. Planning for infrastructure is therefore a key requirement of the effectiveness element of the test of Local Plan soundness, which requires plans to be deliverable and based on effective joint working on cross boundary strategic priorities.

Housing requirements

The DFLP makes it clear that providing new homes to address housing need is a critical part of any Local Plan and a key requirement of the NPPF. Its development strategy aims to use previously developed land where available and greenfield land around the edges of existing urban areas in order to meet remaining housing needs but otherwise it states that it aims to strictly control development outside urban areas.

The DFLP makes provision for 11,300 dwellings over the period 2011-2036 (452 dwellings per annum). This figure has been informed by the PUSH Strategic Housing Market Assessment (SHMA Jan 2014) with an Objectively Assessed Housing Need (OAHN) Update published in April 2016. Subsequently the PUSH authorities considered the potential distribution of most of the housing requirement to 2034 and included this in the PUSH Spatial Position Statement (H1) (June 2016).

The various requirements of the OAHN, the PUSH Spatial Position Statement and the dwelling figures included in the DFLP are summarised in the table below:

Table 1: FLP Dwelling Target in comparison with OAHN and PUSH Spatial Position figure

	Timeframe	Borough total	Annualised
PUSH SHMA and Objectively Assessed Housing Needs (OAHN) (April 2016)	2011-2036 (25 yrs)	10,500	420
PUSH Spatial Position Statement	2011-2034 (23 yrs)	10,460	455 ¹
Fareham Local Plan 2036	2011-2036	11,300	455 (2011-2034) 420 (2034-2036)

It is therefore recognised that the DFLP meets the April 2016 OAHN requirements

¹ Rounded

over the period to 2036 by over 7%. It also noted that the sources of housing supply identified in Table 2 below, is currently higher than the DFLP requirement of 11,300.

Table 2: Sources of supply

Housing supply source	Number of dwellings
Housing completions (2011/12-2016/17)	1,859
Planning permissions	1,136
Windfall	1,320
Welborne (up to 2036)	3,840
Fareham Town Centre housing allocations	577
New Housing allocations	2,827
Total	11,559

It is important to recognise that the PUSH Planning Position Statement (paragraph 5.30) identifies that across the mainland PUSH area there is a shortfall of 6,300 dwellings (or 6.5%) to 2034 and when the Portsmouth housing market area (HMA) is considered separately there is a 4,180 dwellings shortfall (or 9%). Fareham Borough is located with the Portsmouth and Southampton HMA's and the inter-relationship between the two areas is recognised.

The PUSH Position Statement states that, *"Local authorities should actively seek opportunities to identify additional potential for housing provision to address the shortfall against the objectively assessed need through the local plan process" (H1)*. It adds that, *"any such potential opportunities will be tested against the principles of sustainable development set out in the National Planning Policy Framework and this Position Statement."*

The proposed dwelling figure in the DFLP in effect reduces the overall shortfall of the PUSH mainland requirement by 800 dwellings². A significant question is whether there is sufficient capacity in the remaining parts of the Portsmouth HMA (Gosport, Havant, Portsmouth, Winchester (part) and East Hampshire (part)) to meet the remainder of this shortfall; if this cannot be demonstrated and if Fareham are unable to adequately justify why sites have or have not been allocated the Fareham Plan may be deemed to be unsound.

It is also important to recognise that the Government has recently consulted on a standard methodology to calculate housing need in a document entitled '*Planning for the right homes in the right places*'. Plans submitted to the Secretary of State after 31st March 2018 will need to use the new standard methodology. FBC are proposing to submit their plan in Autumn 2018. The latest calculated need figure included with the Government's consultation document highlights a figure of 531 per annum for Fareham Borough compared to the current figure for Fareham (420 per annum). This would result in an allocation requirement of 13,275 dwellings as opposed to 11,300 dwellings during a 25 year period.

The new methodology also requires a '*Statement of Common Ground*' to be produced between neighbouring local planning authorities which would form part of the statutory duty to cooperate. On this basis the PUSH authorities need to continue

² Based on the following calculation

The OAHN figure for Fareham Borough between 2011-2036 is **10,500** (Table 1 of the PUSH Spatial Position Statement)

The DFLP proposes **11,300** dwellings. 11,300- 10,500=**800**

to work collaboratively to meet the housing market shortfall and FBC needs to be satisfied (and be able to satisfy the Inspector) that it has explored all other opportunities which are suitable, available and achievable, and can be tested favourably against the relevant sustainability principles set out in the NPPF.

Affordable Housing

Policy H2 of the DFLP relates to affordable housing which requires that on sites of 11 or more (or residential proposals with a total floorspace exceeding 1,000m²) proposals shall provide 30% of dwellings as affordable housing or 20% within the Fareham town centre boundary. This is based on a viability assessment. This would include the requirement that 10% of the overall dwellings on site would be an affordable home ownership product.

The Gosport Borough Local Plan 2011-2029 (GBLP) requires 40% affordable housing on sites of 10 or more. The affordability of dwellings in Fareham Borough is an issue. For example, the ratio of median house price to median gross annual workplace earnings is 9.22 in Fareham compared to 7.01 in Gosport. In the light of this and the fact that Gosport Borough has been able to achieve 40% affordable housing on numerous sites, FBC may wish to consider seeking a higher proportion of affordable housing. This may require re-examination of the assumptions made as part of their housing viability work. If there are viability issues these can be addressed as part of the provisions of the policy which outlines an open book approach with a third party assessment of development viability.

Newgate Lane Housing Allocation

In order to meet its housing requirement the DFLP identifies a number of housing allocations across the Plan area. Of particular relevance to Gosport Borough is the allocation of land at Newgate Lane for between 370 and 475 dwellings (Policy HA2).

It is acknowledged that FBC needs to find sufficient land to meet its housing requirements and that dwellings at this site would also assist in meeting the needs of people living in Gosport. However, there are a number of significant issues raised by this allocation, which are outlined below, and which it will be necessary for FBC to fully consider.

Strategic Gap

In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between '*Fareham/Bridgemark and Stubbington/Lee-on-the-Solent*', which is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.

The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.

FBC's current Policy CS22 states that '*development proposals will not be permitted*

either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements’. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.

The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

It is considered that this remains relevant in the case of the Newgate Lane area. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC’s evidence regarding the review of Strategic Gaps and states,

‘although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council’s approach is sound.’

The latest DFLP also includes a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identifies a Strategic Gap between *‘Fareham/Bridgemark and Stubbington/Lee-on-the-Solent’*. It states, *‘development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements’*. The justification text acknowledges that, *‘retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation’*. It also clearly states in Paragraph 4.39 that, *‘further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.’* This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.

The proposed removal of this land from the Strategic Gap also appears to be at odds with FBC’s own supporting evidence. The Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the ‘Woodcot area’ which includes the land covered by the proposed Newgate Lane allocation. It concludes,

‘This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.’

Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area should remain an integral part of the Strategic Gap.

Whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.

Transport and accessibility

The Council also objects to the proposed allocation due to the potential negative impacts on the new Newgate Lane route. The new route was designed to achieve the following:

- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
- increasing capacity and easing existing congestion on the route;
- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

These objectives would be undermined by the proposed development. It was not intended that the improvements would facilitate new housing development.

The DFLP is accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 3 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience '*more noticeable increases in traffic flow.*'

Table 3: Road capacity on Newgate Lane

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan Review

At the present time this allocation has not been assessed by the Local Highway Authority to determine the implications on the highway capacity of Newgate Lane and no modelling work has been assessed to consider the trip generation from this level

of development, either in terms of numbers of additional vehicles or their likely distribution on the highway network or highway safety. Therefore the Council has no option but to object to the proposed allocation in the DFLP on this issue at this stage. Gosport Borough Council is very concerned that the proposed allocation will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

The north-south movements along Newgate Lane should not be hindered by any proposed new access arrangements for the proposed allocation and the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'*

Due to the lack of detailed available information it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.

Given that the proposed allocation may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether this site together with other potential residential developments on the south side of Fareham could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. It is important to note that the DFLP states in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes. FBC is therefore not being consistent in its policy approach between the Stubbington Bypass and the Newgate Lane improvements.

The Newgate Lane allocation policy (HA2) includes a criterion that makes provision for off-site highway improvements and mitigation works, however, this Council requires further details of such measures, and questions whether the principle of any proposal at this site would be able to satisfactorily mitigate these impacts.

The Council is also concerned that the proposed allocation would not meet the requirements of the DFLP sustainable transport policy (Policy INF2). Amongst other things, this policy aims to ensure that development:

- does not demonstrate a severe cumulative impact (causing demonstrable harm) on the operation, safety or accessibility to the local or strategic highway networks; and
- mitigates impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development on the network, through provision of improvements or enhancements to the existing network to accommodate additional traffic; or contributions towards necessary or relevant transport improvements.

In the light of the above policy it is considered that the proposed allocation may not be able to provide any meaningful improvements to satisfy these requirements given the current and ongoing access issues to and from the Gosport Peninsula.

The DFLP originally proposed two other vehicular accesses (in addition to Newgate Lane) which link the potential new allocation to the existing residential communities in Gosport. This includes Brookers Lane as a secondary access for a limited number of dwellings.

The other proposed access off Tukes Avenue has now been withdrawn following a recently issued addendum by FBC which reads, *'The site promoter has advised Fareham Borough Council that the potential access identified via the demolition of two houses on Tukes Avenue (165 and 167) is a factual error. The site promoter has confirmed that potential vehicle access via these properties is not being pursued'*

Notwithstanding that the residents of these and adjacent properties were most unfortunately not previously notified of these proposals, it is not clear from this statement whether the site promoter will be seeking an alternative access on the eastern boundary. It is considered that any such access points from housing areas within Gosport, will add to traffic on the local highway network within Gosport, which again has not yet been quantified in terms of number/distribution and junction/link capacity. The nature and scale of these access points will have a direct impact on their use/attractiveness, particularly if through routes are created. The creation of such accesses may create rat-runs through the existing residential areas within Gosport, due to perceived journey time savings compared with joining Rowner Road/Peel Common Roundabout. This could be exacerbated with the development of the Stubbington Bypass.

Despite the addendum significant concerns remain regarding any proposed access onto Tukes Avenue. These include:

- The amenities of neighbouring residents as an access road will serve a considerable number of dwellings;
- The capacity of Tukes Avenue and adjoining roads to take the additional traffic; and
- The proximity to facilities such as Woodcot Primary School and the impact on pedestrian safety.

There is no mention of improving public transport with regard to the proposed allocation. This needs further consideration to reduce the site's car dependency which would add further pressure on Newgate Lane. This will also have a detrimental impact on the existing Air Quality Management Areas within Fareham. It will be necessary to explore strategic transport options such as the potential for a new bus rapid transit link which could connect Lee-on-the-Solent, Daedalus, Newgate Lane, and the Busway through to Fareham.

Cycle and pedestrian links to the adjacent Bridgemark and Peel Common are identified in Policy HA2.

Residential amenities and design

Any development of this scale on greenfield land will create significant concerns from existing residents particularly in areas immediately adjoining the site. It will be critical that their amenities are not harmed by any future proposals on this site and this

should be reflected in Policy HA2.

School provision

Provision is included in the policy to ensure improvements to local schools and early-years childcare (as identified by the Local Education Authority). However, there is insufficient detail of how local school places could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on this site is likely to include a high proportion of households with children.

Community facilities

It will also be important to understand whether any new development at Newgate Lane can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.

Policy CF1 of the DFLP recognises the need for community facilities as part of large residential developments and that these should be delivered to prescribed timescales to meet the needs of the community. The DFLP specifically mentions Bridgemary School as the primary location for community facilities (sport pitches, courts, hall and stage, and various meeting and conference rooms for hire). It states that these facilities are generally less than 1km from within the allocation and that it is not considered necessary for additional space to be provided with the allocation.

Policy LP32 of the GBLP requires the consideration of community facilities for new residential developments (normally for sites of 100 dwellings or more). It is therefore considered appropriate for FBC to further assess the community requirements of a development of this scale and include such provision within Policy HA2.

Open space

The proposals as set out in Policy HA2 include a number of open space requirements including:

- Neighbourhood Equipped Area of Play (NEAP) and a Multi-Use Games Area for older children on-site;
- Improvements to existing off-site sports facilities at Brookers Field and Tukes Avenue which are GBC-owned facilities.
- The potential to take a financial contribution to improve sports pitch provision and associated facilities at Tukes Avenue Open Space and/or Brookers Field Recreation Ground.

It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

Air quality

Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 specifically to mitigate this impact for this development allocation. This may be difficult for a development of this scale with limited public transport choice. The issue of air quality is highlighted in the Interim Traffic Assessment which notes that in January 2017, Fareham and Gosport Environmental Health Partnership issued the Annual Status Report 2016, which concluded that both the existing AQMAs need to

be extended as locations outside of the AQMAs had exceeded the annual mean NO₂ objective for Fareham. The AQMA extensions were agreed in October 2017.

Drainage

The area includes a number of drainage ditches which are part of the River Alver catchment. The development allocation proposes to retain and enhance these drainage ditches as part of a Sustainable Drainage System (SuDS). It will be important to understand the impact of any development on potential for surface water flooding in the vicinity and the water quality of the River Alver.

Natural environment

It is recognised that the proposal aims to retain existing field and tree boundaries and to incorporate street trees and verges to reflect the character of Bridgemary.

Employment policies

Employment floorspace requirements

The Draft Plan is proposing 130,000m² of new employment floorspace for the whole of Fareham Borough (Policy E1) which is based on the figure included in the PUSH Spatial Position Statement with the additional two years included on a pro-rata basis (and then rounded to nearest '000 m²).

Daedalus

Of particular interest to Gosport Borough is the proposed extension to the employment allocation at Daedalus (Policy SP3) which will result in an additional 48,000 m² of employment floorspace with a total of 98,000m² of light industrial, general industrial and warehousing floorspace (B1c, B2 and B8 uses) with ancillary office accommodation (B1a) plus 4,000sq.m of retained floorspace. This extended area includes the 2nd runway on the Daedalus East part of the site.

The Policy makes provision for:

- an employment hub that contributes positively to the creation of aviation, non-aviation and skills/innovation employment clusters;
- ancillary service infrastructure and facilities to support the Solent Airport, and Faraday and Swordfish Business Parks;
- broad aviation uses which support the long term sustainability of the airfield;
- strategically important energy and communications infrastructure;
- skilled jobs that take advantage of and develop local skills; and
- accessible public open space and enhancements to the strategic green infrastructure network.

In principle, this additional area allocated for employment is strongly supported as it will bring additional jobs and investment to the Peninsula which will be accessible to Gosport residents and reduce out-commuting on the A32.

However, it is important to raise a number of concerns with FBC which are set out below.

- No mention is made of the Daedalus Waterfront area and the cross boundary issues. The Council consider that the policy and justification text needs to recognise the full context of the site and that part of the Daedalus site is within Gosport Borough. It is important to recognise the opportunities of the Waterfront and how these contribute to the success of the whole site. It will

also be important to consider issues across the boundary including those relating to the provision of infrastructure in order not to prejudice delivery of the Waterfront.

- It is important that the proposed additional employment allocation set out in Policy SP3, which is over and above that set out in the original Outline Planning Permission, is subject to additional evidence with regard to issues such as transport movements. This is necessary in order not to prejudice development on those parts of the site that already have Outline permission. These areas may come forward at a later date than the proposed allocation due to issues relating to contamination and the presence of important heritage assets that may affect the overall viability and speed of delivery.

The Strategic Gap covering Daedalus including the Airport and the extended employment allocation will remain in order to prevent coalescence of the Stubbington/Lee-on-the Solent with Fareham/Gosport. It is proposed that the additional development at Daedalus will be perceived as an 'isolated' campus style commercial development within the airfield site which has a separate identity rather than an extension of the surrounding urban area. There needs to be a specific criterion in Policy SP3 regarding this issue to ensure that the appearance and function of the Strategic Gap is sufficiently protected with more detailed guidance as part of the justification text.

Marine economy

The other main employment policy of particular relevance to the Gosport economy is Policy E5 which relates to boatyards. This policy aims to protect marine-related employment uses. This policy is supported as the availability of waterfront sites around the Solent is limited and the marine businesses they support contribute to one of the key sectors of the sub-regional economy.

Transport

The DFLP safeguards the land required for the Stubbington Bypass and associated junctions (Policy INF3). It recognises that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text acknowledges this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It states that the bypass is not being provided with an intention of serving or facilitating additional new homes. The safeguarding of the Stubbington Bypass route is supported.

There also appears to be a proposed improvement on the DFLP Policies Map at the Delme Roundabout (A27) but this is not mentioned in the Plan itself. Therefore clarification is sought on this proposal.

The DFLP also aims to encourage sustainable and active travel modes (Policy INF2) which is supported. This issue has become particularly important for FBC due to the requirements associated with the Air Quality Management Areas (AQMAs) associated with the northern end of Newgate Lane and Gosport Road, and Portland Street.

Consequently development will be required to support the use of alternative vehicle types and fuels such as the installation of Electric Vehicle charging equipment in residential properties and communal parking area.

Other policies

Retail

The Fareham Local Plan does not allocate any addition retail floorspace as it acknowledges that its Town Centre has seen a significant increase in vacant retail floorspace from 5,345 m² to 10,234m² between 2016 and 2017 (representing an increased vacancy rate from 6% to 11%). Its evidence suggests there will be a requirement beyond 2026 but it has been decided to consider this when the Plan is next reviewed, recognising that the Government is proposing a requirement to review Local Plans every five years.³

Proposals relating to out-of-town shopping areas such as Speedfields Park (Newgate Lane) will be subject to Policy R4 which requires an impact assessment in accordance with the NPPF for proposals of 500sq.m or over (both new units or extensions) in order to demonstrate that there is no significant adverse effect on the vitality and viability of existing or proposed centres. This approach is supported.

Community Facilities and Open Space

It is noted that the Plan includes a number of policies relating to community facilities and open space which seek to retain and improve existing facilities.

Natural Environment

The Plan includes a series of policies relating to biodiversity including commitment to the Solent Recreation Mitigation Partnership, of which GBC is also a partner. It also includes provision relating to coastal flood risk management including the provisions of the River Hamble to Portchester Coastal Strategy prepared by the East Solent Coastal Partnership.

Design

The Plan includes a number of design and heritage policies which aim to protect the local distinctiveness of the landscape and built environment, and create a sense of place.

Policy D4 aims to coordinate development and states where proposals come forward that are part of a wider development site, supporting information will be expected to demonstrate that the proposal will not prejudice the development of the adjoining site and that the proposal maximises place-making opportunities. It adds that development proposals will not be permitted that: prevent or limit the potential for developing an adjoining site; or which do not maximise connectivity and permeability opportunities; or address mitigation needs relating to the wider development potential.

The aims of Policy D4 are supported and may be applicable with regard to the development of sites such as Daedalus.

³ As proposed in the Government's Housing White Paper - Fixing our broken housing market (Feb 2017)

Concluding remarks

In the light of the above comments it would be useful if we could meet with you to discuss these issues further. In the meantime if you require any clarification on these matters please do not hesitate to contact me or Jayson Grygiel, the Deputy Head of Planning Services (Policy) for further assistance.

Yours sincerely

Debbie Gore
Head of Planning Services



GOSPORT
Borough Council

Ms Claire Burnett
Head of Planning Strategy and Regeneration
Fareham Borough Council
Civic Offices,
Civic Way,
Fareham,
Hampshire.
PO16 7AZ

By e-mail

Please ask for:

Jayson Grygiel

Direct dial:



25th July 2019

Dear Claire

Fareham Borough Local Plan 2036: Issues and Options

Thank you for consulting Gosport Borough Council (GBC) on the Issues and Options document for the Fareham Borough Local Plan 2036. I can advise that the document was considered at the Council's Regulatory Board of 23rd July 2019.

A summary of our representations, based on the Board's resolution, is set out below with more detailed comments attached (Appendix 1). These additional comments also form part of the Council's representations.

- Gosport Borough Council strongly opposes significant housing development in the current Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington as it does not represent 'good growth' and that it merits continued protection from any future development. The reasons for the objection, set out in Appendix 1, are summarised as follows:
 - There is an imperative requirement to safeguard effective strategic transport routes through the Strategic Gap to improve accessibility to, and from, the Gosport Peninsula to support the local economy. Further allocations will individually and cumulatively exacerbate accessibility constraints for reasons detailed in Appendix 1.
 - Further allocations will lead to the extensive erosion of the Strategic Gap, which is a long established planning principle in the South Hampshire area, as identified by the Partnership for South Hampshire's Spatial Position Statement that aims to prevent coalescence of settlements, maintain a sense of place and settlement identity, and provide a countryside setting for the sub region and local communities.

- More specifically this Council maintains its objection in full to the proposed residential allocation at Newgate Lane (referred to in the previous Draft Fareham Local Plan (DFLP) (2017) as HA2) for the reasons set out below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;
 - The proposal would negate the benefits provided by the recent improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
 - The proposal would significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would lead to a significant increase of traffic on residential roads;
 - The proposal, as previously described in the DFLP is very car dependent with no provision for public transport. This would exacerbate the number of trips using Newgate Lane
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities;
- Both Councils should proceed to publish the bilateral Statement of Common Ground as practicably as possible identifying major areas of agreement and non-agreement.
- Both Councils should consider producing an agreed strategy for the strategic gap as part of our Statement of Common Ground work which can be included in the respective Local Plans. This strategy should aim to provide multi-functional benefits to local communities as set out in detail within Appendix 1.
- FBC should consider opportunities to increase residential densities at the proposed Welborne development to reduce the need to develop in the Strategic Gap. It should also consider increasing densities in sustainable locations within Fareham Borough including within, and adjacent to, centres, and in close proximity to railway stations.

In the light of the above comments it will be important to maintain our ongoing dialogue as part of our bilateral Statement of Common Ground work as well as our continued involvement as part of the multilateral PUSH initiatives. In the meantime if you require any clarification on these matters please do not hesitate to contact me.

Yours sincerely



Jayson Grygiel
Manager of Planning Policy

Appendix 1: Gosport Borough Council's detailed representations to the Fareham Local Plan: Issues and Options Consultation- July 2019

The detailed comments summarised in the attached letter are detailed below.

1.0 Land in the Fareham, Gosport, Lee-on-the-Solent, Stubbington Strategic Gap including the HA2 allocation

1.1 Firstly it is recognised that the standardised methodology introduced by the National Planning Policy Framework has increased the required number of dwellings that Fareham Borough Council need to consider over the Plan period to 2036 and hence the need to assess additional sites for residential allocations. However Gosport Borough Council strongly opposes new residential development in the Fareham-Gosport- Lee-on-the Solent and Stubbington (FGLS) Strategic Gap for a number of reasons set out below.

1.2 The Issues and Options document recognises that, '*previous planning policies have designated the whole area as a strategic gap in order to prevent Fareham and Stubbington from merging and help to define distinctive communities,*' and that, '*given the additional housing requirement, the Council is having to look again at the purpose of this existing strategic gap and its characteristics.*'

1.3 The Issues and Option Consultation also continues to identify the land between the Newgate Lane improvements and the Borough boundary at Bridgemary and Peel Common as a housing allocation (previously referred to as HA2).

1.4 As this site remains identified as an allocation and there has been no additional evidence to address any of the Council's substantial concerns it is proposed that the Council reiterates the comments made previously on this matter. Similarly as many of the Council's objections to HA2 are relevant to other potential allocations in the Fareham, Gosport, Lee-on-the-Solent and Stubbington (FGLS) Strategic Gap, it is proposed to set out our representations relating to HA2 and any potential additional allocations as a number of themes:

- Transport and Accessibility
- Air quality
- The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements.
- Protecting the Strategic Gap to deliver multi-functional benefits for local communities
- Community and open space infrastructure

Transport and accessibility

1.5 **Why is a strategic transport corridor so important?** One of the Council's

primary concerns is the impact of potential new development, including HA2 and any additional allocations, will have on the effectiveness of the strategic transport corridor through the existing Strategic Gap. It is considered that any allocations which have access directly onto the recently improved Newgate Lane and the proposed Stubbington Bypass will negate the benefits these proposals will deliver to improve accessibility to, and from, the Peninsula.

- 1.6 These improvements are aimed at addressing existing acute transport infrastructure deficiencies, not to enable development on greenfield sites directly adjacent to the routes. Instead this improved infrastructure can bring regeneration benefits to difficult brownfield sites in Gosport and make them more attractive to investors. The NPPF is very clear that policies should promote the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.
- 1.7 The issue of maintaining an effective transport corridor is imperative for Gosport's future prosperity. The Stubbington Bypass route is the only opportunity to improve vehicular access to the Borough. If the benefits of the Stubbington Bypass are negated by significant development being built with access directly onto the Bypass, this last opportunity would be lost and there would be a real sense that Gosport has been 'blocked in'.
- 1.8 This would perhaps be less significant if Gosport had its own railway station and had a reasonable job density rate with limited out-commuting. However this is certainly not the case.
- 1.9 Gosport has the lowest job density in the South East of England and one of the lowest in England at only 0.51 jobs per resident person of working age. Such a low job density has significant implications for the Borough including the considerable scale of daily out-commuting which puts tremendous pressure on the existing road system resulting in acute traffic congestion and high levels of air pollution as evidenced in the air quality management areas identified within Fareham Borough at the north end of the Peninsula. This congestion results in the road network reaching full capacity and an extended peak time spreading on key routes. This actual congestion as well as the wider perception of congestion that exists can act as a disincentive for business and employment investment. Gosport has limited transport options with no fixed rail link and hence the effectiveness of the small number of road routes from Gosport is even more important.
- 1.10 **Specific accessibility issues relating to HA2 and other allocations having direct access onto Newgate Lane East:** The Council would wish to maintain its objection to the HA2 proposal which included access directly onto Newgate Lane East. The Council's specific concerns regarding HA2 are also likely to be applicable to any further allocations in this area.
- 1.11 It is important to recognise that Newgate Lane East and other associated improvements were designed to achieve the following:
 - improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
 - increasing capacity and easing existing congestion on the route;

- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

1.12 These objectives would be undermined by the proposed development at HA2 and other similar allocations. It was not intended that the strategic highways improvements would facilitate new housing development. Gosport Borough Council is very concerned that the HA2 proposed allocation and additional ones will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

1.13 The earlier Draft Fareham Local Plan (2017) (DFLP) was accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognised that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 1 summarises information from this document which highlighted that this situation is predicted to worsen over the period to 2036 and consequently the report recognised that Newgate Lane will experience *'more noticeable increases in traffic flow.'*

Table 1: Road capacity on Newgate Lane

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan 2036

1.14 Additional allocations in the Strategic Gap would exacerbate the situation still further. It will also be necessary to take into account the additional allocations being put forward as part of the emerging work for the Gosport Borough Local Plan 2036.

1.15 The north-south movements along Newgate Lane should not be hindered by any new access arrangements for any proposed allocation, and consequently the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal for the previous DFLP concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve*

accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'

- 1.16 Due to the lack of detailed information available at the Issues and Options stage it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.
- 1.17 **Potential impact on the effectiveness of the Stubbington Bypass:** Given that proposed allocations may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether the HA2 site together with other potential residential allocations could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. .
- 1.18 The DFLP recognised that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text in the DFLP acknowledged this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It is important to note that the DFLP stated in paragraph 11.46 that the Stubbington Bypass is **not** being provided with an intention of serving or facilitating additional new homes. GBC consider that FBC's position in the DFLP relating to the Stubbington Bypass is still valid and should be maintained.

Air quality

- 1.19 Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 of the DFLP which promotes sustainable transport to mitigate this impact. This is likely to be very difficult for allocations in the Strategic Gap of this scale with limited public transport choice.

The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements

- 1.20 The Strategic Gap is identified in the Gosport Borough Local Plan 2011-2029 (GBLP) (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.

- 1.21 In order to accommodate the HA2 residential allocation the DFLP proposed to amend the Strategic Gap and this would be the likely consequence of any further proposed allocations within this broad area.
- 1.22 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- 1.23 FBC's current Policy CS22 states that '*development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements*'. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.
- 1.24 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.
- 1.25 The Issues and Options consultation appears to encourage a move from this position by suggesting that development in the Gap could be appropriate through 'careful planning'. This Council strongly opposes this change in approach and considers that the HA2 allocation and additional residential proposals will have a significant and detrimental impact on the current form and function of the Strategic Gap and no amount of 'careful planning' would be able to mitigate these impacts.
- 1.26 It is considered the text of Policy CS22 remains relevant in the specific case of the Newgate Lane area and much of the remainder of the strategic gap. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,
- 'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'*
- 1.27 The DFLP (2017) also included a policy relating to Strategic Gaps (Policy

SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identified a Strategic Gap between 'Fareham/Bridgemarky and Stubbington/Lee-on-the-Solent'. It stated, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements'*. The justification text acknowledged that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly stated in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemarky along with maintaining the separate identify of Peel Common.'* This Council agrees that this approach should be maintained.

- 1.28 Allocations in the Strategic Gap would also contradict FBC's own evidence which seeks to protect the strategic gap. By way of an example, the Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the 'Woodcot area' which includes the land covered by the proposed HA2 Newgate Lane allocation. It concludes, *'This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'*
- 1.29 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area and other parts of this area should remain an integral part of the Strategic Gap.
- 1.30 Whilst recognising that circumstances have changed in terms of the need to accommodate additional housing numbers it is considered that there is an even stronger imperative to protect these important strips of land between settlements in the form of the Strategic Gap which certainly continue to perform the long-established planning function that both Councils have worked together to protect.
- 1.31 It is also recognised that the local plan process is the appropriate time to review such designations; however it is considered that the proposed change at the HA2 allocation and other potential changes will affect the integrity of the remaining gap by significantly reducing its width. This and other proposed residential allocations by their sheer scale will undoubtedly harm the character of the gap and will diminish the physical and visual separation of the settlements.

Protecting the Strategic Gap to deliver multi-functional benefits for local communities

- 1.32 This Council proposes that we work together with FBC bilaterally and as part of PUSH to find a long-term strategy for the strategic gaps which serve a number of existing functions and could be further diversified. These functions include:

- Strategic transport corridor for critical road infrastructure to, and from the Peninsula including the recent Newgate Lane improvements and proposed Stubbington Bypass.
- The Daedalus employment areas which have been designed to reflect the character of this part of the Gap
- Utilities including the Peel Common Waste Water Treatment Works
- Sustainable power - Solar farms and IFA2
- Recreational land to improve cycle and walking routes to facilitate countryside access between the communities and links with Titchfield and the Meon Valley.
- Land for environmental mitigation
 - Land required for nitrate mitigation
 - Land required to deflect recreational pressure from sensitive coastal habitats and/or create Brent Goose refuges to allow development to take place in more sustainable locations
 - Land required for biodiversity net gain
 - Land required for carbon storage
- Maintaining local food production

1.33 Therefore as part of this Issues and Options consultation this Council would request that FBC considers the option of establishing a multi-functional corridor which includes the various uses set out above. It is considered appropriate that the agreed joint long term strategy would include the whole strategic gap including areas within Gosport Borough to ensure that recreational and environmental benefits are taken together.

1.34 It is noted from the Issues and Options consultation that FBC are asking respondents whether there are any local areas of green space that the Council should protect. This relates to the NPPF's Local Green Space designation which states that this designation should only be used if it is:

- In reasonably close proximity to the community it serves;
- Demonstrably special to the local community and holds a particular significance for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness in wildlife;
- Local in character and is not an extensive tract of land.

1.35 The NPPF adds that policies for managing development within a Local Green Space should be consistent with those for green belts. It is not clear what is meant by 'extensive' as this is a relative term and when compared to tracts of open countryside, the Strategic Gap is local and not particularly extensive. FBC may wish to explore opportunities to allocate areas of the

Gap as Local Green Space if it considers these meet the relevant criteria.

- 1.36 The Issues and Options consultation also states that it is proposed that the Meon Valley is included as part of the PUSH work to consider the potential for greenbelt land across the local authority area, as it recognises that there could be scope for this area to become part of a South Hampshire greenbelt. As part of any consideration of green belt it would also be necessary to consider the option of the FGLS Strategic Gap as well.
- 1.37 According to the NPPF greenbelts need to serve five purposes:
- To check the unrestricted sprawl of large built-up area
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside for encroachment
 - To preserve the setting and special character of historic towns;
 - To assist urban regeneration by encouraging the recycling of derelict land and other urban land.
- 1.38 In this instance a greenbelt in the FGLS Strategic Gap would prevent the Portsmouth-Fareham- Gosport conurbation merging with Lee-on-the Solent and Stubbington. The fifth reason outlined above is particularly applicable for Gosport's issues relating to brownfield sites.
- 1.39 It is important to recognise that there are substantial hurdles in establishing a new greenbelt and the NPPF states that these should only be established in 'exceptional circumstances' and that there are five very difficult criteria to meet. It is mentioned in this context as if the Meon Gap is being considered then it is reasonable that the FGLS Strategic Gap should be included as part of this process.
- 1.40 Overall it is considered that a joint Fareham/Gosport strategy for the Gap with PUSH support would be a significantly positive way forward which would deliver multi-functional benefits for local communities in both Boroughs. This could form part of our bilateral Statement of Common Ground and be included in the respective Local Plans.

Community and open space infrastructure

- 1.41 The Issues and Options consultation does not include detail on the facilities and services supporting potential allocations within each of the broad areas. Therefore it is considered necessary for the Council to maintain its earlier concerns raised as part of the DFLP consultation with regard to educational, community and open space facilities in relation to the HA2 allocation and acknowledge that depending on what is proposed at the next consultation Local Plan there may well be further concerns relating to these matters.
- 1.42 Issues raised previously included:

School provision- there is insufficient detail of how local school places

could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on the HA2 or other unidentified allocations are likely to include a high proportion of households with children.

Community facilities- It will also be important to understand whether any new development at Newgate Lane or other allocations can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.

Open space- It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

Conclusion to Fareham, Gosport, Lee-on-the-Solent, Stubbington section of the Issues and Options Consultation

- 1.43 In the light of the above and in answer to the question posed in the Issues and Options consultation it is considered that development in the strategic gap including the HA2 consultation does not represent good growth for the residents and businesses of the Gosport peninsula. The Council does not support future growth in the Strategic Gap and instead considers that it merits continued protection from any future development.
- 2.0 **Housing density at Welborne**
- 2.1 The Issues and Options Report focusses on eight broad areas for the potential for finding land for new houses. In addition to the '*Land between Fareham and Stubbington*', FBC may wish to consider further options at Welborne.
- 2.2 The document itself only includes '*Land around Welborne Garden Village*' and not Welborne itself. This broad area of search is the area of land to the east of the A32 north of Junction 10 and close to Junction 11. The document states that '*with the exception of land close to junction 11 being promoted for commercial use; the Council has not received details of any land being promoted in this area, all of which is in private ownership. Additionally this area is considered to be valued landscape with limited scope to accommodate large-scale development.*' In the light of the above statement there may be difficulties for additional development in this area.
- 2.3 However there may be opportunities to increase the residential quantum at Welborne itself by increasing densities. It is recognised that there may be constraints to reviewing these options at this stage, particularly given that there is a planning application for the site currently under consideration
- 2.4 However even marginal density increases in areas where the current proposed densities are 'up to 30 dwelling per hectare' (dph) and 'up to 35 dph' could yield significant increases in the number of dwellings at this site.

- 2.5 By considering further options for a railway station at this site could also facilitate higher densities of development in proximity to any potential railway station site. Given the restricted supply of land in the South Hampshire sub-region building at exceptionally low densities would represent a missed opportunity as the PUSH authorities plan forward to 2036 and onto 2050.
- 2.6 It is clear from the NPPF that planning policies and decisions should support development that makes efficient use of land. It states that where there is an existing or anticipated shortage of land for meeting identified housing needs it is especially important that planning policies and decisions avoid homes being built at low densities and ensure the developments make optimal use of the potential for each site.
- 2.7 Such increases in densities would make public transport and other facilities more viable and would also reduce the need to develop in the FGLS Strategic Gap.

3.0 Other locations

- 3.1 FBC should also consider increasing densities in sustainable locations within Fareham Borough including within, and adjacent to centres, and in close proximity to railway stations. This would also ease pressure on the Strategic Gap.

END



GOSPORT
Borough Council

Mr Richard Jolley
Director of Planning and Regeneration
Fareham Borough Council
Civic Offices,
Civic Way,
Fareham,
Hampshire.
PO16 7AZ

Please ask for:

Jayson Grygiel

Direct dial:



28th February 2020

By e-mail
localplanconsultation@fareham.gov.uk

Dear Richard

Fareham Borough Local Plan 2036: Supplement

Thank you for consulting Gosport Borough Council (GBC) on the Supplement document for the Fareham Borough Local Plan 2036. I can advise that the document was considered at the Council's Regulatory Board of 26th February 2020.

A summary of our representations, based on the Board's resolution, is set out below with more detailed comments attached (Appendix 1). These additional comments also form part of the Council's representations.

- That this Council's previous comments to the Draft Fareham Local Plan 2036 (DFLP 2017) and the subsequent Issues and Options document are fully considered with these latest representations.
- That this Council objects to the overall Development Strategy including the plan that identifies the South Newgate Lane allocation and the Strategic Growth Area as it does not represent 'good growth'.
- That this Council objects to the proposed policy on the Five Year Housing Supply as it presumes in favour of development outside of the settlement boundaries prior to other types of land within urban area boundaries and within more sustainable locations.
- That this Council maintains its strong objection in full to the proposed residential allocation at Newgate Lane (referred to in the previous Draft Fareham Local Plan (DFLP) (2017) as HA2) for the reasons set out below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;

- The proposal will negate the benefits provided by the recent improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport Borough and Stubbington residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
 - The proposal will significantly harm the amenities of local Gosport residents by the introduction of new access points to existing residential areas, which due to the scale of the proposal would lead to a significant increase of traffic on residential roads;
 - The proposal, as previously described in the DFLP is very car dependent with no provision for public transport. This would exacerbate the number of trips using Newgate Lane;
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities.
- That this Council objects that the HA2 allocation was not subject to a second consultation as part of this Supplement given the problems that arose with the initial consultation in 2017 on the Draft Fareham Local Plan relating to the access arrangements to the site, particularly in relation to Tukes Avenue.
 - That this Council strongly objects to the designation of Strategic Growth Areas (SGAs) including the South of Fareham SGA within the current Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington for the following reasons:
 - The promotion of SGAs at this stage prejudices work being undertaken by local planning authorities at a multilateral level to ascertain the most appropriate sustainable broad locations for development over the period to 2036 and beyond to 2050, known as Strategic Development Opportunity Areas.
 - The South of Fareham SGA does not represent 'good growth' for the residents of Gosport, Lee-on-the-Solent, Stubbington, Hillhead and south Fareham and therefore is not considered to be sustainable development.
 - It is imperative to safeguard effective strategic transport routes through the Strategic Gap to improve accessibility to, and from, the Gosport Peninsula to support the local economy. Further housing allocations will individually and cumulatively exacerbate accessibility constraints for reasons detailed in Appendix 1.
 - Further housing allocations will lead to the extensive erosion of the Strategic Gap, the protection of which is a long established planning principle in the South Hampshire area, as identified by the Partnership for South Hampshire's Spatial Position Statement that aims to prevent coalescence of settlements, maintain a sense of place and settlement identity, and provide a countryside setting for the sub region and local communities.
 - That this Council expresses its concerns that Fareham Borough Council may not be fulfilling its duty to cooperate because it is not considering the outcome of the joint Partnership for South Hampshire work on Strategic Development Opportunity Areas as part of the sub-regional Statement of Common Ground

which will assess the most appropriate locations for development in the sub region.

- That Fareham Borough Council are urged to reconsider the proposals for HA2 and the SGA which are contrary to the objectives of the climate change and air quality policies.

In the light of the above comments it will be important to maintain our ongoing dialogue as part of our bilateral Statement of Common Ground work as well as our continued involvement as part of the multilateral PUSH initiatives. In the meantime if you require any clarification on these matters please do not hesitate to contact me.

Yours sincerely

Debbie Gore
**Head of Planning and Regeneration
and Assistant to the Chief Executive**

Appendix 1: Gosport Borough Council's detailed representations to the Fareham Local Plan: Supplement (February 2020)

The detailed comments, summarised in the attached letter, are set out below and form part of Gosport Borough Council's representation to the Fareham Local Plan 2036.

1 Development Strategy

- 1.1 Whilst the principles of good growth are supported it is considered that the proposed development strategy does not represent 'good growth' for the residents of Gosport Borough nor those of Fareham Borough particularly those in Stubbington and Hillhead and those living in Fareham itself, including those within or in close proximity to the Air Quality Management Areas.
- 1.2 The proposed HA2 allocation and the Strategic Growth Area, with limited transport choice, will exacerbate existing traffic congestion issues associated with the Gosport Peninsula and increase air pollution to the detriment of local residents. It will hamper economic opportunities and investment potential within Gosport Borough.
- 1.3 The plan fails to consider cross-boundary issues and should recognise the importance of the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington.
- 1.4 The Development Strategy does not acknowledge the issues relating to the transport issues on the Gosport Peninsula. The existing boundaries of the Strategic Gap should be retained in order to maintain an effective transport corridor through the gap. Additional development immediately adjacent and accessing the route will negate all the benefits of the recently improved and commenced road infrastructure. This investment has been implemented to address existing deficiencies not facilitate new development. These issues are expanded further in the following sections.

2 Housing

Unmet need

- 2.1 It is acknowledged that the Fareham Local Plan:*Supplement* recognises that it may likely have to address the unmet need from neighbouring authorities and consequently the overall housing figure will have to be confirmed.
- 2.2 It is considered that the issue of unmet need is a very important matter to address on a sub-regional basis as a number of local authorities, including Gosport Borough, have a dense urban character and collectively have a significant housing requirement when using the Government's standardised

methodology. It is important to recognise that in order to create sustainable communities across South Hampshire it is necessary to ensure that: there is sufficient land for employment to create local jobs and reduce out-commuting and congestion; there are genuine, affordable and convenient public transport choices; and there is sufficient quality open spaces to meet environmental, recreational and health needs. Consequently the Council supports the joint working initiative of the PfSH Statement of Common Ground and the evidence which will lead to a shared spatial strategy. This will identify the most appropriate locations within the sub-region for new growth to 2036 and ideally towards 2050 to ensure comprehensive long-term good planning for the sub region. As part of the evidence several broad areas across South Hampshire will be independently assessed regarding their suitability for large scale development considering environmental and infrastructure factors. These will be known as Strategic Development Opportunity Areas (SDOAs).

- 2.3 The Fareham Local Plan identifies two Strategic Growth Areas (SGAs) which could potentially meet sub-regional unmet need. These are: an Area north of Downend near Wallington; and the area South of Fareham. This Council objects to the SGAs particularly the South Fareham SGA on the basis that the sub regional work has yet to be completed on potential SDOAs. Further details are set out later within these representation.

Five year housing supply policy

- 2.4 The FLP:*Supplement* includes a five year housing land supply policy which states that where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements set out in the Local Plan, additional housing sites outside the urban area boundary may be permitted where they meet certain criteria including:
- The proposal is relative in scale to the demonstrated five year housing land supply shortfall;
 - It is sustainably located adjacent to, and well related to, the existing urban area boundaries and can be well integrated with the neighbouring settlement;
 - The proposal is sensitively designed to reflect the landscape character and setting of the settlement and to minimise any adverse impact on the countryside and, if relevant the Strategic Gaps.
- 2.5 The Council objects to this policy as it implies that if Fareham's five year housing supply is not met the first area of search is outside of the urban area boundary. Instead the policy should refer to sites within urban areas, brownfield land, underutilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered.

- 2.6 The Council also objects to the criterion relating to strategic gaps which is also covered in more detail later in this representation.

3 Housing Allocations and maintaining an objection to the HA2 allocation

Newgate Lane South residential allocation (HA2)

- 3.1 The *Supplement* states it is not re-consulting on the proposed allocation in the DFLP (2017) which included the Newgate Lane South allocation known as HA2. However as this site remains identified as an allocation and there has been no additional evidence to address any of the Council's substantial concerns it is proposed that the Council reiterates the comments made previously on this matter.
- 3.2 The proposed allocation is located on the western boundary of the Borough, with Tukes Avenue and other residential roads (Heron Way, Pettycot Crescent) to the east; and the new route of Newgate Lane to the west. The HMS Collingwood playing fields are situated to the north and the Brookers Field recreation ground to the south. The key concerns are reiterated in Annex A and form part of this Council's representations to this latest document.
- 3.3 The Council would also like to make additional comments on this allocation. It is noted that the latest SHELAA provides the housing and employment land availability position within Fareham Borough as at 1st December 2019 and forms an integral part of the evidence base that underpins the Fareham Local Plan 2036.
- 3.4 The HA2 allocation is identified as three component parts in the document. With regard to the southern site it clearly recognises that the introduction of junctions along Newgate Lane South Relief Road would interfere with the free-flow of traffic which the Relief Road now provides. It adds that, *'as this and all other access would interfere with traffic flows, it is considered development of the site would be unsatisfactory. It would be feasible to develop the western part of the site from the existing Newgate Lane and incorporate measures to improve/relieve Woodcote Lane.'*
- 3.5 Similarly with regard to the middle site the potential for access to Newgate Lane South through the construction of a roundabout is considered unsatisfactory and a revised option would need to be explored and that the identification of a suitable highway access is pending.
- 3.6 With regard to the northern site it states that suitable highway access has been identified onto Tukes Avenue. This Council would like to understand where this access is located as this has not been identified in the FLP: *Supplement*. It is important to note that an erratum was issued to the DFLP (2017) which withdrew the original proposed access onto Tukes Avenue as local homeowners had not been informed or had given their permission for an access.
- 3.7 It is recognised that the SHELAA is an evidence study not a policy document however it is necessary to understand whether FBC are

proposing to amend the HA2 policy. There are no proposed changes identified in the FLP: *Supplement* and the policy included in the DFLP 2017 referred to access off Newgate Lane whereas the evidence in the SHELAA identifies significant problems with access off Newgate Lane. This Council and HCC objected to the proposed allocation being accessed off Newgate Lane due to the detrimental impact that 475 dwellings directly onto the recent road improvements would have on north-south movements on the strategic transport corridor.

- 3.8 The Council maintains an objection on highway and accessibility grounds due to the impact that 475 dwellings would have on the residential roads of Bridgemary. No evidence is provided on the scale of this impact nor are there any details provided on the potential access routes.
- 3.9 In the light of this the Council maintains its objection to the HA2 allocation due to these accessibility issues (together with the other reasons set out in Annex A) and would also question whether the development is actually deliverable.

4 Strategic Growth Areas

- 4.1 The Development Strategy recognises that FBC has an obligation to work with neighbouring authorities in order to identify and address unmet need within the region. PfSH are working on a Statement of Common Ground to identify Strategic Development Opportunity Areas (SDOAs) that could be selected to meet the unmet needs in the sub-region. This work will continue through 2020 with a final presentation to PfSH Joint Committee in early 2021. FBC states that it will be an active partner in these discussions and that the Publication (Reg. 19) version will need to address unmet need.
- 4.2 The Council strongly objects to the Strategic Growth Area based on two principles which are set out fully in the rest of this section:
- 1) They pre-judge the work currently being undertaken by PfSH regarding the most appropriate Strategic Development Opportunity Areas and that this work should be concluded before any SGAs are identified.
 - 2) That the South of Fareham SGA fails to acknowledge the previous concerns made by Gosport Borough Council regarding: the issues concerning HA2; the need to preserve a transport corridor to, and from, the Peninsula; and the need to maintain a strategic gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington and that any significant development would affect the long established integrity and function of the Strategic Gap.

1) PfSH work

- 4.3 The PfSH work on SDOAs is in the process of being procured in which an independent consultant will consider the appropriateness of a number of sites to deliver housing need in South Hampshire to 2036 and beyond. This includes a number of broad areas across South Hampshire as well as the potential to intensify development on currently identified major

development areas.

- 4.4 It is considered necessary for the findings of this work to be concluded and an approach agreed by PfSH Joint Committee before these Strategic Growth Areas are identified. The identification of SGAs could prejudice this work and fails to recognise this Council's significant concerns regarding the South Fareham SGA. Alternative sites may be more suitable and if the SGAs are already identified in an emerging Fareham Local Plan there may be reluctance to bring these sites forward in other parts of the sub region.
- 4.5 For example there may be opportunities to increase the residential quantum at Welborne itself by increasing densities. Even marginal density increases in areas where the current proposed densities are 'up to 30 dwelling per hectare' (dph) and 'up to 35 dph' could yield significant increases in the number of dwellings at this site.
- 4.6 By considering further options for a railway halt at Welborne would also facilitate higher densities. Given the restricted supply of land in the South Hampshire sub-region building at exceptionally low densities would represent a missed opportunity as the PfSH authorities plan forward to 2036 and onto 2050. Such increases in densities would make public transport and other facilities more viable and would also reduce the need to develop in the Fareham, Gosport, Lee-on-the-Solent, and Stubbington (FGLS) Strategic Gap.
- 4.7 It is clear from the NPPF that planning policies and decisions should support development that makes efficient use of land. It states that where there is an existing or anticipated shortage of land for meeting identified housing needs it is especially important that planning policies and decisions avoid homes being built at low densities and ensure the developments make optimal use of the potential for each site.

2) Specific issues regarding the South Fareham SGA

- 4.8 It is clear that the Fareham SGA policy will affect the function and integrity of the Strategic Gap which has previously been agreed by both Councils and undermines the sub regional objectives of maintaining a Strategic Gap. Such development will have a detrimental impact on existing residents in Gosport, Lee-on-the-Solent, Stubbington, Hillhead and southern Fareham.
- 4.9 There is currently no detailed evidence available regarding the scale of development proposed and consequently the likely impacts on traffic generation, infrastructure and the environment. Whilst it is recognised that this is difficult at this stage as the overall quantum is not yet known it would be useful to have an understanding of whether various environmental and infrastructure constraints have been considered.
- 4.10 Some of the Council's key concerns relating to the Strategic Growth Area relate to the principles of developing in the FGLS Strategic Gap and are detailed further below:
- Transport and Accessibility

- Air quality
- The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements.
- Protecting the Strategic Gap to deliver multi-functional benefits for local communities

- 4.11 ***Transport and accessibility:*** One of the Council's primary concerns is the impact of potential new development, including any additional allocations in the SGA and the proposed HA2 allocation, will have on the effectiveness of the strategic transport corridor through the existing Strategic Gap. It is considered that any allocations which have access directly onto the recently improved Newgate Lane and the proposed Stubbington Bypass will negate the benefits these proposals will deliver to improve accessibility to, and from, the Peninsula.
- 4.12 These improvements are aimed at addressing existing acute transport infrastructure deficiencies, not to enable development on greenfield sites directly adjacent to the routes. Instead this improved infrastructure can bring regeneration benefits to difficult brownfield sites in Gosport and make them more attractive to investors. The NPPF is very clear that policies should promote the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.
- 4.13 The issue of maintaining an effective transport corridor is imperative for Gosport's future prosperity. The Stubbington Bypass route is the only opportunity to improve vehicular access to the Borough. If the benefits of the Stubbington Bypass are negated by significant development being built with access directly onto the Bypass, this last opportunity would be lost and there would be a real sense that Gosport has been 'blocked in'.
- 4.14 This would perhaps be less significant if Gosport had its own railway station and had a reasonable job density rate with limited out-commuting. However this is certainly not the case.
- 4.15 Gosport has the lowest job density in the South East of England and one of the lowest in England at only 0.5 jobs per resident person of working age. Such a low job density has significant implications for the Borough including the considerable scale of daily out-commuting which puts tremendous pressure on the existing road system resulting in acute traffic congestion and high levels of air pollution as evidenced in the Air Quality Management Areas identified within Fareham Borough at the north end of the Peninsula. This congestion results in the road network reaching full capacity and an extended peak time spreading on key routes. This actual congestion as well as the wider perception of congestion that exists can act as a disincentive for business and employment investment. Gosport has limited transport options with no fixed rail link and hence the effectiveness of the small number of road routes from Gosport is even more important.
- 4.16 **Specific accessibility issues relating to the SGA and Newgate Lane East** It is likely that a significant proportion of traffic from any development in the SGA will require access along Newgate Lane towards Fareham Town

Centre. It is important to recognise that Newgate Lane East and other associated improvements were designed to achieve the following:

- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
- increasing capacity and easing existing congestion on the route;
- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

4.17 These objectives would be undermined by potential development within a SGA. It was not intended that the strategic highways improvements would facilitate new housing development. Gosport Borough Council is very concerned that development within the SGA, together with HA2, will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

4.18 The earlier DFLP was accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently, it is already recognised that traffic exceeds the available capacity on this strategic route. Table 2 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience '*more noticeable increases in traffic flow.*'

Table 2: Road capacity on Newgate Lane

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan Review

4.19 With any further allocations within this area this situation would be exacerbated still further plus it will be necessary to take into account the additional allocations being put forward as part of the emerging work for the Gosport Borough Local Plan 2036.

4.20 The latest transport modelling work suggests numerous junctions in the area will suffer from severe or significant impacts over the period to 2036 when just taking into account existing permissions and adopted Local Plan

allocations. This work incorporates committed transport schemes (such as the Stubbington Bypass). This situation is further exacerbated by the proposed Fareham Local Plan allocations and does not appear to have included any proposed development in the SGA, as the potential quantum of development is not yet known. It is clear however that any development in the SGA would have a detrimental impact on an already severely congested network on the Peninsula. Further work is to be undertaken as part of a Transport Assessment which will consider if there are any appropriate mitigation measures. This strengthens the case that such a designation should await the outcome of the aforementioned PfSH work as there are likely to be more appropriate locations for major development which have genuine transport choices in less congested parts of the sub-region or beyond. The PfSH work will include transport modelling work.

- 4.21 **Potential impact on the effectiveness of the Stubbington Bypass:** It is important to note that the DFLP (2017) stated in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes.
- 4.22 The DFLP recognised that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text in the DFLP acknowledged this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It stated that the bypass is not being provided with an intention of serving or facilitating additional new homes. GBC consider that FBC's position in the DFLP is still valid and should be maintained. There is currently no information available regarding the impact that the SGA will have on the effectiveness of the Stubbington Bypass and how development will be accessed.
- 4.23 **Air quality:** Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 of the DFLP which promotes sustainable transport to mitigate this impact. This is likely to be difficult for allocations in the Strategic Gap of this scale with limited public transport choice.
- 4.24 **The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements:** The Strategic Gap is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.
- 4.25 The *Supplement* consultation is a significant change in the long-established position as it appears to accept large-scale development in the Strategic

Gap. This Council strongly opposes this change in approach and considers that the additional residential proposals will have a significant and detrimental impact on the current form and function of the Strategic Gap and no amount of 'careful planning' would be able to mitigate these impacts.

- 4.26 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- 4.27 FBC's current Policy CS22 states that *'development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements'*. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.
- 4.28 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.
- 4.29 It is considered the text of Policy CS22 remains relevant in relation to the strategic gap. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,
- 'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'*
- 4.30 The DFLP (2017) also included a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identified a Strategic Gap between *'Fareham/Bridgemarky and Stubbington/Lee-on-the-Solent'*. It stated, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements.'* The justification text acknowledged that, *'retaining the open farmland gap*

between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'. It also clearly stated in Paragraph 4.39 that, 'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.' This Council agrees that this gap should be maintained.

4.31 Allocations in the Strategic Gap would also contradict FBC's own evidence which seeks to protect the strategic gap as set out in the Fareham Landscape Assessment (2017) which incorporates a review of the Strategic Gap.

4.32 The Council's previously mentioned comments relating to the Woodcot area which includes the land covered by the proposed HA2 Newgate Lane allocation are re-iterated in Annex A of this representation. The study also includes a character area which relates to the gap between Fareham and Stubbington covered by the SGA. There is a specific section on the Review of the Strategic Gap Designation. It concludes,

'This area is a cohesive agricultural landscape which performs multiple roles in respect of the primary and secondary purposes and functions of the Strategic Gap. Even minor encroachment beyond the existing, strong settlement boundary along the southern edge of Fareham could potentially disrupt local settlement pattern and character and have an adverse effect on the Gap functions and the overall integrity of the agricultural landscape. There may be some scope for very modest 'rounding off' of Stubbington on its northern edges, within existing parcels of land where development could be integrated without unacceptable impacts. Overall, however, it is recommended that the Gap boundaries remain tightly drawn around the existing settlement edges, with allowance for development only in exceptional circumstances where the purposes and integrity of the Gap can be maintained and significant GI and other benefits would result.'

4.33 The Council agrees with the findings of the Study regarding the importance of the Fareham/Stubbington Gap area to be maintained. These findings also raise the question whether there may be preferable locations for very limited allocations here before the HA2 allocation is considered as the evidence on the Woodcot area concludes,

'Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'

4.34 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that these areas should remain an integral part of the Strategic Gap fulfilling their current function.

4.35 Whilst recognising that circumstances have changed in terms of the need to accommodate additional housing numbers it is considered that there is an even stronger imperative to protect these important strips of land

between settlements in the form of the Strategic Gap which certainly continue to perform the long-established planning function that both Councils have worked together to protect.

4.36 It is also recognised that the local plan process is the appropriate time to review such designations, however it is considered that the proposed changes will affect the integrity of the remaining gap by significantly reducing its width. This and other proposed residential allocations by their sheer scale will undoubtedly harm the character of the gap and will diminish the physical and visual separation of the settlements.

4.37 **Protecting the Strategic Gap to deliver multi-functional benefits for local communities:** This Council proposes that we work together with FBC bilaterally and as part of PfSH to find a long-term strategy for the strategic gaps which serve a number of existing functions that could be further diversified. These functions include:

- Strategic transport corridor for critical road infrastructure to, and from the Peninsula including the recent Newgate Lane improvements and the Stubbington Bypass.
- The Daedalus employment areas which have been designed to reflect the character of this part of the Gap
- Utilities including the Peel Common Waste Water Treatment Works
- Sustainable power - Solar farms and IFA2
- Recreational land to improve cycle and walking routes to facilitate countryside access between the communities and links with Titchfield and the Meon Valley.
- Land for environmental mitigation
 - Land required for nitrate mitigation
 - Land required to deflect recreational pressure from sensitive coastal habitats and/or create Brent Goose refuges to allow development to take place in more sustainable locations
 - Land required for biodiversity net gain
 - Land required for carbon storage
- Maintaining local food production

4.38 Therefore as part of resolving the outstanding issues, to be set out in the Statement of Common Ground, that FBC considers the option of establishing a multi-functional corridor which includes the various uses set out above. It is considered appropriate that the agreed joint long term strategy would include the whole strategic gap including areas within Gosport Borough to ensure that recreational and environmental benefits are taken together.

5 **The Natural Environment**

Climate Change Policy

- 5.1 The climate change policy promotes a mitigation and adaptation to climate change through amongst other things, a development strategy that minimises the need to travel by allocating sites and generally directing development to locations with better services and facilities, or where they are capable of being improved. This Council disputes that the overly flexible approach being promoted by the five year housing land policy, which presumes in favour of out of settlement sites when there is no five year housing supply, is consistent with this Policy. Similarly the proposed SGA policy will exacerbate travel by private car. It is considered that the PfSH work on SDOAs across South Hampshire needs to consider the most sustainable locations for development first.

Air quality policy

- 5.2 Similarly it is difficult at this stage to envisage how the proposals in the existing Strategic Gap including the HA2 allocation and the potential in Strategic Growth Area can meet the requirements of the proposed air quality policy. This states that development will be permitted if it positively contributes towards the delivery of the Council's Air Quality Action Plan by mitigating the effects of development on air quality within the Air Quality Management Areas and/or any Clean Air Zones. Given that the HA2 and any SGA sites will be largely car borne with a significant proportion of traffic using Newgate Lane it is difficult to understand how these will positively contribute to the air quality with in the AQMA at Quay Street.

Annex A: Re-iteration of comments made to the Draft Fareham Local Plan (2017) relating to the Newgate Lane South allocation

- That this Council maintains its objection in full to the proposed residential allocation at Newgate Lane (referred to in the previous Draft Fareham Local Plan (DFLP) (2017) as HA2) for the reasons set out below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;
 - The proposal will negate the benefits provided by the recent improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
 - The proposal will significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would lead to a significant increase of traffic on residential roads;
 - The proposal, as previously described in the DFLP is very car dependent with no provision for public transport. This would exacerbate the number of trips using Newgate Lane;
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities.

Further details are set out below:

- Strategic Gap*
- A1 In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between '*Fareham/Bridgemark and Stubbington/Lee-on-the-Solent*', which is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.
- A2 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- A3 FBC's current Policy CS22 states that '*development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements*'. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.

A4 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

A5 It is considered that this remains relevant in the case of the Newgate Lane area. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,

'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'

A6 The latest DFLP also includes a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identifies a Strategic Gap between *'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent'*. It states, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements'*. The justification text acknowledges that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly states in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.'* This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.

A7 The proposed removal of this land from the Strategic Gap also appears to be at odds with FBC's own supporting evidence. The Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the 'Woodcot area' which includes the land covered by the proposed Newgate Lane allocation. It concludes,

'This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'

A8 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area should remain an integral part of the Strategic Gap.

A9 Whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.

Transport and accessibility

A10 The Council also objects to the proposed allocation due to the potential negative impacts on the new Newgate Lane route. The new route was designed to achieve the following:

- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
- increasing capacity and easing existing congestion on the route;
- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

A11 These objectives would be undermined by the proposed development. It was not intended that the improvements would facilitate new housing development.

A12 The DFLP is accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 3 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience '*more noticeable increases in traffic flow.*'

Table 3: Road capacity on Newgate Lane

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan Review

A13 At the present time this allocation has not been assessed by the Local

Highway Authority to determine the implications on the highway capacity of Newgate Lane and no modelling work has been assessed to consider the trip generation from this level of development, either in terms of numbers of additional vehicles or their likely distribution on the highway network or highway safety. Therefore the Council has no option but to object to the proposed allocation in the DFLP on this issue at this stage. Gosport Borough Council is very concerned that the proposed allocation will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

- A14 The north-south movements along Newgate Lane should not be hindered by any proposed new access arrangements for the proposed allocation and the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'*
- A15 Due to the lack of detailed available information it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.
- A16 Given that the proposed allocation may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether this site together with other potential residential developments on the south side of Fareham could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. It is important to note that the DFLP states in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes. FBC is therefore not being consistent in its policy approach between the Stubbington Bypass and the Newgate Lane improvements.
- A17 The Newgate Lane allocation policy (HA2) includes a criterion that makes provision for off-site highway improvements and mitigation works, however, this Council requires further details of such measures, and questions whether the principle of any proposal at this site would be able to satisfactorily mitigate these impacts.
- A18 The Council is also concerned that the proposed allocation would not meet the requirements of the DFLP sustainable transport policy (Policy INF2). Amongst other things, this policy aims to ensure that development:

- does not demonstrate a severe cumulative impact (causing demonstrable harm) on the operation, safety or accessibility to the local or strategic highway networks; and
- mitigates impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development on the network, through provision of improvements or enhancements to the existing network to accommodate additional traffic; or contributions towards necessary or relevant transport improvements.

- A19 In the light of the above policy it is considered that the proposed allocation may not be able to provide any meaningful improvements to satisfy these requirements given the current and ongoing access issues to and from the Gosport Peninsula.
- A20 The DFLP originally proposed two other vehicular accesses (in addition to Newgate Lane) which link the potential new allocation to the existing residential communities in Gosport. This includes Brookers Lane as a secondary access for a limited number of dwellings.
- A21 The other proposed access off Tukes Avenue has now been withdrawn following a recently issued addendum by FBC which reads, *'The site promoter has advised Fareham Borough Council that the potential access identified via the demolition of two houses on Tukes Avenue (165 and 167) is a factual error. The site promoter has confirmed that potential vehicle access via these properties is not being pursued'*
- A22 Notwithstanding that the residents of these and adjacent properties were most unfortunately not previously notified of these proposals, it is not clear from this statement whether the site promoter will be seeking an alternative access on the eastern boundary. It is considered that any such access points from housing areas within Gosport, will add to traffic on the local highway network within Gosport, which again has not yet been quantified in terms of number/distribution and junction/link capacity. The nature and scale of these access points will have a direct impact on their use/attractiveness, particularly if through routes are created. The creation of such accesses may create rat-runs through the existing residential areas within Gosport, due to perceived journey time savings compared with joining Rowner Road/Peel Common Roundabout. This could be exacerbated with the development of the Stubbington Bypass.
- A23 Despite the addendum significant concerns remain regarding any proposed access onto Tukes Avenue. These include:
- The amenities of neighbouring residents as an access road will serve a considerable number of dwellings;
 - The capacity of Tukes Avenue and adjoining roads to take the additional traffic; and
 - The proximity to facilities such as Woodcot Primary School and the impact on pedestrian safety.
- A24 There is no mention of improving public transport with regard to the proposed allocation. This needs further consideration to reduce the site's car dependency which would add further pressure on Newgate Lane. This will also have a detrimental impact on the existing Air Quality Management

Areas within Fareham. It will be necessary to explore strategic transport options such as the potential for a new bus rapid transit link which could connect Lee-on-the-Solent, Daedalus, Newgate Lane, and the Busway through to Fareham.

- A25 Cycle and pedestrian links to the adjacent Bridgemary and Peel Common are identified in Policy HA2.

Residential amenities and design

- A26 Any development of this scale on greenfield land will create significant concerns from existing residents particularly in areas immediately adjoining the site. It will be critical that their amenities are not harmed by any future proposals on this site and this should be reflected in Policy HA2.

School provision

- A27 Provision is included in the policy to ensure improvements to local schools and early-years childcare (as identified by the Local Education Authority). However, there is insufficient detail of how local school places could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on this site is likely to include a high proportion of households with children.

Community facilities

- A28 It will also be important to understand whether any new development at Newgate Lane can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.

- A29 Policy CF1 of the DFLP recognises the need for community facilities as part of large residential developments and that these should be delivered to prescribed timescales to meet the needs of the community. The DFLP specifically mentions Bridgemary School as the primary location for community facilities (sport pitches, courts, hall and stage, and various meeting and conference rooms for hire). It states that these facilities are generally less than 1km from within the allocation and that it is not considered necessary for additional space to be provided with the allocation.

- A30 Policy LP32 of the GBLP requires the consideration of community facilities for new residential developments (normally for sites of 100 dwellings or more). It is therefore considered appropriate for FBC to further assess the community requirements of a development of this scale and include such provision within Policy HA2.

Open space

- A31 The proposals as set out in Policy HA2 include a number of open space requirements including:
- Neighbourhood Equipped Area of Play (NEAP) and a Multi-Use Games Area for older children on-site;
 - Improvements to existing off-site sports facilities at Brookers Field and Tukes Avenue which are GBC-owned facilities.
 - The potential to take a financial contribution to improve sports pitch provision and associated facilities at Tukes Avenue Open Space and/or Brookers Field Recreation Ground.

- A32 It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

Air quality

- A33 Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 specifically to mitigate this impact for this development allocation. This may be difficult for a development of this scale with limited public transport choice. The issue of air quality is highlighted in the Interim Traffic Assessment which notes that in January 2017, Fareham and Gosport Environmental Health Partnership issued the Annual Status Report 2016, which concluded that both the existing AQMAs need to be extended as locations outside of the AQMAs had exceeded the annual mean NO₂ objective for Fareham. The AQMA extensions were agreed in October 2017.

Drainage

- A34 The area includes a number of drainage ditches which are part of the River Alver catchment. The development allocation proposes to retain and enhance these drainage ditches as part of a Sustainable Drainage System (SuDS). It will be important to understand the impact of any development on potential for surface water flooding in the vicinity and the water quality of the River Alver.

Natural environment

- A35 The proposal aims to retain existing field and tree boundaries and to incorporate street trees and verges to reflect the character of Bridgemary.

END

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy DS1: Development In The Countryside

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough Council whilst supporting the overall intention of Policy DS1: Development in the Countryside it considers that amendments are required to the wording in order for the policy to be deemed **effective** to deliver cross-boundary strategic objectives.

Comments continued on next page

B3 Extension:

Policy DS1 relates to development in the countryside and the overall approach is to limit development in the countryside outside of the urban area boundaries as defined on the Policies Map. The policy sets out those circumstances where development will be supported outside the urban area boundary. In most instances these circumstances are limited in scope and scale. In addition the policy includes five criteria (i-v) which any of the identified exceptions need to adhere to. This includes requiring developers of any such exception to demonstrate that their proposal:

- requires a site outside of the urban area;
- would conserve and enhance landscapes;
- recognises the intrinsic character and beauty of the countryside;
- is not on Best and Most Versatile agricultural land; and
- if relevant the development does not significantly affect the integrity of a Strategic Gap.

Whilst many of these exceptions appear reasonable, particularly when assessed against the five criteria outlined above, there is concern relating to development cited in point e) in the policy which reads:

Proposals for development in the countryside, which is defined as land outside the Urban Area boundary, as shown on the Policies Map, will be supported where the proposal (inter alia)

e) is for housing development compliant with one of the following policies HP1, HP2, HP4, HP5 HP6 and HP11.

The Council does not have particular concerns with the link to Policies HP1, HP2 and HP11 nor the way these policies are worded. Policy HP1 is a standard 'housing in the countryside' policy relating to the conversion of existing buildings and replacement dwellings; Policy HP2 enables very small scale development of no more than 4 dwellings in scale with its surroundings; and HP11 is a standard criteria-based policy relating to sites for gypsies, travellers and travelling show.

However the Council has concerns over the following aspects:

- The link in Policy DS1 to Policy HP4 and the wording of Policy HP4;
- The link in Policy DS1 to Policy HP5, although the wording of HP5 is not a particular issue;
- The link in Policy DS1 to Policy HP6 and the wording of Policy HP6

Taking each in turn, Policy HP4 relates to the Five Year Housing Supply and where the Council cannot demonstrate a five year supply of land for residential development, additional housing sites outside the urban area boundary may be permitted where they meet all the following criteria:

- The proposal is relative in scale to the demonstrated five year housing land supply shortfall;

- The proposal is sustainably located adjacent to, and well related to, the existing urban area boundaries and can be well integrated with the neighbouring settlement;
- The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant does not affect the integrity of a Strategic Gap;
- It can be demonstrated that the proposal is deliverable in the short term; and
- The proposal would not have unacceptable environmental, amenity and traffic implications.

The Council objects to the both the wording of **Policy HP4** and the link to DS1 policy as it implies that if Fareham's five year housing supply is not met, the first area of search is outside of the urban area boundary. Instead the policy should refer to sites within urban areas, brownfield land, underutilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered.

It is understandable why the FLP2037 has a policy relating to this matter as the Government's National Planning Policy Framework (NPPF) requires local planning authorities to have a five year housing supply and if this cannot be demonstrated the relevant allocation policies in an adopted Local Plan (even a recently adopted one) becomes out of date and consequently housing can take place on sites previously not identified for housing. Both Councils have made representations to the Government in the past regarding this matter and how it is detrimental to a plan-led system by creating uncertainty for local communities and undermining the effective provision of infrastructure to serve these new residents. This is particularly the case when such sites can proceed on a cumulative and speculative basis without a comprehensive assessment of impacts that would normally be undertaken at the local plan-making stage.

This policy is therefore aiming to set out criteria to assess any proposal that comes forward that is not allocated in an adopted Local Plan. However it is this Council's view that the presence of the policy seems to direct development towards greenfield sites quite readily before other urban and more sustainable sites are fully considered.

Policy HP5 relates to the provision of affordable housing on sites of 10 or more and the Council has no particular issue with the wording of HP5. However when it is linked with Policy DS1 it could be interpreted that FBC will accept in principle the development of any affordable housing site outside the urban area boundary. Whilst the criteria i-v exists there is concern that unsuitable developments in the Strategic Gap could be developed in a piecemeal fashion with a number of different speculative sites coming forward adjacent to each other of varying sizes. It is considered that the inclusion of a link to HP5 does not provide sufficient certainty of what development will take place over the plan period; nor does it ensure that the

environmental, transport and infrastructure implications of each affordable housing development has been fully assessed in combination with adopted allocations or other speculative proposals coming forward over the plan period.

Whilst it is not considered the intention of the policy it could potentially enable large scale housing development outside of the urban area boundary if it can be demonstrated that 40% affordable housing is being achieved.

In the light of this it is not proposed to amend the wording of Policy HP5 only that the link included in DS1 is removed. Instead if development does come forward in the countryside through other policy mechanisms this policy could still be used as each policy in the plan needs to be read in conjunction with all other relevant plans and consequently the affordable housing policy would still apply for developments over 10 dwellings. The removal of the reference in DS1 would remove this being cited as a primary reason for development in the Strategic Gap ahead of more suitable sites within the urban area in both Fareham and Gosport Boroughs.

Policy HP6 which is also linked to point e) of Policy DS1, relates to affordable housing exception sites and is a commonly used policy across England to allow small affordable housing sites adjacent to villages to be developed on land which would not normally be permitted to come forward. This would enable viable schemes to be implemented to meet very local needs. In principle the Council does not have an objection to such a policy nor its link to DS1 enabling such schemes to come forward outside the urban area. However the way in which the policy is worded could enable the development of significant schemes in the strategic gap. The policy includes the following text:

Policy HP6: Exception Sites

The development of Rural Exception Sites will be permitted where:

All dwellings are affordable (as defined in the NPPF); and

The affordable delivery is not meeting the affordable housing need and the development is relative in scale to the shortfall; and

The development is located adjacent to, and well related to, the existing urban area boundaries; and

The affordable rent products will be brought forward by, and will be managed by, a not for profit social housing provider who is regulated by Homes England; and

The affordable housing meets the local needs of the adjacent settlement.

The development of Entry-Level Exception Sites suitable for first time buyers (or those looking to rent their first home) will be permitted where:

The site is adjacent to existing settlements; and

All dwellings are affordable (as defined in the NPPF), and a range of affordable tenure types, including those that are suitable for first-time renters or buyers are provided; and

*The site is less than 1 hectare or relative in scale (does not exceed 5% of the size of the adjacent settlement); and
It can be demonstrated, based on an up to date local housing needs assessment, that the need for the housing proposed will not be met through the allocations in the Plan or development with extant planning permission.*

Whilst it appears from the accompanying justification text that the intention of the policy is to enable the development of small sites there is concern that the wording of the policy as shown above could be used to enable much larger scale development. For example the first part of the policy could potentially facilitate a single or a series of large scale affordable housing developments in the Strategic Gap. If such schemes are promoted speculatively in a number of locations in the Strategic Gap there would be no opportunity to assess the in-combination environmental, landscape or infrastructure implications for the Gosport Peninsula.

The second part of the policy would allow entry-level exception sites with a limit of 1 hectare and a proviso that the scheme does not exceed 5% of the size of the adjacent settlement. Potentially this could lead to a series of 1 hectare entry home exception sites to be developed adjacent to the Gosport Borough boundary and as the town is large the 5% restriction would be meaningless.

It is clear from the recent number of speculative applications in the Strategic Gap how both parts of the policy (together with HP4 and HP5) could be used by developers to argue a case for development in these locations with the detrimental implications as set out previously in the Council's objections to the Regulation 18 consultations. Whilst this does not appear to be the policy's intention the wording could encourage speculative development to come forward within the Strategic Gap.

The Council is particularly concerned that the proposed wording and links will undermine the effectiveness of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including its function of separating the settlements, providing an effective transport corridor serving the Gosport Peninsula as well as its role for providing green infrastructure benefits for the area. This representation and the Council's concerns regarding the impact of development within the Strategic Gap should be read in conjunction with the Appendix submitted with the Council's representation relating to Policy DP2.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Link with HP4: If Policy DP1 is to be linked with Policy HP4 then Policy HP4 needs to be changed to reflect that sites in the countryside are not the first area of search for development if there is not a five year supply. Instead other sources of supply should be identified including sites within urban areas, brownfield land, under-utilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered.

Link with HP5: To remove link to Policy HP5 in part e of Policy DP1 as the link implies that any affordable housing scheme will be accepted in the countryside in addition to the provisions of HP6. The link is not necessary, instead if an affordable housing came forward through a different policy mechanism Policy HP5 could still be applied as policies are read in conjunction with each other. It is not necessary to provide an explicit link in HP5 as it infers that any and all affordable housing schemes would be treated as acceptable outside the urban area (not just those exception sites referred to in Policy HP6).

Link with HP6: If Policy DP1 is to be linked with HP6, the wording of the policy HP6 c) needs to be amended to refer to, 'existing urban area boundaries for settlements that are within Fareham Borough only'. This would then provide clarity that development adjacent to Gosport Borough would not be considered under this policy. The policy also needs to set an upper limit of what is meant by 'small sites' as identified in the justification text (paragraph 5.46 of FLP) and this needs to be set out in the Policy itself. This will avoid unintended significant development south of Fareham in the Strategic Gap or east of Newgate Lane East. Finally there needs to be some explicit wording which resists successive one hectare parcels of land coming forward in the same vicinity.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

These suggested modifications would make the policy sound as it would become an effective policy by improving clarity by providing sufficient protection of the countryside and directing development to urban brownfield sites. It would meet cross-boundary objectives. Consequently this would be in accordance with the National Planning Policy Framework

B4c Your suggested revised wording of any policy or text:

Remove link to Policy HP5 in DP1

If wording as suggested above for policies HP4 and HP6 then it would be appropriate to retain the links in DP1

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Council is prepared to attend any session regarding the future of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including the proposed wording changes to Policy DP1 if the Inspector considers it will assist the examination.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

HP4: Five Year Housing Supply

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough Council objects to the detailed wording of Policy HP4 as it has the potential to significantly undermine the Local Plan's policies which aim to protect the countryside and the Fareham, Gosport, Lee-on-the-Solent and Stubbington Strategic Gap. Consequently as currently worded it is not considered to be **effective** for delivering strategic cross-boundary objectives.

B3 Extension:

Policy HP4 relates to the Five Year Housing Supply and where the Council cannot demonstrate a five year supply of land for residential development, additional housing sites outside the urban area boundary may be permitted where they meet all the following criteria:

- The proposal is relative in scale to the demonstrated five year housing land supply shortfall;
- The proposal is sustainably located adjacent to, and well related to, the existing urban area boundaries and can be well integrated with the neighbouring settlement;
- The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant does not affect the integrity of a Strategic Gap;
- It can be demonstrated that the proposal is deliverable in the short term; and
- The proposal would not have unacceptable environmental, amenity and traffic implications.

The Council objects to the both the wording of **Policy HP4** and the link to DS1 policy as it implies that if Fareham's five year housing supply is not met, the first area of search is outside of the urban area boundary. Instead the policy should refer to sites within urban areas, brownfield land, underutilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered

It is understandable why the FLP2037 has a policy relating to this matter as the Government's National Planning Policy Framework (NPPF) requires local planning authorities to have a five year housing supply and if this cannot be demonstrated the relevant allocation policies in an adopted Local Plan (even a recently adopted one) becomes out of date and consequently housing can take place on sites previously not identified for housing. Both Councils have made representations to the Government in the past regarding this matter and how it is detrimental to a plan-led system by creating uncertainty for local communities and undermining the effective provision of infrastructure to serve these new residents. This is particularly the case when such sites can proceed on a cumulative and speculative basis without a comprehensive assessment of impacts that would normally be undertaken at the local plan-making stage.

This policy is therefore aiming to set out criteria to assess any proposal that comes forward that is not allocated in an adopted Local Plan. However it is this Council's view that the presence of the policy seems to direct development towards greenfield sites quite readily before other urban and more sustainable sites are fully considered.

The Council is particularly concerned that the proposed wording of this policy will

undermine the effectiveness of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including its function of separating the settlements, providing an effective transport corridor serving the Gosport Peninsula as well as its role for providing green infrastructure benefits for the area. This representation and the Council's concerns regarding the impact of development within the Strategic Gap should be read in conjunction with the Appendix submitted with the Council's representation relating to Policy DP2.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Policy HP4 needs to be changed to reflect that sites in the countryside are not the first area of search for development if there is not a five year supply. Instead other sources of supply should be identified including sites within urban areas, brownfield land, under-utilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

This suggested modification would make the policy sound as it would become an effective policy by improving clarity and providing sufficient protection of the countryside and directing development to urban brownfield sites. Consequently this would be in accordance with the National Planning Policy Framework regarding make efficient use of land.

B4c Your suggested revised wording of any policy or text:

A requirement of a sequential approach to sources of supply needs to be demonstrated when there it can be demonstrated that there is not a current five year supply. Other sources of supply need to be considered before greenfield land outside the urban area within the Strategic Gap is considered.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Council is prepared to attend any session regarding the future of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including the proposed wording changes to Policy HP4 if the Inspector considers it will assist the examination.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy HP6: Exception Sites

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough Council objects to the detailed wording of Policy HP6 as it has the potential to significantly undermine the Local Plan's policies which aim to protect the countryside and the Fareham, Gosport, Lee-on-the-Solent and Stubbington Strategic Gap. Consequently as currently worded the Policy is not considered **effective** as it does not deliver cross-boundary strategic objectives.

Comments continued on next page

B3 Extension:

Policy HP6 relates to affordable housing exception sites and is a commonly used policy across England to allow small affordable housing sites adjacent to villages to be developed on land which would not normally be permitted to come forward. This would enable viable schemes to be implemented to meet very local needs. In principle the Council does not have an objection to such a policy nor its link to DS1 enabling such schemes to come forward outside the urban area. However the way in which the policy is worded could enable the development of significant schemes in the strategic gap. The policy includes the following text:

Policy HP6: Exception Sites

The development of Rural Exception Sites will be permitted where:

- a) All dwellings are affordable (as defined in the NPPF); and*
- b) The affordable delivery is not meeting the affordable housing need and the development is relative in scale to the shortfall; and*
- c) The development is located adjacent to, and well related to, the existing urban area boundaries; and*
- d) The affordable rent products will be brought forward by, and will be managed by, a not for profit social housing provider who is regulated by Homes England; and*
- e) The affordable housing meets the local needs of the adjacent settlement.*

The development of Entry-Level Exception Sites suitable for first time buyers (or those looking to rent their first home) will be permitted where:

- a) The site is adjacent to existing settlements; and*
- b) All dwellings are affordable (as defined in the NPPF), and a range of affordable tenure types, including those that are suitable for first-time renters or buyers are provided; and*
- c) The site is less than 1 hectare or relative in scale (does not exceed 5% of the size of the adjacent settlement); and*
- d) It can be demonstrated, based on an up to date local housing needs assessment, that the need for the housing proposed will not be met through the allocations in the Plan or development with extant planning permission.*

Whilst it appears from the accompanying justification text that the intention of the policy is to enable the development of small sites there is concern that the wording of the policy as shown above could be used to enable much larger scale development. For example the first part of the policy could potentially facilitate a single or a series of large scale affordable housing developments in the Strategic Gap. If such schemes are promoted speculatively in a number of locations in the Strategic Gap

there would be no opportunity to assess the in-combination environmental, landscape or infrastructure implications for the Gosport Peninsula.

The second part of the policy would allow entry-level exception sites with a limit of 1 hectare and a proviso that the scheme does not exceed 5% of the size of the adjacent settlement. Potentially this could lead to a series of 1 hectare entry home exception sites to be developed adjacent to the Gosport Borough boundary and as the town is large the 5% restriction would be meaningless.

It is clear from the recent number of speculative applications in the Strategic Gap how both parts of the policy (together with HP4 and HP5) could be used by developers to argue a case for development in these locations with the detrimental implications as set out previously in the Council's objections to the Regulation 18 consultations. Whilst this does not appear to be the policy's intention the wording could encourage speculative development to come forward within the Strategic Gap.

The Council is particularly concerned that the proposed wording will undermine the effectiveness of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including its function of separating the settlements, providing an effective transport corridor serving the Gosport Peninsula as well as its role for providing green infrastructure benefits for the area. This representation and the Council's concerns regarding the impact of development within the Strategic Gap should be read in conjunction with the Appendix submitted with the Council's representation relating to Policy DP2.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

The wording of the policy HP6 c) needs to be amended to refer to, 'existing urban area boundaries for settlements that are within Fareham Borough only'. This would then provide clarity that development adjacent to Gosport Borough would not be considered under this policy. The policy also needs to set an upper limit of what is meant by 'small sites' as identified in the justification text (paragraph 5.46 of FLP) and this needs to be set out in the Policy itself. This will avoid unintended significant development south of Fareham in the Strategic Gap or east of Newgate Lane East. Finally there needs to be some explicit wording which resists successive one hectare parcels of land coming forward in the same vicinity.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

This suggested modification would make the policy 'sound' as it would become an effective policy by improving clarity and providing sufficient protection of the countryside and directing development to urban brownfield sites. Consequently this would be in accordance with the National Planning Policy Framework regarding make efficient use of land. It would better reflect cross-boundary objectives.

B4c Your suggested revised wording of any policy or text:

Suggestion for rewording are included in B4a

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Council is prepared to attend any session regarding the future of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington including the proposed wording changes to Policy HP6 if the Inspector considers it will assist the examination.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input checked="" type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policies E1, E2 and E3 relating to Daedalus

B1c Which part of the Policies Map?

Daedalus

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough Council supports the employment allocations at Daedalus (Policies E1, E2 and E3).

B3 Extension:

The FLP2037 proposes the provision of 104,000m² floorspace between 2021 and 2037 (Policy E1) in addition to the employment floorspace (52,000 m²) included in the Welborne Plan.

It identifies three employment allocations including the Faraday Business Park (Daedalus East) and the Swordfish Business Park (Daedalus West), with the other site located at Whitely. The provision at Daedalus is set out in Table 1.

Table 1: Proposed employment provision at Daedalus (within Fareham Borough)

Site	General Industrial m ²	Storage or Distribution m ²
Faraday Business Park (Daedalus East)	52,080	13,020
Swordfish Business Park (Daedalus West)	10,250	2,550
Total	62,330	15,570

This total employment floorspace within the Fareham part of the site at Daedalus represents 77,900 m² representing almost 75% of the FLP2037 employment floorspace provision. This will ultimately deliver around 127,000m² employment floorspace within the Fareham part of the Daedalus site.

This significant amount of floorspace at Daedalus will create new employment opportunities for Gosport residents reducing the need to leave the Peninsula and offer genuine transport choices other than the private car and thereby reducing congestion and air pollution.

The Faraday Business Park (Policy E2) and the Swordfish Business Park (Policy E3) represents an extension and intensification of the original strategic employment allocations included in the current adopted Fareham Local Plan (part 1) (2011). The policy includes a number of development safeguards relating to access requirements, not prejudicing the operation off the Solent Airport as well as provisions relating to design, nature conservation interests, flood risk, contamination and infrastructure.

Both sites have been taken out of the Strategic Gap when compared with the current Adopted Local Plan however the development of employment uses will be a high-quality design to reflect the style and appearance of existing development adjacent the airfield to create much needed employment opportunities on the Peninsula. The employment proposals will maintain the significant strategic gap of the airfield itself. The proposals are particularly important when Gosport Borough has the lowest job density in the South East and one of the lowest in England.

Due to the importance of the Daedalus site for both local authorities the Council **supports** the following:

- the FLP2037 vision for *'New employment space will be located in the most appropriate locations that are attractive to the market and acceptable in terms of environment impact. Existing employment areas and zones will be*

supported and all decisions made will seek a sustainable future for the employment provision in the Borough and associated jobs.'

- Strategic Priority 6 which seeks to protect important employment areas and zones and providing for future employment floorspace
- Policies E1, E2 and E3 which allocates land at Daedalus for new employment floorspace.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

None

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy E5:Existing Employment Areas

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Gosport Borough supports Policy E5 of the FLP2037 which seeks to protect existing employment areas with the relevant policy considerations should it be demonstrated with the appropriate evidence (as defined in the policy) that the sites are no longer fit for purposes. It is important that existing employment sites in Fareham including a number on the Gosport Peninsula are protected including those along Newgate Lane and close to Fareham Town Centre as they provide employment to Gosport residents and are potentially accessible by bus, cycling or walking.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

None

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy E6: Boatyards

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Policy E6 aims to protect marine-related employment uses. This policy is supported as the availability of waterfront sites around the Solent is limited and the marine businesses they support contribute to one of the key sectors of the sub-regional economy of which Gosport marine sites form part of a cluster.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

N/A

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy E7: Solent Airport

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Policy E7 relates to the Solent Airport at Daedalus which protects the site for airport related uses to support aviation activities unless it can be demonstrated that such uses are no longer financially viable.

It is important that the airfield is retained to support a large number of employers at the Daedalus site which provides one of the key reasons for many businesses to locate and expand on the site. The justification text highlights that the Solent Airport has consent for up to 40,000 flight movements per year. There are no indications in the FLP2037 that any changes will be sought on this matter.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

N/A

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

TIN2: Highway Safety and Road Network

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Policy TIN2 is supported as it aims to ensure development does not have an unacceptable impact on highway safety and the residual cumulative impact on the road network is not severe. The impacts on the local and strategic highway arising from development itself or the cumulative effects of development on the network are required to be mitigated through the provision of improvements to the local network or contributions towards off-site transport schemes.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

N/A

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐

Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy TIN3- Safeguarded Routes

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Policy TIN3 safeguards land between Delme Roundabout and the Portsmouth Boundary and the Quay Street Roundabout to support the delivery of the South East Hampshire Rapid Transit scheme. The extension will help improve public transport access to Gosport Borough and the Council is a partner organisation to improve the network and consequently the scheme and Policy TIN3 is supported.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

N/A

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

N/A

B4c Your suggested revised wording of any policy or text:

N/A

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ Yes, I want to take part in a hearing session

☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Mr
First Name:	Jayson
Last Name:	Grygiel
Job Title: (where relevant)	Manager of Planning Policy
Organisation: (where relevant)	Gosport Borough Council
Address:	Town Hall, High Street, Gosport
Postcode:	PO12 1EB
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|---|-----------|
| <input checked="" type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Paragraphs 9.122-9.125

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy NE9: Green Infrastructure

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Whilst the Council supports the aims of this policy it considers that the policy and supporting text needs to highlight opportunities to secure strategic green infrastructure improvements across Fareham Borough including within the Fareham, Gosport, Lee-on-the-Solent and Stubbington Strategic Gap. The Council considers that amendments are required to the wording in order for the policy to be deemed **effective** to deliver cross-boundary strategic objectives.

Comments continued on next page

B3 Extension:

Appended to this representation is this Council's suggested approach put forward in 2018(Gosport Response 11v Appendix 1a and 1b). The Council considers that the Strategic Gap offers significant opportunities for mitigating and adapting to climate change (renewable energy, flood storage), improving informal recreational access to an urban population, and enhancing biodiversity. Since this time a number of Government proposals including the 25 Year Environment Plan and proposals for nitrate mitigation and mandatory biodiversity net gain have been proposed which could be delivered in the Strategic Gap. Given the importance of the Strategic Gap it is recommended that Policy NE9 includes specific reference to the potential for green infrastructure improvements in this area.

Such reference would reflect an announcement by the Leader of Fareham Borough Council included in a recent press release (Gosport Response 11v Appendix 2).

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reference should be made in the Green Infrastructure Policy and justification text to strategic green infrastructure opportunities.

Reference should be made to this Council's proposal that Fareham Borough Council and Gosport Borough Council will work together to develop a joint strategy for the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

This suggested modification would make the whole Local Plan sound as it would set out an effective strategy to improve green infrastructure for the residents of both Fareham and Gosport Borough and would provide a degree of certainty for the long term future of the Strategic Gap. It would maximise potential opportunities arising from Government proposals set out in the 25 Year Environment Plan by enhancing biodiversity and delivering environmental net gain.

B4c Your suggested revised wording of any policy or text:

We would take the opportunity to work with colleagues at Fareham Borough Council for a joint statement on this issue.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ **Yes, I want to take part in a hearing**

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Council is prepared to attend any session regarding the future of the Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL



GOSPORT
Borough Council

Mr Richard Jolley
Director of Planning and Regulation
Fareham Borough Council
Civic Offices,
Civic Way,
Fareham,
Hampshire.
PO16 7AZ

Please ask for:

Debbie Gore

Direct dial:



1st October 2018

By e-mail

Dear Richard

Gosport, Fareham, Lee-on-the-Solent and Stubbington Gap Policy

As mentioned during our recent conversation, a report was presented to Gosport Borough Council's Economic Development Board on 19th September relating to the settlement/strategic gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington.

The Board resolved to continue to support the integrity of the Gap in order to prevent coalescence of settlements and maintain their identity, as well as safeguarding the Gap's function as an effective transport corridor.

It was also resolved that Fareham Borough Council is invited to work with Gosport Borough Council to consider a joint approach for the future of the Gap for a number of reasons including:

- As part of the statutory duty to cooperate;
- To secure the Gap's coherence over the longer term; and
- To investigate options for delivering multi-functional benefits for residents of both Boroughs.

In the light of this I thought it would be useful if we could meet, together with our respective planning policy managers, for initial discussions to explore a common approach and what further work, if any, is required.

I trust you are amenable to such discussions and if so please could you provide a list of possible dates to meet.

If in the meantime if you have any queries on this matter please do not hesitate to contact me.

Yours sincerely

Debbie Gore
Head of Planning and Regeneration Services

AGENDA ITEM NO.

Board/Committee:	Economic Development Board
Date of Meeting:	19 th September 2018
Title:	Gosport, Fareham, Lee-on-the-Solent and Stubbington Gap Policy
Author:	Manager of Planning Policy
Status:	For Decision

PURPOSE

To consider the role of the current settlement/strategic gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington and to support the principle of maintaining the integrity of this Gap.

RECOMMENDATION

That this Council

- Agree the principle of maintaining a settlement/strategic gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington as part of the forthcoming Gosport Borough Local Plan Review.
- Continue to support the necessity of maintaining the integrity of the Gap beyond the Borough boundary in order to prevent the coalescence of settlements and maintain their identity; and safeguard the Gap's function as an effective transport corridor.
- That Fareham Borough Council are invited to work with this Council on a bilateral basis to consider a joint approach for the future of the Gap:
 - as part of the statutory duty to cooperate;
 - to secure its coherence over the longer term; and
 - to investigate options for delivering multi-functional benefits for residents of both Boroughs.
- Refer to the Gap as a 'Strategic Countryside Gap' in the Local Plan Review for reasons set out in Section 2 of this report.

1 **Background**

- 1.1 The current adopted Gosport Borough Local Plan (GBLP) (October 2015) includes a Settlement Gap policy (part 10 of Policy LP3) which aims to retain a sufficient gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington in order to protect the identity of each settlement and ensure proposals do not physically and visually diminish these open areas.

- 1.2 This settlement gap is considered of sub-regional importance and was identified, together with three others, in the PUSH¹ South Hampshire Strategy (Policy 15) (October 2012). The local boundaries, as defined on the Policies Map of the GBLP, were defined in cooperation with Fareham Borough Council (FBC) as part of the production of both current adopted local plans and consequently the gap is included within FBC's current Local Plan (linked to Policy CS22 of Part 1 of the Fareham Local Plan: Core Strategy). A plan showing the current boundary of the gap is shown in Appendix 1. The gap within the Borough includes the Alver Valley, Browndown and playing fields associated with HMS Sultan and Bay House School.
- 1.3 The South Hampshire gaps are tracts of undeveloped land within the sub region which keep settlements separate from each other. The prevention of significant development within these Gaps has been a feature of strategic and local planning documents in South Hampshire for over 35 years.
- 1.4 In 2008 the PUSH Joint Committee adopted a Policy Framework which set out criteria for the designation of Gaps to ensure consistency across South Hampshire. It was recognised that Gaps which cross authority boundaries need a coordinated approach to ensure that their designation and their extent is aligned across the boundary.
- 1.5 The criteria to define the boundaries were included in Policy 15 of the South Hampshire Strategy (Oct 2012) (and therefore relevant to both the current Gosport and Fareham Local Plans). The criteria are as follows:-
- the designation is needed to retain the open nature and/or sense of separation between settlements;
 - the land to be included within the Gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;
 - the Gap boundaries should not preclude the provision being made for the development proposed in this Strategy;
 - the Gap should include no more land than is necessary to prevent the coalescence of settlements having regard to maintaining their physical and visual separation.
- 1.6 The South Hampshire Strategy makes it clear that, *'the purpose of Gaps is to shape settlement patterns and to influence the location of planned development; not to stifle it altogether. So the boundaries of Gaps must be defined in tandem with providing sufficient land to meet development needs.'*
- 1.7 In June 2016 the PUSH authorities agreed the Spatial Position

¹ Partnership for Urban South Hampshire

Statement (SPS) to inform long term decisions about the level and distribution of development in the area to 2034 taking into account requirements to plan for objectively assessed housing needs. The SPS has maintained a policy on Gaps which it recognises are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities.

- 1.8 The SPS only specifically identifies the Meon Valley Gap in Position Statement 1 as it demarks the boundary of the Portsmouth and Southampton Housing Market Areas. The SPS however recognises that in addition to this area, *'Councils should identify in their Local Plans other local strategic countryside gaps of sub-regional importance as appropriate.'* It adds that, *'Given the long term need for development, the number and extent of gaps should only be that needed to achieve their purpose.'*
- 1.9 The justification text states that such gaps should be defined in order to prevent coalescence and protect the identity of distinct settlements and maintaining green infrastructure. They are a mechanism which still allows development to come forward in appropriate sustainable locations by giving communities the confidence to plan positively for growth, whilst ensuring there is room for the necessary complimentary uses such as recreation areas, transport corridors and environmental mitigation.

2 **Terminology**

- 2.1 The gaps designation is known by various terms in South Hampshire documents but importantly they are describing the same land use function. The 2012 South Hampshire Strategy refers to this designation as 'Gaps' in order to keep settlements separate from each other. Consequently the GBLP refers to these gaps as 'Settlement Gaps' whereas the Fareham Local Plan refers to them as Strategic Gaps which was the term formerly used. It is important to note that there is no difference whatsoever in the designation. They both relate to the Gaps designation in the South Hampshire Strategy. The PUSH Spatial Position Statement (June 2016) refers to the Gaps in Position Statement 1 as Strategic Countryside Gaps but also uses the term strategic gaps in the justification text. Similarly this is referring to the same designation.
- 2.2 It is proposed that the Gap policy in the forthcoming Gosport Borough Local Plan Review will be termed 'Strategic Countryside Gaps' to be consistent with PUSH Spatial Position Statement, recognising that this is only a change in terminology and that the role of the gap is unchanged.

3 **Report**

- 3.1 As part of the forthcoming Gosport Borough Local Plan Review which will cover the period to 2036 it will be necessary to review the detailed boundary of the Gap within Gosport Borough. This will be

undertaken at the same time as the review of the urban area boundary (as currently defined in Policy LP3 (point 2) and the Policies Map of the GBLP). However it is clear that the principle of the Gap remains applicable particularly when considering the criteria outlined by the previously agreed PUSH Framework on this issue.

3.2 The key issue however arises from concern regarding Fareham Borough Council's commitment to the Gap given their latest proposal in the Draft Fareham Local Plan (DFLP) (Regulation 18) published in October 2017. As Members will recall FBC has proposed a significant new development allocation of up to 475 dwellings in land currently in the strategic gap to the east of the new Newgate Lane (Newgate Lane East). As part of this allocation it is proposed to remove this land from the strategic gap accordingly. This proposal is commonly referred to as 'HA2.' Appendix 2 shows how this proposal as well as a number of speculative housing developments could significantly be detrimental to the function of the gap both individually and cumulatively.

3.3 In response to the DFLP, this Council resolved (Regulatory Board 6th December 2017) to make a strongly worded objection to the HA2 proposal and the need to defend the gap, which was consequently duly made. Key elements of the Council's case with reference to the Gap are set out in Appendix 3. Numerous other points referring to other issues relating to the proposed housing allocation were also made and can be viewed in the aforementioned Regulatory Board report. These key issues include:

- that the proposal will negate the benefits being provided by the new improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
- the proposal has the potential to significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would potentially increase traffic on residential roads;
- there is insufficient information on supporting infrastructure including education, medical and community facilities.

3.4 The extract in Appendix 3 identifies that this Council has a number of concerns and concludes that whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the character of the gap and will diminish the physical and visual

separation of the settlements.

3.5 The Council considers that FBCs proposals are contrary:

- to the objectives of the long-established sub-regional policy in South Hampshire to protect important gaps between settlements.
- to FBC's own evidence, submitted at its own Local Plan Examination in Public as recently as 2015 which defends the gap at this particular location.
- to the Planning Inspector findings in 2015 who states in his report, *'although the review [of the Strategic Gap] did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'*
- to FBC's own Landscape Assessment (2017) evidence used as part of the DFLP which states *'This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'*
- to its own Sustainability Appraisal which highlights that that Newgate Lane allocation is less sustainably located than other allocations in the DFLP.

3.6 In addition to the HA2 proposed allocation, the Gap is also under further pressure from a speculative development of 1,027 dwellings at Newlands Farm with associated community facilities. The planning application has yet to be determined and is contrary to both the current Fareham Local Plan and the emerging DFLP.

3.7 Also of concern is that a perspective developer is considering further development between Newgate Lane East and the original Newgate Lane citing the fact that as FBC has allocated the HA2 in the draft Local Plan it would release the potential for further development to take place.

3.8 In the light of the above identified pressure it is of paramount importance that Gosport Borough Council seeks to maintain the existing Gap between Gosport, Fareham, Lee-on-the-Solent and

Stubbington. The Council recognises that the development of transport infrastructure within the Gap, such as the Newgate Lane improvements and the proposed Stubbington Bypass, are compatible uses within the Gap as part of the acknowledged transport corridor function of gaps (as identified in the PUSH SPS). The Council considers that significant new residential development along this new infrastructure has the potential to significantly reduce its effectiveness as a key transport route serving the Peninsula.

- 3.9 It is acknowledged that the pressure on the Gap has been caused by the significant housing needs in South Hampshire and the various measures introduced by the Government to increase the rate of house building. This includes the new standardised methodology for calculating housing need and the housing delivery test recently confirmed in the Government's National Planning Policy Framework (NPPF) (July 2018), together with the previous measure of the 'Five Year Housing Supply', which Fareham Borough has not been able to meet.
- 3.10 It is important to recognise that this Gap has been a very established planning strategy for PUSH and its various sub-regional planning documents in order to maintain such important spaces within the wider densely built-up areas of South Hampshire.
- 3.11 Gosport Borough Council strongly supports Position Statement S1 on Strategic Countryside Gaps in the PUSH Spatial Position Statement (June 2016) and considers that the principle of the Gap should be maintained in the forthcoming Local Plan Review and it should seek to protect the integrity of the wider gap beyond the Borough boundary. Consequently it will continue to make representations to FBC in relation to the HA2 proposal as well as making comment on planning applications which have a detrimental impact on the sub-regional gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington and its ability to function as an effective transport corridor for the Peninsula.
- 3.12 In the light of this and as part of both Councils' statutory duty to cooperate, as well as the new requirement to produce a 'statement of common ground' (introduced by the NPPF), it is considered appropriate to invite Fareham Borough Council to consider establishing a joint approach to the Gap which protects its key functions as established by PUSH. This could potentially lead to a joint strategy for the gap which could assist in implementing multi-functional benefits for the residents of both Boroughs.

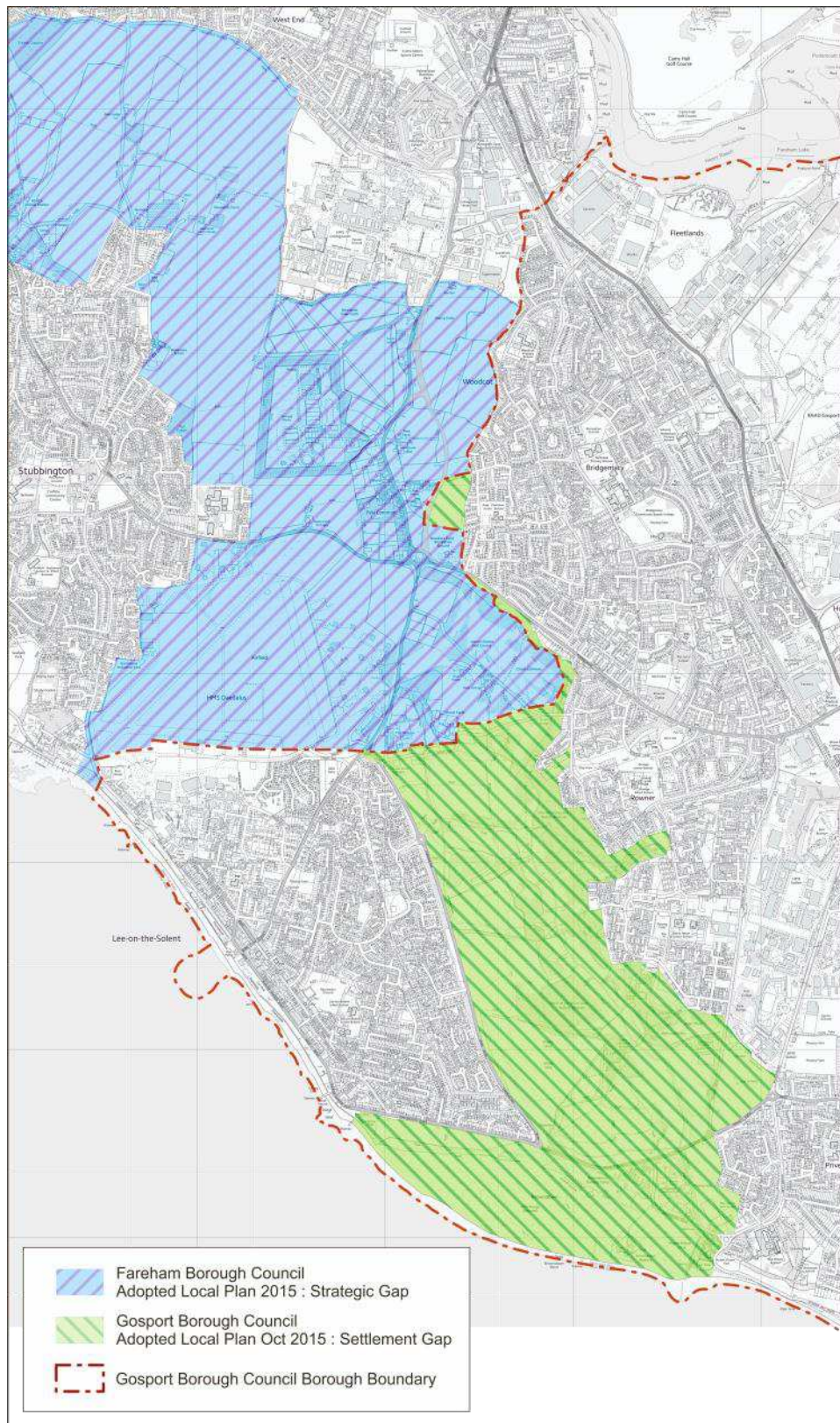
4 Risk Assessment

- 4.1 It is considered necessary to maintain a policy position in the forthcoming Local Plan to protect the Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington to prevent

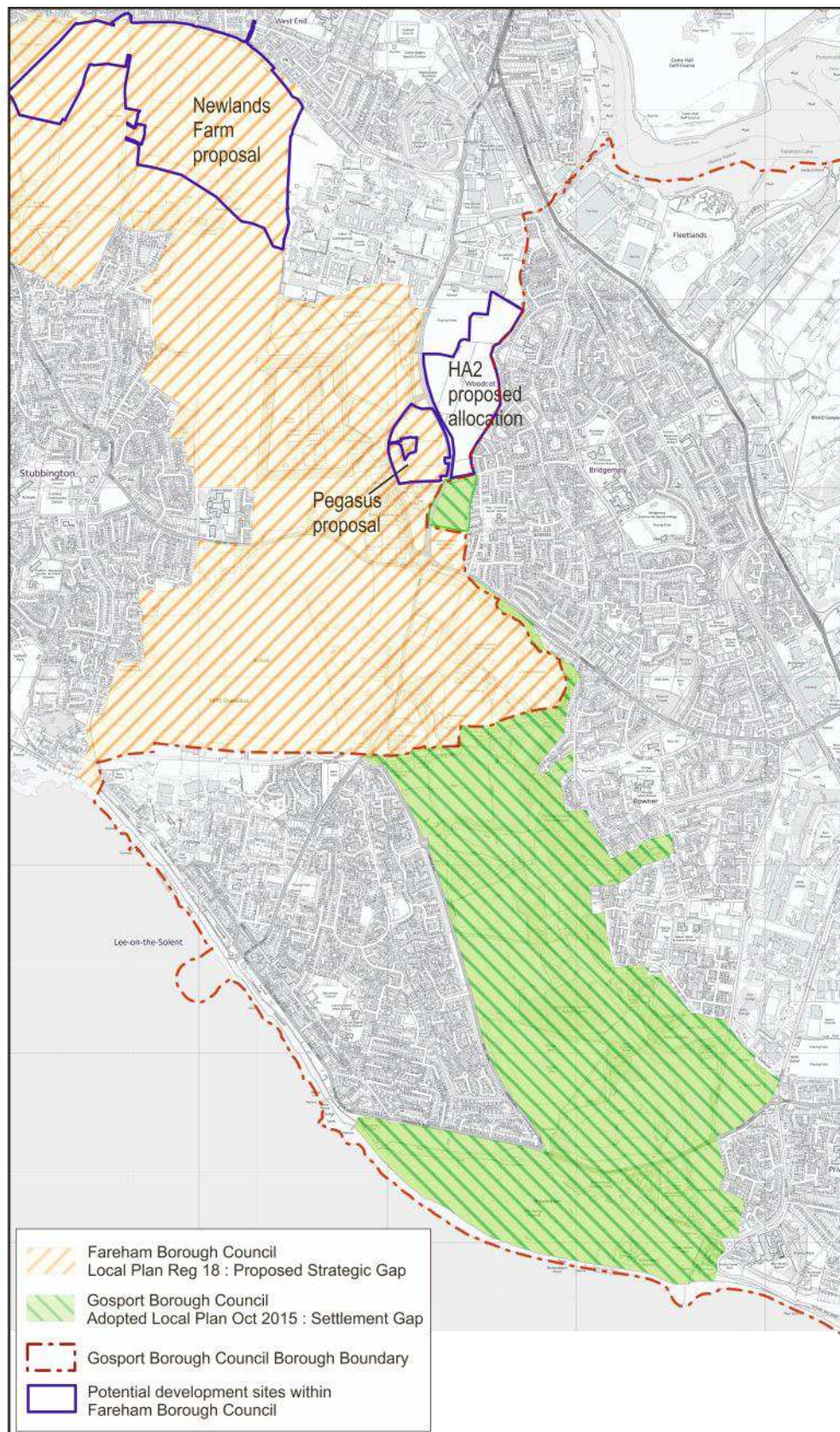
coalescence and maintain the identity of each settlement. It is important that Gosport Borough Council defends the integrity of the gap and makes appropriate representations to Fareham Borough Council where appropriate. Failure to do so could have a detrimental impact on the potential for the gap to function as an effective transport corridor, and deliver environmental, recreational and landscape benefits.

Financial comments:	Services	None
Legal comments:	Services	None
Equality and Diversity		An Equality and Diversity Assessment on the Settlement Gap Policy in the GBLP was undertaken as part of the Examination in Public process and is available to view. A similar assessment will be undertaken as part of the forthcoming Local Plan Review.
Council Plan:		Maintaining the gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington will assist in developing the economy by maintaining, and enabling opportunities to enhance the transport corridors through the gap; whilst the development of such areas for residential would place significant pressure on the transport infrastructure and would significantly undermine the effectiveness of recent and proposed improvements. Maintaining the gap may also offer opportunities to enhance the environment.
Risk Assessment:		See Section 4
Background papers:		None
Appendices		<p>Appendix 1: The current Settlement/Strategic Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington</p> <p>Appendix 2: Potential for the Strategic Gap to be reduced by the HA2 proposal and current speculative housing developments</p> <p>Appendix 3: Extract from Regulatory Board (6th December 2017) on Draft Fareham Local Plan (Reg 18) relating specifically to the Strategic Gap in relation to the HA2 allocation.</p>
Report author/ Officer:	Lead	Jayson Grygiel, Manager of Planning Policy

Appendix 1:
The current Settlement/Strategic Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington



Appendix 2: Potential for the Strategic Gap to be reduced by the HA2 proposal and current speculative housing developments



Appendix 3: Extract from Regulatory Board (6th December 2017) on Draft Fareham Local Plan (Reg 18) relating specifically to the Strategic Gap in relation to the HA2 allocation.

Strategic Gap

- 5.6 In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between 'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent', which is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.
- 5.7 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- 5.8 FBC's current Policy CS22 states that 'development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements'. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.
- 5.9 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.
- 5.10 It is considered that this remains relevant in the case of the Newgate Lane area. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,
'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'

- 5.11 The latest DFLP also includes a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identifies a Strategic Gap between 'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent'. It states, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements'*. The justification text acknowledges that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly states in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.'* This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.
- 5.12 The proposed removal of this land from the Strategic Gap also appears to be at odds with FBC's own supporting evidence. The Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the 'Woodcot area' which includes the land covered by the proposed Newgate Lane allocation. It concludes,
'This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'
- 5.13 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area should remain an integral part of the Strategic Gap.
- 5.14 Whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.

Press Release

22 October 2020

Councils seek nature-based solution to protect a strategic gap

Two south Hampshire councils are joining forces to seek benefits for their boroughs from two pots of Government money aimed at increasing wetlands, woodlands and meadows in the Solent area. Cllr Seán Woodward, Leader of Fareham Borough Council and Cllr Stephen Philpott, who is in charge of Economic Development at Gosport, want to see more land between the two towns “rewilded”.

This shared vision follows last month’s announcement by the Government to invest £3.9million to set up an online ‘nitrate-trading’ auction platform. They are also considering a loan to the Hampshire and Isle of Wight Wildlife Trust for further land purchase in the Solent region for ‘rewilding’. Both initiatives would provide additional habitat rich areas for wildlife whilst unlocking much needed homes, with the backing of Natural England.

Three weeks ago, the Prime Minister, Boris Johnson, joined 65 world leaders in a pledge to reverse losses of wildlife habitats. In the UK that will mean an additional 400,000 hectares of woodland, wetland and meadow by the end of the decade.


Cllr Woodward said: “What we would like to see is the entire Strategic Gap that lies between Fareham and Gosport, and between Fareham and Stubbington rewilded to provide nitrate mitigation and preserve wildlife and this scheme offers us the opportunity to achieve that. I have been an unwavering supporter of preserving our precious Strategic Gaps and indeed seeking their designation as Green Belt. The recent announcement by Government that Fareham is likely to see a reduction in the number of houses it is required to plan for means we are now in a position to make an approach to our partners to secure land in the Fareham-Stubbington Strategic Gap for rewilding”.

Although the Fareham-Stubbington Strategic Gap is mainly in Fareham there would also be a significant environmental benefit for Gosport.

Cllr Philpott said: “This is a great example of local councils working together for the benefit of their residents. Seán and I have today written to the Wildlife Trust to secure their backing for our idea to see a significant environment gain in our immediate neighbourhood. We will also work with other partners, such as the Solent Local Enterprise Partnership and Natural England, to seek maximum benefit from other similar projects for our communities.”

ENDS

Respondent details:

Title:	Mrs
First Name:	Iris
Last Name:	Grist
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: DS1 - Development in the Countryside

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

We were promised that all houses in the borough would have a paper copy of the plan delivered. This has not happened. No one in our road has had one delivered, and I cannot find anyone in the local area who has had one delivered either, except for one road who complained about not getting any, and then they were delivered. If you do not have a computer, use one, or have access to one, then you are put at a disadvantage to find out what is going on. A few weeks ago, the leaflet for Christmas bin collections was delivered by hand to all houses, so the council can do this delivery, and that would have been an ideal time to deliver the new plan information at the same time. I believe that FBC is deliberately trying to keep people in the dark on this, to try and cut down on the number of objections which it could receive about the plan.

Today is the 18th December 2020, which is the last day for comments. No one in this area has yet had a paper copy of the plan delivered, except for the one road which requested it. How are the majority of the residents supposed to know what is proposed? Is the council trying to keep this quiet? Also this week the government has revised it's housing allocation plans, yet again. Is the number of proposed houses, still the same, or should FBC start again with a different number of houses to reflect the changes?

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Not to talk about not building in the countryside, and than to propose to do just that.

Check facts

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Truth

Correct number of houses

Your suggested revised wording of any policy or text:

FBC says that there are no housing developments proposed for Portsdown Hill. No. 3.9 Yes, there is site HA4, land to the east of Down end Road. It cannot have it both ways. On the map, figure 3.1 it clearly shows that this site is in the countryside. It says that Portsdown Hill is an area of special landscape quality, so should not be built on. This area has already been turned down three times by the planning committee of FBC on the grounds of unsafe access into the site across Down end Bridge. Latest application being P/20/0912/OA. Section 3.29 says that we need to protect the countryside from large scale development. 350 houses is large scale. Again FBC cannot have it both ways. Section 3.52 says that chalklands are an important component in the landscape of the north east of the borough around the southerner scarp face of Portsdown Hill This is exactly where site HA4 is.

numbers

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

No, I don't want to take part in a hearing session

2) Paragraph: 3.9

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

In general terms this talks about development sites which should maximise development within the urban area, and away from the wilder countryside, respect the valued landscapes and spaces which contribute to settlement definition. No 3.9 says that there no development allocations in these areas, which includes Portsdown Hill. It goes on to say that planning should recognise the beauty of the countryside, and that Portsdown Hill is of special landscape quality. Land to the East of Down End Road, site HA4 is proposed for 350 houses, and this is definitely on Portsdown Hill. This site has already been turned down by FBC planning committee three times now, on the grounds of lack of safety of pedestrian and traffic over Down End Road Bridge. FBC is trying to say that site HA4 is not on Portsdown Hill, yet it is. Trying to have it both ways to suit their purposes. Latest application to be turned down was P/20/0912/OA

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Give everyone a paper copy of the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Not to contradict facts

Your suggested revised wording of any policy or text:

Not to contradict facts

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Paragraph: 3.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Figure 3.1 quite clearly shows site HA4 to be in the countryside, yet the report says that there are no development allocations in these areas. Site HA4 is on the slopes of Porstdown Hill, and outside of the urban area and settlement boundaries. Council is trying to have it both ways, just to get their umbers up. The railway line is a very clear boundary.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Give everyone a paper copy

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Tell the truth about where the countryside starts

Your suggested revised wording of any policy or text:

Most of what is written about Portsdown Hill is misleading, as it talks a lot about the northern side, which is completely irrelevant, as most of that is in Winchester's area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Massie, Neil <[REDACTED]>
Sent: 21 December 2020 09:27
To: Planning Policy
Cc: Planning Consultations
Subject: Hampshire County Council Early Years Response
Attachments: Fareham Borough Council Local Plan Regulation 19 Proposed Submission Version - HCC Response 18 December 2020.pdf; Early Years Places Planning Summary FAREHAM LOCAL PLAN 2037.pdf

Dear Sir / Madam,

Please find attached an additional guidance note provided by Hampshire County Council Children's Services on Early Years places in relation to the Fareham Local Plan and the proposed housing allocations.

Thank you

Regards

Neil Massie BSc (Hons) MSc
Principal Planning Policy Officer



Strategic Planning
First Floor, Ell Court West,
The Castle, Winchester SO23 8UD



Hampshire Services offers a range of professional consultancy services to partner organisations.

For more information go to www.hants.gov.uk/sharedexpertise

From: Massie, Neil
Sent: 18 December 2020 11:35
To: planningpolicy@fareham.gov.uk
Cc: Planning Consultations <planningconsultations@hants.gov.uk>
Subject: Fareham BC Regulation 19 Local Plan Consultation - Hampshire County Council Response

Dear Sir / Madam,

Please find attached the Hampshire County Council regulatory response to this consultation.

Because this is a structured corporate response it has not been submitted on the FBC online response page.

Thank you

Regards

Neil

Neil Massie BSc (Hons) MSc
Principal Planning Policy Officer



Strategic Planning

First Floor, Ell Court West,
The Castle, Winchester SO23 8UD



Hampshire
County Council



Hampshire
Services

ENVIRONMENT AND PLANNING

Hampshire Services offers a range of professional consultancy services to partner organisations.

For more information go to www.hants.gov.uk/sharedexpertise

Fareham Borough Council Local Plan (Reg.19) Proposed Submission Version Consultation

Hampshire County Council Response – 18 December 2020

Hampshire County Council does consider the local plan to be sound and legally compliant. The County Council welcomes the opportunity to respond on this consultation and sets out its comments firstly on the Transport Assessment and then on specific local plan policies in its capacity as the local highways authority, local education authority and in its role as an adult services provider with a focus on specialist care.

The County Council then sets out its comments on specific site allocations in its capacity as the local highway authority, local minerals and waste planning authority and also as the local education authority with responsibility for school place planning.

Policy HA2: Newgate Lane South (removal as a housing allocation)

Hampshire County Council is the Local Highway Authority (LHA) for all roads in Hampshire except for motorways and trunk roads and the LHA response is concerned with the potential highway and transportation impacts of the land use proposals set out by the borough council on the local road network. HCC's primary concern as highway authority is the efficient use, management and maintenance of the local highway network. Ensuring that all new development mitigates its impact on the Hampshire network is the function of the highway authority.

The LHA submitted comments in December 2017 and February 2020 in response to the draft local plan regulation 18 consultations. As part of both responses the LHA submitted an objection to policy HA2 (Newgate Lane South). This objection is not resubmitted due to the removal of policy HA2 as an allocated housing site from the revised development strategy in the Publication Plan.

Transport Assessment

At the time of the previous draft local plan consultation in January 2020 the evidence base did not include a completed Transport Assessment (TA) to replace the interim TA published in support of the 2017 draft local plan consultation therefore the local highway authority submitted a holding objection. The TA has now been finalised and forms part of the Publication Plan evidence base.

The LHA supports the methodology used by FBC in preparing a borough-wide TA and the use of the strategic model known as the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the Borough.

The Fareham Local Plan - SRTM modelling report (2020) sets out the Baseline, the Do minimum (with local plan development) scenario and the Do Something (with mitigation) model runs and forms part of the transport evidence base. As part of the strategic transport modelling the LHA understands that a total of 2,150 dwellings was attributed to the proposed Strategic Growth Areas (SGAs) and included in the Do minimum scenario. This means that the strategic modelling was carried out using a higher housing number than is currently proposed in the Publication Plan. The LHA recognises that the strategic modelling with the higher housing number represents a worst-case scenario and that the limitations of the SRTM do not allow for localised impacts at junctions to be attributed to specific development sites. Consequently, it is not possible for the SRTM to isolate the transport impacts of the SGAs on the highway network. Therefore, the LHA accepts the outputs from the strategic modelling report and has not requested an additional model run of the SRTM to reflect the removal of the two SGAs and subsequent lower housing number.

The SRTM modelling report indicates that the incremental impact of all the site allocations including the SGAs is forecast to affect links and junctions across the highway network and particularly along the A27 corridor through Fareham borough. The future resilience of the A27 corridor is a concern for the LHA which is why the LHA is undertaking a transport study for the A27 corridor which the County Council will seek to adopt as future strategy. The strategy will seek to incorporate a multi modal approach that facilitates a modal shift away from private car use. Future transport assessments of development sites along the A27 corridor should take this into account and have regard to the emerging transport strategy.

A key aspect of the A27 corridor strategy will be the application of the 'Link and Place' approach to street planning and design. This approach recognises a street functions as both a link (that is movement by all modes of transport including pedestrians) and a place (destination in itself) and will help determine policy priorities between competing users with a greater emphasis on the function of places. This 'link and place' approach is being developed as a Hampshire County Council policy which will be fully imbedded in the next Local Transport Plan for Hampshire (Local Transport Plan 4).

The TA assessed the cumulative impacts of the site allocations and demonstrates that the significant transport impacts of the local plan development on the highway network can be mitigated through proposed highway interventions. The TA specifically highlights the junction at Parkway/Leafy lane which is north of the M27 junction 9 and serves the Whiteley business estate in the adjoining district of Winchester City Council. The Parkway/Leafy Lane junction is predicted to be significantly impacted by local plan development traffic (with long queues along Leafy Lane) and meets the criteria for requiring mitigation.

However, this junction does not warrant a Do Something mitigation scheme for increased junction capacity. This is because the Leafy Lane arm of the junction leads to a residential area with a 20mph zone reinforced by vertical speed reduction measures. The policy approach by the LHA is to reduce rat-running along Leafy Lane between

Fareham and Whiteley. Therefore, an alternative highway scheme which strengthens the current situation of suppressing flows along Leafy Lane should be the mitigation scheme to be taken forward. The LHA will need further discussions with both Fareham Borough Council and Winchester City Council to establish the form of any mitigation scheme if it is required.

The Do Something modelling for the TA proposed five mitigation schemes for increased junction capacity and modelled only the highway impacts of increased motorised vehicle traffic. There are other solutions for mitigating the transport impacts from local plan development which are more in line with the emerging policy agenda on decarbonising transport from Government and Hampshire County Council. These mitigation options would generally follow a sequential approach to assess their impact on the local road network and the role they can play in traffic reduction and reducing transport emissions starting with measures to avoid the need to travel, active travel measures, public transport (SE Hampshire rapid transit) and finally localised junction improvements. This wider and sequential approach to mitigation will need to be applied to all site-specific transport assessments.

Development Strategy

The LHA acknowledges that the Publication Plan proposes a lower housing number than in the previous draft local plans. This lower housing number is in response to a lower level of housing growth proposed by Government in its consultation in August 2020 on a new standard methodology for calculating the annual housing need. The LHA recognises that FBC need to await the outcome of the Government's consultation before the Publication Plan with the lower housing number can proceed to adoption in line with the FBC's revised Local Development Scheme (September 2020).

The consequence of a reduced housing number is a change to the development strategy and the removal of several housing sites. The LHA supports the removal of housing site HA2 Newgate Lane South. The LHA submitted an objection to policy HA2 in the previous draft local plan consultations.

The LHA also supports the removal of the Strategic Growth Area policy from the Publication Plan. The South of Fareham and North of Fareham Strategic Growth Areas were included in the draft local plan consultations and the LHA submitted a holding objection.

Climate Change

Fareham Borough Council as Local Planning Authority has a legal duty to help meet the requirements of the Climate Change Act 2008. The LHA wishes to be reassured that the borough Council has satisfied itself that the Publication Plan goes far enough in supporting the Government and Hampshire County Council policies on climate change that have emerged during the local plan preparation process. This is in view of the Hampshire County Council's recently adopted climate change strategy and targets to be

carbon neutral by 2050 and resilient to a two degree rise in temperature. For Hampshire to meet these targets, which are in line with Government legal requirements, land-use planning and transport policies at the local district level need to play a strong role and are likely to be most effective at the plan making stage.

The LHA acknowledges the transport evidence submitted in the Strategic Transport Assessment which shows how the traffic impact of the local plan development can be mitigated in traffic and transport terms. The LHA wishes to see demonstrated how the local plan proposals, in relation to transport and how we travel, will contribute to the longer-term goal of achieving carbon neutrality and building resilient networks and systems.

Strategic Policy CC1: Climate Change

The LHA supports the amended climate change chapter and strategic policy CC1 however the supporting text needs more detail with reference to the County Council's adopted Climate Change Strategy (2020) and targets including the resilience of the highway network.

Policy NE8: Air Quality

The local plan correctly identifies road transport emissions as the main source of air pollution which is relevant to the County Council's responsibilities as both highway and public health authority. The LHA supports the local plan commitments to reduce, minimise and mitigate road transport emissions and their impact. However, the Air Quality Policy NE8 needs to be more specific and should be amended to include the policy text 'development should deliver sustainable transport (public transport, walking and cycling) as part of improving air quality'.

Policy TIN1 Sustainable Transport

Given the connection between transport, local plan allocations, air quality and health, there is a lack of commentary or cross reference on air quality management within the Transport Chapter. For example, the supportive text needs to make clear how the transport policies (such as Sustainable Transport TIN1) contribute to both the climate change objectives of reducing CO2 emissions and to the air quality objectives of reducing air pollution.

The LHA recommend amending policy TIN1 on Sustainable Transport to make direct reference to the role of sustainable transport in improving air quality. The supporting policy text also needs to refer to the Air Quality Management Areas / Clean Air Zone designation (on sections of the A27 and A32) and the Air Quality Action Plans in place due to concerns over nitrogen dioxide levels caused by road traffic. Likewise, the Air Quality section needs to refer to the transport chapter and policies and the role they play in mitigating the transport impacts on air quality.

The Transport chapter needs to refer to the Strategic Transport Assessment and the impacts of the local plan traffic on air quality in particular air pollution from the M27, the A32 and A27. This should be cross-referenced with the air quality work carried out as part of the AQMAs and the local plan Sustainability Appraisal. The LHA supports transport mitigation measures of sustainable and active travel modes as an alternative to making private vehicle trips which help overall to reduce emissions harmful to human health and the environment. The LHA would not support any transport mitigation measures which threatened to undermine the success of the current Air Quality Management Areas.

The Transport chapter needs to strengthen the commitment to deliver high quality walking and cycling facilities with reference to the Government's new cycle infrastructure design guidance in Local Transport Note 1/20. Reference to cycle infrastructure design should also be included in the Design chapter.

To contribute to reducing car use, opportunities for enhancing and encouraging active travel to and from school should be encouraged and implemented working closely with Hampshire County Council Children's Services and Highways Departments. The County Council will require the provision of safe walking and cycle routes to schools and existing routes to be enhanced where necessary to improve walking and cycling numbers. Contributions from developers will be sought where necessary including for the production and monitoring of school travel plans (STP's).

PolicyTIN3: Safeguarded Routes

The LHA supports the new policy TIN3 Safeguarded routes in relation to delivering bus rapid transit in Fareham and Portchester. However, the supporting text should refer to the future extensions of the SEHRT network to the west of Fareham towards Segensworth, Swanwick Station, Whiteley and the North Whiteley major development area and to serve the Solent Enterprise Zone at Daedalus and adjacent coastal settlements.

Strategic Policy R4 Community and Leisure Facilities

Hampshire County Council Children's Services consider that it is important that the impact of additional housing is assessed and where necessary developer contributions are provided to provide additional childcare places either through on-site facilities or the expansion of nearby provision. The impact will be assessed on a case-by-case basis.

The County Council also provides an Early Years guidance note on this issue for the Borough Council to consider in their plan making in relation to the future need and housing allocations.

Strategic Priority 8

Hampshire County Council Adult Services welcome the reference to affordable housing and the need to address the specific needs of different groups in the community, including the elderly and people with disabilities. However, it is recommended that reference is made to the need to meet a range of housing needs, including those in need of affordable housing and those in need of specialist housing including the elderly and people with disabilities in Strategic Policy H1: Housing Provision.

Consideration should also be given to whether opportunities are available to encourage specialist housing provision in specific site allocations.

Policy HP 5: Affordable Housing

The County Council recommend that Policy HP5 or the supporting text should encourage the provision of housing to meet a range of needs, including specialist housing to meet older persons' needs (such as extra care housing) and those with disabilities.

Policy HP7: Adaptable and Accessible Dwellings

The County Council notes that the Specialist Housing Topic Paper includes reference to the low cost of providing homes to above base accessibility standards. Although there is a correlation between age and mobility, people of all ages may have some mobility impairment, either permanently or temporarily.

The proposed percentages of housing the policy requires to be built to higher accessibility standards is modest and given the rate at which the stock is added to each year it will be a very long time before a significant supply of accessible housing is available in the Borough. With such modest levels of provision, the likelihood of a person who develops mobility impairment will find themselves in a home that can meet their needs is low. Adopting a requirement for a larger proportion of the stock to be built to Cat2 standards in particular would better meet individuals' changing needs and support the creation of sustainable communities by reducing the need to move to find suitable accommodation.

Policy HP 8: Older Persons and Specialist Housing Provision

The inclusion of an enabling policy is welcomed by the County Council; however it is recommended there is specific mention of specialist provision of affordable housing, including extra care housing and housing for those with disabilities. It is noted that specific housing allocations are made only in respect of sheltered accommodation (Policies HA42 / 43 /44). The County Council consider that these sites may also be suitable for other forms of specialist housing, including extra care housing and housing for those with disabilities. It is recommended those policies are amended to reflect this.

The County Council supports the opportunity for exception type development in specific circumstances in this policy and Policy HP6.

Housing Site Allocations

The County Council has considered the housing allocations in its capacity as the local highways authority, local education authority and local minerals and waste planning authority and provides the following commentary.

An initial assessment of the impact on school place planning has been considered based on the level of housing identified, and details are highlighted below for specific sites where there will be an impact on the supply of local school places at primary, secondary and education for pupils with Special Educational Needs and Disabilities (SEND).

The County Council as the local minerals and waste planning authority is pleased to see that some of the comments regarding mineral and waste safeguarding, from the Regulation 18 consultation, have been considered and included within the Regulation 19 proposed submission document. Within the County Council's Regulation 18 response a list of sites that were deemed to require a Mineral Resource Assessment as part of any potential application was provided. It is noted that all the allocated housing sites that the County Council made such comments on have been removed from the Proposed Submission Document as being no longer available or no longer suitable.

Housing Allocation Policy HA1 – North and south of Greenaway Lane – 824 dwellings

The development of 824 dwellings will create additional pressure for school places locally at primary, secondary and special schools. It is welcomed that the need for developer contributions has been identified and they will be sought to provide additional educational infrastructure where required. Pedestrian and cycle paths should be provided to local schools and existing routes enhanced where necessary to promote active travel to and from schools.

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council's data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement j.

Housing Allocation Policy HA3 – Southampton Road – 384 dwellings

The identification of the need for developer contributions for education and ensuring safe walking/cycling routes to local schools are provided, is welcomed.

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council's data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement k.

Housing Allocation Policy HA4 – Downend Road East, Portchester – 350 dwellings

It is welcomed that the need for developer contributions has been identified and they will be sought to provide additional educational infrastructure where required. Pedestrian and cycle paths should be provided to local schools and existing routes enhanced where necessary to promote active travel to and from schools.

Whilst the County Council welcome the inclusion of site-specific requirement j, that the site will require a Minerals Assessment prior to any development. The County Council would also like to bring to the Borough Council's attention that this allocated housing site sits within the safeguarded buffer zone of Warren Farm and Down End Quarry, a safeguarded waste site operated by Veolia Environmental Services (UK) Plc.

The safeguarded buffer zone is informed by the safeguarded sites list as defined through 'Policy 26: Safeguarding - waste infrastructure' of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). The purpose of this policy is to protect current and potential waste sites from pressures to be replaced by other forms of development, including through 'encroachment' where nearby land-uses impact their ability to continue operating.

It is often the case that appropriate buffers and mitigation measures can make potential nearby development compatible. Any mitigation measures would need to be undertaken by the proposed non-minerals or waste development (i.e. the allocated housing development) and reduce potential impacts to and from the safeguarded site to levels that would ensure the safeguarded site could continue its intended waste use.

Usually, the mitigation measures would need to focus on impacts such as noise, dust, visual impact, odour and traffic movements. They can take a variety of forms, including landscape design, tree planting, barriers, building design and orientation and use of different building materials.

The appropriate mitigation measures are best informed through direct discussions with the operator of the safeguarded site as they will be most be aware of operational requirements. However, the County Council is also available for further discussions, as well as facilitation, if required.

With regard to the above site, the County Council would therefore request further wording be added to the site-specific requirements of allocated housing site HA4 as set out below:

“the provision of evidence that the safeguarded site has been considered within any forthcoming planning application, how operator comments have been taken into account and what impacts these comments have had on the proposed development design. Details of any mitigation measures chosen as a result of the analysis should also be included with an application for the site”.

In the unlikely event that it is not possible to agree appropriate mitigation measures, the County Council would seek evidence that the waste management capacity can be relocated or provided elsewhere and delivered.

Housing Allocation Policy HA9 - Heath Road

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council’s data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement g.

Policy HA2: Newgate Lane South

The County Council as local highway authority supports the removal of policy HA2 Newgate Lane South.

Strategic Growth Area

The County Council as local highway authority supports the removal of the Strategic Growth Area policy.

Employment Allocations

The County Council has considered the employment site allocations in its capacity as local minerals and waste planning authority and provides the following commentary.

Policy E2 - Faraday Business Park

Whilst a number of the allocated housing sites have had site-specific requirements added to them for Minerals Assessments, allocated employment site E2 - Faraday Business Park has not had any added. In line with the County Council’s Regulation 18 response to the local plan consultation, the County Council again request that a site-specific requirement be added to this allocated site policy so that any forthcoming planning application would need to be accompanied by a Minerals Resource

Assessment. The County Council recommend adding the following site-specific wording: The site is within a Minerals Consultation Area. Minerals extraction may be appropriate, where environmentally suitable, subject to confirmation of the scale and quality of the resource.

The County Council would like to take this opportunity to reiterate that any development or significant redevelopments of land may impact mineral resources. As minerals can only be worked where they are found, it is important that viable mineral resources are 'safeguarded' (protected) from needless sterilisation by other development to help to secure a long-term future supply of minerals. Mineral resources are necessary for a vast array of construction activities and their availability is a prerequisite for any housing development. As such, the NPPF requires planning authorities to define Minerals Safeguarding Areas and adopt policies so that, 1) known locations of mineral resources of local and national importance are not needlessly sterilised by non-mineral development, 2) if it is necessary for non-mineral development to take place, the prior extraction of minerals, where practicable and environmentally feasible, is encouraged.

Early Years requirements in major new developments – a summary

This document provides summary guidance for Hampshire County Council and other agencies in determining a requirement for early years and childcare places to support new housing developments and to inform local planners.

This document augments the extant guidance entitled 'Early Years requirements in major new developments' where detailed estimates of place requirements, take up of early education entitlements for government funded hours, and parental demand are provided. This document is a guide to supply and demand in localised areas, and specifically addresses the Early Years requirements for the area of:

Fareham Borough

In looking at the demand for childcare in an area the Services for Young Children (SfYC) team typically look at the ward and adjoining areas Small Area Population Forecast (SAPF) data and assess it against the known supply of places. Childcare places need to be monitored regularly as the demand for childcare is directly and indirectly influenced by national and local policies. This childcare sufficiency work is carried out by the SFYC team and it is requested that prior to any development we are consulted and are able to share our up to date knowledge of the childcare need in the area.

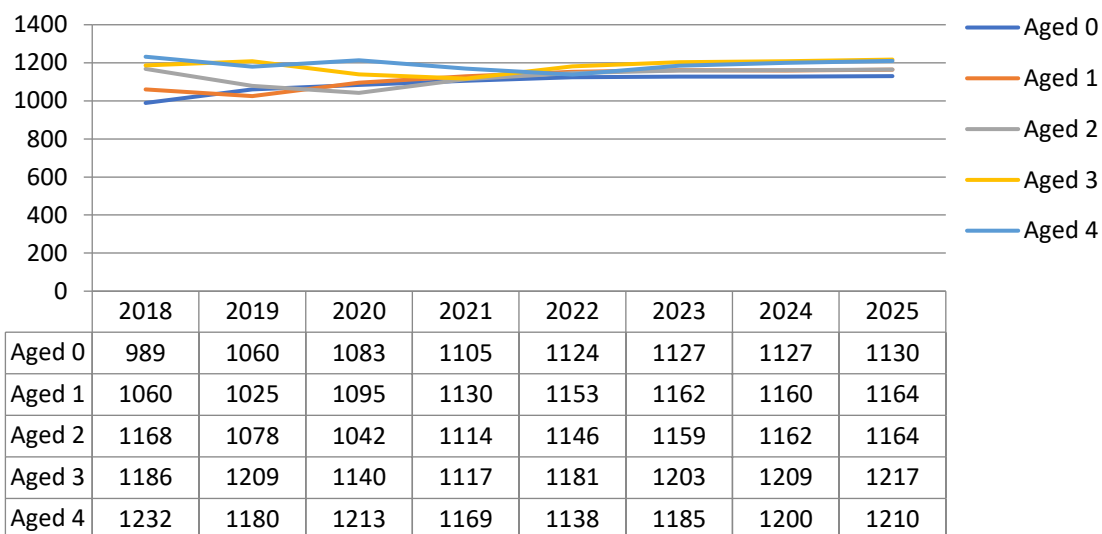
SFYC monitors childcare need for all early year's age cohorts. Early Years Education (EYE) is a statutory offer which is available universally to all three- and four-year olds from the term after their third birthday. For two-year olds, the offer is limited to children of families who meet low income criteria. There is no statutory EYE offer for children aged nought and one year old, but the local authority has a statutory duty under the Childcare Act 2006 to ensure working parents of children aged nought to five can access suitable childcare to meet their needs. This duty extends to children up to twelve years old for Out of School Care.

The overall Fareham area child population aged 0 and 4 years old dipped in 2019 by 83 but is projected to grow by a net 250 between 2018 and 2025 – 0.45% on 2018. The high-level trend projection to 2025 is shown below (Fig.1).

Significant growth in Fareham North ward is anticipated due to the impact of the Welbourne development. Most other ward areas are projected to see either a much slower increase or slight decrease in child numbers, with the overall picture apart from Fareham North showing a broadly static position.

Fig. 1

Fareham area population trend forecast 2018-2025



1. Demand for places:

The starting point is to calculate the number of children in each age group expected from the SAPF data. It must be noted that the SAPF is a modelled population forecast. It also does not take into account the fact that parents don't always take up their childcare places in the same district in which they live.

We know from market data that for each age cohort the percent of children requiring childcare in an early setting is typically:

Aged 0 – 1 yr old	17%
Aged 2 yr old	70%
Aged 3 yr old	99%
Aged 4 yr old	66% (It is assumed that 34% of this age cohort is typically at school)

Early Years Education (EYE) is a statutory offer which is available universally to all 3- and 4-year olds. For two-year olds, the offer is limited to children of families who meet low income criteria. In Hampshire, children can start their free entitlement in the term after their second/third and fourth birthday and can receive a maximum of 570 hours per child's eligibility year. From 2017 the Government increased the offer to 1140 hours for working parents; publicly known as the "30 hours offer".

EYE hours are not limited to the school academic year, offering parents the flexibility to take up their hours across the number of weeks that the provision is open. The demand for three-year-old places is high and trend data in Hampshire indicates that in the region of 90-95% of the three-year-old population take up this entitlement. It is, therefore, expected that there will be continued high demand from this age group within any new housing development.

The demand for four-year-old places, prior to their starting school, is also high. However, due to four-year olds taking up their school place, often in the September after their fourth birthday, the demand within the pre-school and nursery sector is in the region of 32-36% of the four-year-old population.

The demand for two-year olds continues to grow for families who meet certain low income level criteria outlined in section 2 below.

2. Low income families

Where housing developments include a significant level of social housing, shared ownership schemes and/or dwellings that would attract low income families, developers and planners should consider accessibility to affordable early years education and childcare.

Developers and planners should be aware that, since September 2014, the provision of free early years education to eligible 2-year olds is a statutory offer. The offer provides the same choices for parents as the free early years' education entitlement for 3- and 4-year olds. The exception is that the eligibility is primarily based on income assessment.

3. Space requirements and regulations

The space required to fulfil these requirements is stipulated within the [Statutory Early Years Foundation Stage](#) ¹

Section 3.57 sets out premises requirements and states, the premises and equipment must be organised in a way that meets the needs of children. In registered provision, providers must meet the following indoor space requirements:

- Children under two years: 3.5 m² per child.
- Two-year olds: 2.5 m² per child.
- Children aged three to five years: 2.3 m² per child.

These calculations should be based on the net or useable areas of the rooms used by the children, not including storage areas, thoroughfares, dedicated staff areas, cloakrooms, utility rooms, kitchens and toilets.

All early years and childcare operators must register with Ofsted as the regulatory body. Ofsted will inspect an organisation's ability to meet expected standards covered within the Early Years Foundation Stage. The Early Years Foundation Stage also contains expected minimum requirements for the suitability of premises which can be found within the same statutory framework document (accessed through the link on page 3). It is expected that all early years and childcare providers are able to meet requirements to deliver the free early years entitlement at the highest quality and Hampshire providers are expected to achieve and maintain "good" and "outstanding" inspection results.

¹ Statutory Early Years Foundation Stage 2014

4. What developers should provide

Developers should consider 80 early years places for every 1,000 houses and that these places are offered through a mix of facilities where possible. The childcare planning should allow for flexible hours of opening and covering at least 7am to 7pm for full day care.

For 1,000 houses, it is anticipated that one full day provision of 50+ places, together with an additional 30 places from shared community premises, would meet the needs of this size of development.

Where developments provide a high number of social housing dwellings, it is considered there will be the potential for greater demand for affordable childcare and access for two-year-old funded provision. It is likely that this childcare will be required to support employment activities and, therefore, any provision to support lower income families should have regard to the flexibility of opening and closing times of childcare to meet the employment or return to learning requirements of parents and carers.

The location of the childcare provision is parental choice, some choose for their childcare to be located near to their home address and some choose childcare close to their work- place.

The childcare market has also seen parents preferring provision that is close to, or on the site of, infant or primary schools where the school site is large enough to accommodate the provision.

5. Timing of the early years and childcare development

There must be early consideration of the allocation of the sites and/or premises for early years and childcare. It is recommended that such provision is considered for development and occupation at the same time as that for primary schools. This is especially important within developments that have little or no accessible early years and childcare provision adjacent to the new housing development.

The impact of a new housing development, alongside current capacity in the early years and childcare market, should also be considered in terms of early occupation of families and their ability to access provision and whether any interim measures are put in place prior to thresholds of dwellings occupied being reached.

6. How this should be provided

Recent practice suggests to planners / developers that provision should be made for early years and childcare facilities for children 0- 5 years within their plans for the housing developments. Childcare facilities should either be associated within / alongside community facilities or in a dedicated space identified and available for development. In either case, it is suggested that there are advantages with locating adjacent to, or combined with, primary school sites.

For dedicated nursery/childcare facilities, we suggest an area of 0.25 hectares. For combined school / pre-school sites this can be reduced to 0.2 hectares as there can be economies with a more flexible site layout when both are planned together. These

site areas are estimates that the Council has used in other recently provided facilities but will need to be tested against the draft accommodation briefs.

It is assumed that the sites would be made available through an open and transparent process to interested early years and childcare providers; or through the district councils and community associations where it is expected that childcare will be operated within community facilities.

The location of any provision must enable good access for walking along safe and pushchair accessible routes as well as having good public transport and motor-vehicle transport links and be within a 1-2 mile radius of the main housing development.

It should be noted that early years and childcare provisions of 50+ places are considered more economically viable and may attract the best investment opportunity from the sector.

It is also a requirement that a childcare operator that is seeking to accommodate children for free early years education makes an application to Hampshire County Council prior to opening their provision. Any developer who has engaged a childcare establishment to deliver or take up opportunity on their site should ensure the childcare provider contacts Services For Young Children at Hampshire County Council via email childcare@hants.gov.uk at the earliest opportunity.

7. Comments on identified Sites in Fareham Local Plan 2037, Housing Need and Supply

https://www.fareham.gov.uk/PDF/planning/publicationplan/Publication_plan_FINAL.pdf

Ha1 North and South Of Greenaway Lane (824 dwellings)	This proposal would generate demand for an additional 50+ childcare places. The respective development allocations within the draft local plan require proposals to address these needs either directly or by way of a financial contribution. These places are essential, to meet the needs of working families
HA3 Southampton Rd (348 dwellings)	This proposal would generate demand for an additional 20+ childcare places. The respective development allocations within the draft local plan require proposals to address these needs either directly or by way of a financial contribution towards the expansion of existing provision. These places are essential, to meet the needs of working families.

HA4 Downend Rd East (350 dwellings)	This proposal would generate demand for an additional 20+ childcare places. The respective development allocations within the draft local plan require proposals to address these needs either directly or by way of a financial contribution towards the expansion of existing provision. These places are essential, to meet the needs of working families. In our Spring 2020 Childcare Sufficiency Audit Portchester West was identified as an area to be closely monitored due to the collective new and planned housing developments in the area.
HA7 Warsash Maritime Academy (100 dwellings)	The plan does not indicate the provision of childcare facilities. Depending on the housing mix and age demographic of the residents, a small number of additional childcare places for age 2-4 yr olds could be needed. In our Spring 2020 Childcare Sufficiency Audit Warsash was identified as an area to be closely monitored due to the collective new and planned housing developments in the area. Existing settings are close to capacity, including Out of School provision. These places are essential, to meet the needs of working families
HA9 Locksheath Rd (70 dwellings)	The plan does not indicate the provision of childcare facilities. Depending on the housing mix and age demographic of the residents, a small number of additional childcare places for age 2-4 yr olds could be needed
HA10 Funtley Road Sth (55 dwellings)	The plan does not indicate the provision of childcare facilities. Depending on the housing mix and age demographic of the residents, a small number of additional childcare places for age 2-4 yr olds could be needed

<p>FTC 1 (20 dwellings) FTC 2 (100 dwellings) FTC 3 (120 dwellings) FTC 4 (94 dwellings) FTC 5 (49 dwellings) FTC 6 (45 dwellings)</p>	<p>The plan does not indicate the provision of childcare facilities. These are generally small developments in dispersed locations; however collectively they create 428 dwellings in the Fareham Town Centre Area. A new Full Day Care nursery offering approximately 50 places has opened in Fareham Town Centre which may relieve the pressure on places in the area. The impact of new housing on childcare sufficiency in Fareham Town Centre will need to be closely monitored by SFYC.</p>
<p>Planned developments with less than 50 dwellings (HA12,HA13,HA15,HA19,HA22, HA23,HA24,HA26,HA27,HA28, HA29,HA30,HA32,HA33,HA34,HA35,HA36, HA37,HA38,HA39,HA41)</p>	<p>These are smaller developments in dispersed locations. Depending on the housing mix and age demographic of the residents any generated demand can most likely be accommodated in existing provision.</p>

8. Contact

Hampshire County Council's Children's Services can be contacted to discuss any support requirement in selection of appropriate high quality early years and childcare providers or any aspects of the regulation and legislation requirements.

The childcare and early years education development team can be contacted via childcare@hants.gov.uk

Links to documents that may support design of childcare buildings:

<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/sure-start-every-building-matters.pdf>

Keely, Lauren

From: Consultation
Sent: 18 December 2020 15:58
To: Planning Policy
Subject: Hampshire County Council property services response
Attachments: Y005011-04-201217--IS -FBC-REP-Reg19Pre-SubCons-HCCPropertyServicesLetterandCommentsForm.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Snell, Katherine <[REDACTED]>
Sent: 18 December 2020 14:18
To: Consultation <Consultation@fareham.gov.uk>
Cc: Banham, Robert <[REDACTED]> Biles, Mark <[REDACTED]>
Subject: Fareham – Regulation 19 Local Plan (Pre-submission) Consultation

Dear Sir/Madam

Please accept our cover letter with comments form in response to the Publication version of the new Local Plan.
Please get in touch if there are any queries on our submission.

Kind regards
Katherine

Katherine Snell BSc (Hons) PG Dip MSc MRTPI
Senior Planner and Urban Designer
Castle Avenue, Winchester, Hants. SO23 8UJ
Estates and Development Services, Property Services, CCBS,
Hampshire County Council



 www.hants.gov.uk/propertyservices



[Click here to chat to me on MS Teams](#)



Follow us on Twitter [@Hants_Property](#)

"A modern business delivering public services"



[Copyright](#) Hampshire County Council 2004 [Disclaimer](#) [Privacy Statement](#)

Planning Policy Manager
Fareham Borough Council

Enquiries to: Louise Hague

Our ref: Y00511

Tel: 0370 7794077

Your ref: Regulation 19 Local Plan
Consultation

Date: 18 December 2020

Email: louise.hague@hants.gov.uk

Dear Sir/Madam

Regulation 19 Local Plan Consultation

In response to the above consultation, please find attached the general landowner comments in written representations on behalf of Hampshire County Council Property Services, in its role as a public landowner to help inform the next stages of the emerging Local Plan Update to 2038. These are separate from the comments submitted on behalf of Hampshire County Council in respect of its regulatory functions.

As landowner, the County Council will be responding to the Local Plan Consultation on the following Policies/Paragraphs (please see attached):

- Strategic Policy H1: Housing Provision
- Policy D1: High Quality Design and Place Making
- Housing Allocation Policy: HA3 (Southampton Road)
- Housing Allocation Policy: HA9 (Heath Road)
- Housing Allocation Policy: HA13 (Hunts Pond Road)
- Housing Allocation Policy: HA22 (Wynton Way)
- Housing Allocation Policy: HA24 (335-337 Gosport Road)
- Strategic Policy R4: Community and Leisure Facilities
- Policy NE4: Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent
- Policy D4: Water Quality and Resource
- Paragraphs 11.55/56

To date, Hampshire County Council in its capacity as landowner, has supported the earlier stages of the Local Plan Update to 2037. The purpose of the following is to offer comments, from a landowning perspective, to help inform the scope and soundness of Fareham Local Plan when examined by the Secretary of State as anticipated in Summer 2021.

I hope this is helpful to you in continuing to support the Borough Council in subsequent stages of the Local Plan Update to 2037.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Hague'.

Louise Hague MRICS MRTPI
Senior Development Manager

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an AgentAppointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:	Ms
First Name:	Katherine
Last Name:	Snell
Job Title: (where relevant)	Senior Planner and Urban Designer
Organisation: (where relevant)	Hampshire County Council
Address:	Property Services, Castle Avenue, Winchester, Hampshire
Postcode:	SO23 8UJ
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	N/A
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy H1: Housing Provision

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council in its capacity as landowner supports the spatial approach to Policy H1 to distribute development through Local Plan allocations. The County Council considers that this is a sound approach that is positively prepared, justified and deliverable within the Plan period (effective) based on the Borough Council's objectively assessed needs and wider Local Plan evidence base.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒

Yes, I want to take part in a hearing session

☐

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy D1: High Quality Design and Place Making

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council, as landowner, supports Policy D1 as it considers that the density of schemes should be informed by and be sympathetic to the character of the surrounding areas, rather than having a set standard. This allows sufficient flexibility (effective) to support best practice urban design principles particularly with regards to legibility to emphasise the importance of place as well as sensitively manage the transition from an urban to rural settlement edge.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒

Yes, I want to take part in a hearing session

☐

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA3 (Southampton Road)

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council, as one of the landowners for this site, supports the inclusion of this draft allocation and has provided information through the Local Plan process to date to support the allocation. The County Council re-affirms that its land within Policy HA3 is available and deliverable within the Plan period.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒

Yes, I want to take part in a hearing session

☐

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA9 (Heath Road)

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council as a landowner supports the allocation of its land in Policy HA9. The site has a resolution to grant planning permission for 70 dwellings (insert ref). The County Council, as applicant, is currently engaged in on-going discussions with the Borough Council Planning Case Officer, Natural England and third-party providers to put in place sufficient mitigation to achieve a nitrate neutral development. The County Council as landowner has also submitted a pre-application submission to Natural England for consideration of its own land to mitigate the nitrate output of site Policy HA9. This evidence offers a realistic prospect that the site is capable of coming forward in within the early stages of the Plan period. The County Council, as landowner, re-affirms that it's land within Policy HA9 is available and deliverable.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒

Yes, I want to take part in a hearing session

☐

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA13 (Hunts Pond Road)

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council as a landowner supports the inclusion of this draft allocation and has provided information that confirms this site is available, deliverable. This allocation will contribute (indicative yield 38 dwellings) to the supply of housing required over the plan period for the borough.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒

Yes, I want to take part in a hearing session

☐

No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA22 (Wynton Way)

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council as a landowner supports the inclusion of this draft allocation and has provided information that confirms this site is available and deliverable. This allocation will contribute (indicative yield 13 dwellings) to the supply of housing required over the Plan period for the borough.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Housing Allocation Policy: HA24 (335-337 Gosport Road)

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council as a landowner supports the inclusion of this draft allocation and has provided information that confirms this site is available, deliverable and developable. This allocation will contribute (indicative yield 8 dwellings) to the supply of housing required over the plan period for the borough.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy R4: Community and Leisure Facilities

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

B3 Please provide details you have to support your answers above

Hampshire County Council in its role, as both a public landowner and service provider, supports the intentions of Policy R4 to maintain the provision of necessary community facilities during the Plan period. Notwithstanding its support for Policy R4, the County Council is still concerned that the draft policy does not meet the tests of soundness as it appears overly restrictive and not sufficiently flexible to respond to unexpected and ever-changing needs to community facilities brought through public service providers service reviews during the Plan period. This presents a risk that Policy R4 is not effective.

The County Council as a public service provider has an on-going need to review and, if necessary, rationalise surplus facilities as part of wider County Council strategies to improve local services in the community. Such County Council services include 'Children's Services' (pre-school through to the 14-19 year age group), 'Adult Services' (catering for those with learning disabilities, mental health, older people, and persons with physical disabilities), and 'Community and Cultural Services' (libraries, museums, sports, recreation, tourism).

The County Council would like to emphasise its statutory function to provide public services, and to remain effective in meeting this commitment, the County Council will be implementing a series of service-driven improvements, covering both frontline and support services. This may sometimes result in the 'necessary loss' of particular community buildings and land in County Council ownership, in order to reinvest proceeds of sale in local service improvements. The policy should have increased flexibility to accommodate the unique role and function of public service providers.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

The policy should have increased flexibility to accommodate the unique role and function of public service providers and so be effective.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

The County Council therefore recommends the following addition/ changes to Policy R4 to overcome its objection (see below). This draws on the wording of Basingstoke & Deane Borough Council's Adopted Local Plan 2011 – 2029, Policy CN8 – Community, Leisure and Cultural Facilities, part h, and South Downs Local Plan 2014– 2033, Development Management Policy SD43- New and Existing Community Facilities and is therefore a material consideration in Plan making. The County Council's proposed amendment would reinforce the unique role and function of public service providers and their need for managed change to deliver operational service improvements over the Plan period (be effective).

B4c Your suggested revised wording of any policy or text:

Development proposals that would result in the loss of community or publicly owned or managed facilities will be permitted where:

- i. The facility is no longer needed; and
- ii. No alternative community use of the facility is practical or viable; and
- iii. Any proposed replacement or improved facilities will be of equivalent or better in terms of quality, function and accessibility; or
- iv. the proposals are part of a public service provider's plans to re-provide or enhance local services and the proposal will clearly provide sufficient community benefit to outweigh the loss of the existing facility, meeting evidence of a local need.*

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?



Yes, I want to take part in a hearing session



No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy NE4: Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council in its role as a public landowner supports the intentions of Policy NE4 to protect the integrity of the designated sites from increased nutrients. The County Council has confidence that any increased wastewater production related to its draft allocated sites will be suitably mitigated through on-site and off-site mitigation measures as required under the policy.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy D4: Water Quality and Resources

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council in its role, as both a public landowner and service provider, supports the principle of Policies CC1 and D4.

Notwithstanding this, the County Council is concerned that the draft policy does not meet the tests of soundness as it is not sufficiently flexible to respond to unexpected changes during the plan period.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

The policy should have increased flexibility to be consistent with national policy.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

The County Council would be mindful to overcome its objection if the policy is amended to introduce sufficient flexibility in the wording. This would still seek to achieve a high standard of sustainable development but would not require potentially unattainable standards to be met (be effective).

B4c Your suggested revised wording of any policy or text:

To minimise impact on the water environment and adapt to climate change, all new dwellings shall achieve as a minimum the Optional Technical Housing Standard for Water efficiency of no more than 110 litres per person per day, *unless sufficient evidence justifies meeting the mandatory national standard (no more than 125 litres per person per day)*. Development that achieves a higher technical standard of 100 litres per person per day will be supported.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input checked="" type="checkbox"/> | A paragraph | Go to B1a |
| <input type="checkbox"/> | A policy | Go to B1b |
| <input type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

11.55/56

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Hampshire County Council, in its role as a public landowner and service provider, supports the policy aspiration to achieve energy efficiencies in new non-residential development. In particular the County Council notes that paragraph 11.55 considers how the BREEAM assessment process can influence viability of a proposal and make allowances for this, to ensure the plan will remain effective over the plan period. For example, as landowner, the County Council considers that any forthcoming draft policy should be open to demonstrating meeting this energy efficiency standard by alternative equivalent standards such as those based on an embodied carbon (CO2 / Kg / sqm) metric as advocated by the RIBA 2030 Climate Challenge:
<https://www.architecture.com/-/media/files/Climate-action/RIBA-2030-Climate-Challenge.pdf>

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session ☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The County Council could offer further clarification on the points raised.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Keely, Lauren

From: Wootton, Gayle
Sent: 18 December 2020 15:37
To: Planning Policy
Subject: M Biles Hampshire County Council response
Attachments: 10DA58.10 Little Park Farm Road Segensworth - Deed Of Grant EMPR Plan A-10-1036-B.pdf; Y00511-04-201217-FBC-REP-PSCons-HCCPrpertyServices position statement.pdf

Importance: High

Gayle Wootton
Head of Planning Strategy and Economic Development
Fareham Borough Council
01329824328



From: Biles, Mark <Mark.Biles@hants.gov.uk>
Sent: 18 December 2020 12:59
To: Wootton, Gayle [REDACTED]
Cc: Nigel Wolstenholme [REDACTED]
Subject: Landowner position statement: Policy DSP E5 Park Farm, Segensworth
Importance: High

Dear Gayle,

In its capacity as landowner, please find attached a position statement on behalf of Hampshire County Council regarding the allocation of employment land at Little Park Farm, Segensworth.

I understand that Frobisher Developments Ltd will separately be submitting its formal response to the current Fareham Local Plan consultation deadline today in respect of the above site. The attached is therefore just submitted as a statement of evidence to support Fareham Borough Council's consideration of its Local Plan economic development strategy.

Please do not hesitate to contact me if I can be of any further assistance in this matter.

Kind regards

Mark Biles Msc PGDip UD (Dist) MRTPI
Principal Planner / Urban Designer
Three Minsters House, 76 High Street, Winchester, SO23 8UL
Culture, Communities and Business Services (CCBS)
Hampshire County Council



W: <https://www.hants.gov.uk/business/propertyservices/whatwedo/strategy>



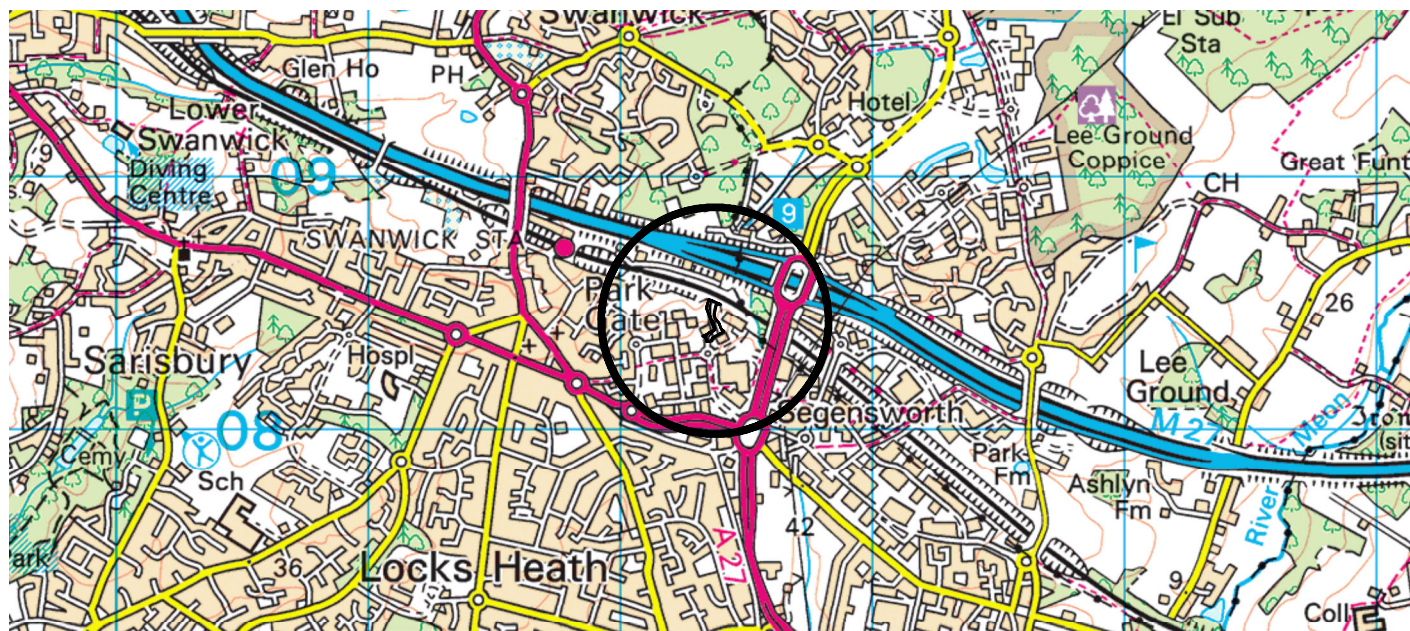
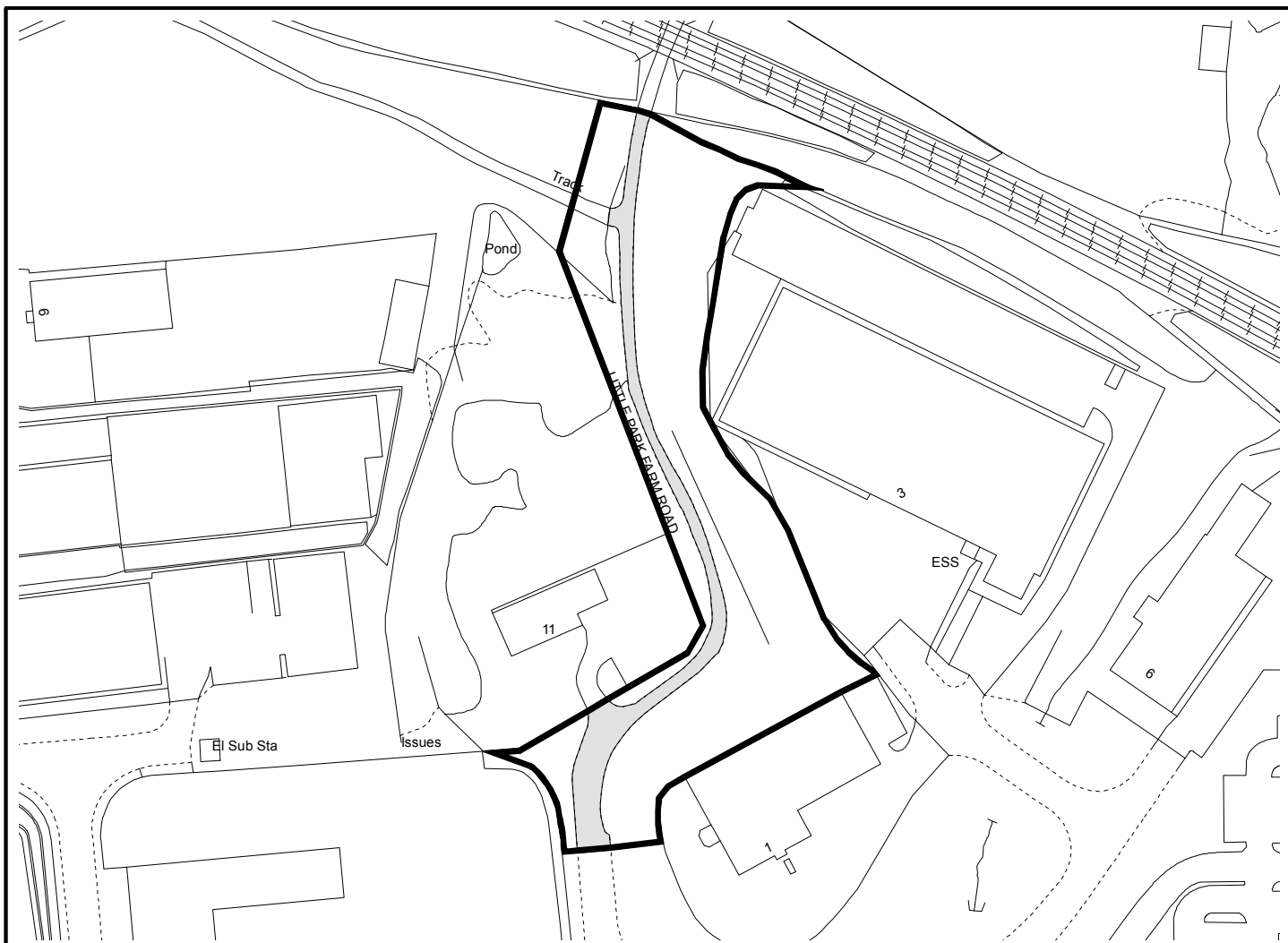
Wash
hands



Cover
face



Make
space



LITTLE PARK FARM ROAD SEGENSWORTH DEED OF GRANT

PLAN NO.
A / 10 / 1036

FILE REF.
10/DA/058.010.0

DATE
December 2018

REV.

B

NOT TO SCALE

© Crown copyright and database rights
2018 Ordnance Survey 100019180.
Use of this data is subject to terms and
conditions. You are granted a non-
exclusive, royalty free, revocable
licence solely to view the Licensed
Data for non-commercial purposes for
the period during which HCC makes it
available. You are not permitted to copy,
sub-licence, distribute, sell or otherwise
make available the Licensed Data to
third parties in any form. Third party
rights to enforce the terms of this licence
shall be reserved to Ordnance Survey.



Hampshire
County Council

**Property
Services**

Gayle Wootton
Head of Planning Strategy
and Economic Development
Fareham Borough Council
Civic Offices, Civic Way
FAREHAM, PO16 7AZ

Enquiries to: Louise Hague

Our ref: LEH/Y00511

Your ref:

Date: 18 December 2020

Email:

Dear Ms Wootton

**Fareham Borough Council Publication Local Plan Consultation: Draft Policy E5
Little Park Farm, Segensworth**

In response to the above consultation, Hampshire County Council wishes to clarify its position as landowner for the above site under Draft Policy E5 linked to the separate written representation from Frobisher Developments Limited.

The County Council's Executive Member for Policy and Resources took the decision on 25 April 2019 to make its land available (see plan attached) and offer improved access rights over Little Park Farm Road to support the delivery of a range of employment use within the site, subject to planning, that would be commensurate with its current allocation under Policy DSP18 of the Fareham Local Plan (part 2).

The County Council has agreed heads of terms and is currently in the process of finalising its draft Agreement with Frobisher Developments Ltd on the above basis.

I hope this is helpful to you in continuing to support the economic development needs of the Fareham Borough Council Local Plan to 2037.

Yours faithfully



Louise Hague MRICS MRTPI
Senior Development Manager

Copy to: Nigel Wolstenholme, Frobisher Developments Limited, Hoplands Estate, Kings Somborne, Stockbridge, SO20 6Q

.../encs.

Keely, Lauren

From: Massie, Neil <[REDACTED]>
Sent: 18 December 2020 11:35
To: Planning Policy
Cc: Planning Consultations
Subject: Hampshire County Council Response
Attachments: Fareham Borough Council Local Plan Regulation 19 Proposed Submission Version - HCC Response 18 December 2020.pdf

Dear Sir / Madam,

Please find attached the Hampshire County Council regulatory response to this consultation.

Because this is a structured corporate response it has not been submitted on the FBC online response page.

Thank you

Regards

Neil

Neil Massie BSc (Hons) MSc
Principal Planning Policy Officer



Strategic Planning
First Floor, Ell Court West,
The Castle, Winchester SO23 8UD



Hampshire
County Council



Hampshire
Services

ENVIRONMENT AND PLANNING

Hampshire Services offers a range of professional consultancy services to partner organisations.

For more information go to www.hants.gov.uk/sharedexpertise

Fareham Borough Council Local Plan (Reg.19) Proposed Submission Version Consultation

Hampshire County Council Response – 18 December 2020

Hampshire County Council does consider the local plan to be sound and legally compliant. The County Council welcomes the opportunity to respond on this consultation and sets out its comments firstly on the Transport Assessment and then on specific local plan policies in its capacity as the local highways authority, local education authority and in its role as an adult services provider with a focus on specialist care.

The County Council then sets out its comments on specific site allocations in its capacity as the local highway authority, local minerals and waste planning authority and also as the local education authority with responsibility for school place planning.

Policy HA2: Newgate Lane South (removal as a housing allocation)

Hampshire County Council is the Local Highway Authority (LHA) for all roads in Hampshire except for motorways and trunk roads and the LHA response is concerned with the potential highway and transportation impacts of the land use proposals set out by the borough council on the local road network. HCC's primary concern as highway authority is the efficient use, management and maintenance of the local highway network. Ensuring that all new development mitigates its impact on the Hampshire network is the function of the highway authority.

The LHA submitted comments in December 2017 and February 2020 in response to the draft local plan regulation 18 consultations. As part of both responses the LHA submitted an objection to policy HA2 (Newgate Lane South). This objection is not resubmitted due to the removal of policy HA2 as an allocated housing site from the revised development strategy in the Publication Plan.

Transport Assessment

At the time of the previous draft local plan consultation in January 2020 the evidence base did not include a completed Transport Assessment (TA) to replace the interim TA published in support of the 2017 draft local plan consultation therefore the local highway authority submitted a holding objection. The TA has now been finalised and forms part of the Publication Plan evidence base.

The LHA supports the methodology used by FBC in preparing a borough-wide TA and the use of the strategic model known as the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the Borough.

The Fareham Local Plan - SRTM modelling report (2020) sets out the Baseline, the Do minimum (with local plan development) scenario and the Do Something (with mitigation) model runs and forms part of the transport evidence base. As part of the strategic transport modelling the LHA understands that a total of 2,150 dwellings was attributed to the proposed Strategic Growth Areas (SGAs) and included in the Do minimum scenario. This means that the strategic modelling was carried out using a higher housing number than is currently proposed in the Publication Plan. The LHA recognises that the strategic modelling with the higher housing number represents a worst-case scenario and that the limitations of the SRTM do not allow for localised impacts at junctions to be attributed to specific development sites. Consequently, it is not possible for the SRTM to isolate the transport impacts of the SGAs on the highway network. Therefore, the LHA accepts the outputs from the strategic modelling report and has not requested an additional model run of the SRTM to reflect the removal of the two SGAs and subsequent lower housing number.

The SRTM modelling report indicates that the incremental impact of all the site allocations including the SGAs is forecast to affect links and junctions across the highway network and particularly along the A27 corridor through Fareham borough. The future resilience of the A27 corridor is a concern for the LHA which is why the LHA is undertaking a transport study for the A27 corridor which the County Council will seek to adopt as future strategy. The strategy will seek to incorporate a multi modal approach that facilitates a modal shift away from private car use. Future transport assessments of development sites along the A27 corridor should take this into account and have regard to the emerging transport strategy.

A key aspect of the A27 corridor strategy will be the application of the 'Link and Place' approach to street planning and design. This approach recognises a street functions as both a link (that is movement by all modes of transport including pedestrians) and a place (destination in itself) and will help determine policy priorities between competing users with a greater emphasis on the function of places. This 'link and place' approach is being developed as a Hampshire County Council policy which will be fully imbedded in the next Local Transport Plan for Hampshire (Local Transport Plan 4).

The TA assessed the cumulative impacts of the site allocations and demonstrates that the significant transport impacts of the local plan development on the highway network can be mitigated through proposed highway interventions. The TA specifically highlights the junction at Parkway/Leafy lane which is north of the M27 junction 9 and serves the Whiteley business estate in the adjoining district of Winchester City Council. The Parkway/Leafy Lane junction is predicted to be significantly impacted by local plan development traffic (with long queues along Leafy Lane) and meets the criteria for requiring mitigation.

However, this junction does not warrant a Do Something mitigation scheme for increased junction capacity. This is because the Leafy Lane arm of the junction leads to a residential area with a 20mph zone reinforced by vertical speed reduction measures. The policy approach by the LHA is to reduce rat-running along Leafy Lane between

Fareham and Whiteley. Therefore, an alternative highway scheme which strengthens the current situation of suppressing flows along Leafy Lane should be the mitigation scheme to be taken forward. The LHA will need further discussions with both Fareham Borough Council and Winchester City Council to establish the form of any mitigation scheme if it is required.

The Do Something modelling for the TA proposed five mitigation schemes for increased junction capacity and modelled only the highway impacts of increased motorised vehicle traffic. There are other solutions for mitigating the transport impacts from local plan development which are more in line with the emerging policy agenda on decarbonising transport from Government and Hampshire County Council. These mitigation options would generally follow a sequential approach to assess their impact on the local road network and the role they can play in traffic reduction and reducing transport emissions starting with measures to avoid the need to travel, active travel measures, public transport (SE Hampshire rapid transit) and finally localised junction improvements. This wider and sequential approach to mitigation will need to be applied to all site-specific transport assessments.

Development Strategy

The LHA acknowledges that the Publication Plan proposes a lower housing number than in the previous draft local plans. This lower housing number is in response to a lower level of housing growth proposed by Government in its consultation in August 2020 on a new standard methodology for calculating the annual housing need. The LHA recognises that FBC need to await the outcome of the Government's consultation before the Publication Plan with the lower housing number can proceed to adoption in line with the FBC's revised Local Development Scheme (September 2020).

The consequence of a reduced housing number is a change to the development strategy and the removal of several housing sites. The LHA supports the removal of housing site HA2 Newgate Lane South. The LHA submitted an objection to policy HA2 in the previous draft local plan consultations.

The LHA also supports the removal of the Strategic Growth Area policy from the Publication Plan. The South of Fareham and North of Fareham Strategic Growth Areas were included in the draft local plan consultations and the LHA submitted a holding objection.

Climate Change

Fareham Borough Council as Local Planning Authority has a legal duty to help meet the requirements of the Climate Change Act 2008. The LHA wishes to be reassured that the borough Council has satisfied itself that the Publication Plan goes far enough in supporting the Government and Hampshire County Council policies on climate change that have emerged during the local plan preparation process. This is in view of the Hampshire County Council's recently adopted climate change strategy and targets to be

carbon neutral by 2050 and resilient to a two degree rise in temperature. For Hampshire to meet these targets, which are in line with Government legal requirements, land-use planning and transport policies at the local district level need to play a strong role and are likely to be most effective at the plan making stage.

The LHA acknowledges the transport evidence submitted in the Strategic Transport Assessment which shows how the traffic impact of the local plan development can be mitigated in traffic and transport terms. The LHA wishes to see demonstrated how the local plan proposals, in relation to transport and how we travel, will contribute to the longer-term goal of achieving carbon neutrality and building resilient networks and systems.

Strategic Policy CC1: Climate Change

The LHA supports the amended climate change chapter and strategic policy CC1 however the supporting text needs more detail with reference to the County Council's adopted Climate Change Strategy (2020) and targets including the resilience of the highway network.

Policy NE8: Air Quality

The local plan correctly identifies road transport emissions as the main source of air pollution which is relevant to the County Council's responsibilities as both highway and public health authority. The LHA supports the local plan commitments to reduce, minimise and mitigate road transport emissions and their impact. However, the Air Quality Policy NE8 needs to be more specific and should be amended to include the policy text 'development should deliver sustainable transport (public transport, walking and cycling) as part of improving air quality'.

Policy TIN1 Sustainable Transport

Given the connection between transport, local plan allocations, air quality and health, there is a lack of commentary or cross reference on air quality management within the Transport Chapter. For example, the supportive text needs to make clear how the transport policies (such as Sustainable Transport TIN1) contribute to both the climate change objectives of reducing CO2 emissions and to the air quality objectives of reducing air pollution.

The LHA recommend amending policy TIN1 on Sustainable Transport to make direct reference to the role of sustainable transport in improving air quality. The supporting policy text also needs to refer to the Air Quality Management Areas / Clean Air Zone designation (on sections of the A27 and A32) and the Air Quality Action Plans in place due to concerns over nitrogen dioxide levels caused by road traffic. Likewise, the Air Quality section needs to refer to the transport chapter and policies and the role they play in mitigating the transport impacts on air quality.

The Transport chapter needs to refer to the Strategic Transport Assessment and the impacts of the local plan traffic on air quality in particular air pollution from the M27, the A32 and A27. This should be cross-referenced with the air quality work carried out as part of the AQMAs and the local plan Sustainability Appraisal. The LHA supports transport mitigation measures of sustainable and active travel modes as an alternative to making private vehicle trips which help overall to reduce emissions harmful to human health and the environment. The LHA would not support any transport mitigation measures which threatened to undermine the success of the current Air Quality Management Areas.

The Transport chapter needs to strengthen the commitment to deliver high quality walking and cycling facilities with reference to the Government's new cycle infrastructure design guidance in Local Transport Note 1/20. Reference to cycle infrastructure design should also be included in the Design chapter.

To contribute to reducing car use, opportunities for enhancing and encouraging active travel to and from school should be encouraged and implemented working closely with Hampshire County Council Children's Services and Highways Departments. The County Council will require the provision of safe walking and cycle routes to schools and existing routes to be enhanced where necessary to improve walking and cycling numbers. Contributions from developers will be sought where necessary including for the production and monitoring of school travel plans (STP's).

PolicyTIN3: Safeguarded Routes

The LHA supports the new policy TIN3 Safeguarded routes in relation to delivering bus rapid transit in Fareham and Portchester. However, the supporting text should refer to the future extensions of the SEHRT network to the west of Fareham towards Segensworth, Swanwick Station, Whiteley and the North Whiteley major development area and to serve the Solent Enterprise Zone at Daedalus and adjacent coastal settlements.

Strategic Policy R4 Community and Leisure Facilities

Hampshire County Council Children's Services consider that it is important that the impact of additional housing is assessed and where necessary developer contributions are provided to provide additional childcare places either through on-site facilities or the expansion of nearby provision. The impact will be assessed on a case-by-case basis.

The County Council also provides an Early Years guidance note on this issue for the Borough Council to consider in their plan making in relation to the future need and housing allocations.

Strategic Priority 8

Hampshire County Council Adult Services welcome the reference to affordable housing and the need to address the specific needs of different groups in the community, including the elderly and people with disabilities. However, it is recommended that reference is made to the need to meet a range of housing needs, including those in need of affordable housing and those in need of specialist housing including the elderly and people with disabilities in Strategic Policy H1: Housing Provision.

Consideration should also be given to whether opportunities are available to encourage specialist housing provision in specific site allocations.

Policy HP 5: Affordable Housing

The County Council recommend that Policy HP5 or the supporting text should encourage the provision of housing to meet a range of needs, including specialist housing to meet older persons' needs (such as extra care housing) and those with disabilities.

Policy HP7: Adaptable and Accessible Dwellings

The County Council notes that the Specialist Housing Topic Paper includes reference to the low cost of providing homes to above base accessibility standards. Although there is a correlation between age and mobility, people of all ages may have some mobility impairment, either permanently or temporarily.

The proposed percentages of housing the policy requires to be built to higher accessibility standards is modest and given the rate at which the stock is added to each year it will be a very long time before a significant supply of accessible housing is available in the Borough. With such modest levels of provision, the likelihood of a person who develops mobility impairment will find themselves in a home that can meet their needs is low. Adopting a requirement for a larger proportion of the stock to be built to Cat2 standards in particular would better meet individuals' changing needs and support the creation of sustainable communities by reducing the need to move to find suitable accommodation.

Policy HP 8: Older Persons and Specialist Housing Provision

The inclusion of an enabling policy is welcomed by the County Council; however it is recommended there is specific mention of specialist provision of affordable housing, including extra care housing and housing for those with disabilities. It is noted that specific housing allocations are made only in respect of sheltered accommodation (Policies HA42 / 43 /44). The County Council consider that these sites may also be suitable for other forms of specialist housing, including extra care housing and housing for those with disabilities. It is recommended those policies are amended to reflect this.

The County Council supports the opportunity for exception type development in specific circumstances in this policy and Policy HP6.

Housing Site Allocations

The County Council has considered the housing allocations in its capacity as the local highways authority, local education authority and local minerals and waste planning authority and provides the following commentary.

An initial assessment of the impact on school place planning has been considered based on the level of housing identified, and details are highlighted below for specific sites where there will be an impact on the supply of local school places at primary, secondary and education for pupils with Special Educational Needs and Disabilities (SEND).

The County Council as the local minerals and waste planning authority is pleased to see that some of the comments regarding mineral and waste safeguarding, from the Regulation 18 consultation, have been considered and included within the Regulation 19 proposed submission document. Within the County Council's Regulation 18 response a list of sites that were deemed to require a Mineral Resource Assessment as part of any potential application was provided. It is noted that all the allocated housing sites that the County Council made such comments on have been removed from the Proposed Submission Document as being no longer available or no longer suitable.

Housing Allocation Policy HA1 – North and south of Greenaway Lane – 824 dwellings

The development of 824 dwellings will create additional pressure for school places locally at primary, secondary and special schools. It is welcomed that the need for developer contributions has been identified and they will be sought to provide additional educational infrastructure where required. Pedestrian and cycle paths should be provided to local schools and existing routes enhanced where necessary to promote active travel to and from schools.

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council's data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement j.

Housing Allocation Policy HA3 – Southampton Road – 384 dwellings

The identification of the need for developer contributions for education and ensuring safe walking/cycling routes to local schools are provided, is welcomed.

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council's data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement k.

Housing Allocation Policy HA4 – Downend Road East, Portchester – 350 dwellings

It is welcomed that the need for developer contributions has been identified and they will be sought to provide additional educational infrastructure where required. Pedestrian and cycle paths should be provided to local schools and existing routes enhanced where necessary to promote active travel to and from schools.

Whilst the County Council welcome the inclusion of site-specific requirement j, that the site will require a Minerals Assessment prior to any development. The County Council would also like to bring to the Borough Council's attention that this allocated housing site sits within the safeguarded buffer zone of Warren Farm and Down End Quarry, a safeguarded waste site operated by Veolia Environmental Services (UK) Plc.

The safeguarded buffer zone is informed by the safeguarded sites list as defined through 'Policy 26: Safeguarding - waste infrastructure' of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). The purpose of this policy is to protect current and potential waste sites from pressures to be replaced by other forms of development, including through 'encroachment' where nearby land-uses impact their ability to continue operating.

It is often the case that appropriate buffers and mitigation measures can make potential nearby development compatible. Any mitigation measures would need to be undertaken by the proposed non-minerals or waste development (i.e. the allocated housing development) and reduce potential impacts to and from the safeguarded site to levels that would ensure the safeguarded site could continue its intended waste use.

Usually, the mitigation measures would need to focus on impacts such as noise, dust, visual impact, odour and traffic movements. They can take a variety of forms, including landscape design, tree planting, barriers, building design and orientation and use of different building materials.

The appropriate mitigation measures are best informed through direct discussions with the operator of the safeguarded site as they will be most be aware of operational requirements. However, the County Council is also available for further discussions, as well as facilitation, if required.

With regard to the above site, the County Council would therefore request further wording be added to the site-specific requirements of allocated housing site HA4 as set out below:

“the provision of evidence that the safeguarded site has been considered within any forthcoming planning application, how operator comments have been taken into account and what impacts these comments have had on the proposed development design. Details of any mitigation measures chosen as a result of the analysis should also be included with an application for the site”.

In the unlikely event that it is not possible to agree appropriate mitigation measures, the County Council would seek evidence that the waste management capacity can be relocated or provided elsewhere and delivered.

Housing Allocation Policy HA9 - Heath Road

Whilst the County Council welcome the inclusion of site-specific requirements for Minerals Assessments across the Proposed Submission Document, based upon the County Council’s data, this site does not sit within the Minerals and Waste Consultation Area (MWCA). As such, the County Council do not require that an application for the site be accompanied by a Minerals Assessment, as outlined in site-specific requirement g.

Policy HA2: Newgate Lane South

The County Council as local highway authority supports the removal of policy HA2 Newgate Lane South.

Strategic Growth Area

The County Council as local highway authority supports the removal of the Strategic Growth Area policy.

Employment Allocations

The County Council has considered the employment site allocations in its capacity as local minerals and waste planning authority and provides the following commentary.

Policy E2 - Faraday Business Park

Whilst a number of the allocated housing sites have had site-specific requirements added to them for Minerals Assessments, allocated employment site E2 - Faraday Business Park has not had any added. In line with the County Council’s Regulation 18 response to the local plan consultation, the County Council again request that a site-specific requirement be added to this allocated site policy so that any forthcoming planning application would need to be accompanied by a Minerals Resource

Assessment. The County Council recommend adding the following site-specific wording: The site is within a Minerals Consultation Area. Minerals extraction may be appropriate, where environmentally suitable, subject to confirmation of the scale and quality of the resource.

The County Council would like to take this opportunity to reiterate that any development or significant redevelopments of land may impact mineral resources. As minerals can only be worked where they are found, it is important that viable mineral resources are 'safeguarded' (protected) from needless sterilisation by other development to help to secure a long-term future supply of minerals. Mineral resources are necessary for a vast array of construction activities and their availability is a prerequisite for any housing development. As such, the NPPF requires planning authorities to define Minerals Safeguarding Areas and adopt policies so that, 1) known locations of mineral resources of local and national importance are not needlessly sterilised by non-mineral development, 2) if it is necessary for non-mineral development to take place, the prior extraction of minerals, where practicable and environmentally feasible, is encouraged.

Keely, Lauren

From: York, Stuart,17529 [REDACTED]
Sent: 25 November 2020 15:04
To: Planning Policy
Subject: RE: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)
Attachments: RESPONSE TO THE REGULATION 19 LOCAL PLAN CONSULTATION.docx

To whom it may concern,

Please find attached my comments reference the above consultation.

Regards

Stuart

From: Planning Policy [mailto:PlanningPolicy@fareham.gov.uk]
Sent: 06 November 2020 15:47
Subject: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Dear Sir or Madam,

Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Fareham Borough Council is launching the next stage of its consultation on the new Local Plan 2037. The Council is inviting comments on its Publication Local Plan which it intends to submit to the Secretary of State for independent examination.

The Fareham Local Plan 2037 will cover the Borough of Fareham excluding the area covered by Local Plan Part 3: the Welborne Plan. The Fareham Local Plan 2037 will set out the development strategy and policy framework for Fareham and once adopted, will be used to guide decisions on planning applications up to 2037. The Publication Plan, which the Council is now consulting on, includes the vision for the Borough, the overall strategy that directs the location of development, the sites that have been identified for development in the Borough, the policies that will be used to make decisions on planning applications, and how the plan will be monitored.

The Publication Plan is accompanied by a policies map which shows the policy allocations and designations.

Where to view the proposed submission documents:

The Publication Plan, the proposed submission documents and the relevant evidence base will be available for inspection from 6 November 2020 until 18 December 2020:

- a. on the Council's website at <https://www.fareham.gov.uk/localplanconsultation>
- b. subject to Covid 19 restrictions, by prior appointment at the Fareham Borough Council Offices during office hours:

Office opening hours (excluding Bank Holidays) are:
Monday to Thursday 8.45 a.m. to 5.15 p.m.
Friday 8.45 a.m. to 4.45 p.m.

The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020^[1] temporarily removes the requirement to provide hard copies of Local Plan documents for inspection in Council offices and other public locations in the Borough, in response to the coronavirus pandemic.

Period of publication for representations:

The Council will receive representations on the Fareham Local Plan 2037 for a six-week period which runs from **6 November 2020 until 11.59pm on 18 December 2020**. As set out in the Town and Country Planning (Local Planning) (England) Regulation 20 (2), **any representations must be received by the date specified**.

How to make representations:

Representations can be made through the following means:

- Online: By using the Council's online response form at <https://www.fareham.gov.uk/localplanconsultation>
- Emailing your response to planningpolicy@fareham.gov.uk
- Paper copies of the response form are available upon request by telephoning 01329 824601.
- Paper copy response forms should be sent to the Consultation Team, Fareham Borough Council, Civic Offices, Civic Way, Fareham, PO16 7AZ and must be received within the six-week consultation period stated above.

Content and structure of representations

Following the consultation period, the Local Plan will be submitted for examination by an independent Planning Inspector, appointed by the Secretary of State. The Inspector's role is to examine whether the submitted plan meets the tests of soundness (as defined in the National Planning Policy Framework paragraph 35) and meets all the relevant legislative requirements, including the duty to co-operate.

The Planning Inspector will consider representations made during this period of consultation. Any comments on the Publication Plan should specify the matters to which they relate and the grounds on which they are made.

Only the following matters will be of concern to the Planning Inspector:

- **Legal Compliance** – does the plan meet the legal requirements for plan making as set out by planning and environmental laws?
- **Soundness** – has the plan been positively prepared, is it justified, effective, and consistent with national policy?
- **Meeting the Duty to Cooperate** – has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

The Council has produced a Special Edition of its Fareham Today publication to help those wishing to respond to the consultation.

Request for further notification of Local Plan progress

When making a representation you can ask to be notified at a specified address of any of the following:

- Submission of the Fareham Local Plan to the Secretary of State for examination
- Publication of the recommendations of the person appointed to carry out the independent examination of the Fareham Local Plan on behalf of the Secretary of State
- Adoption of the new Fareham Local Plan

It is important that the Planning Inspector and all participants in the examination process are able to know who has given feedback on the Publication Plan. All comments received will therefore be submitted to the Secretary of State and considered as part of a public examination by the Inspector. In addition, all comments will be made public on the Council's website, including the names of those who submitted them. All other personal information will remain confidential and will be managed in line with the Council's Privacy Statement.

The Examination Process

The examination is open to the public. Subject to the venue's seating availability, anyone can attend to listen to the discussions but there are strict rules which apply to those who wish to participate. If you wish to appear

at the examination as a participant, such a request must be made as part of the representation on the Publication Plan. The right to appear and be heard by the Inspector at a hearing session is defined in the Planning and Compulsory Purchase Act 2004 section 20 (6).

Kind regards

Planning Strategy
Fareham Borough Council
01329824601



This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Hampshire Constabulary currently use the Microsoft Office 2013 suite of applications. Please be aware of this if you intend to include an attachment with your email. This communication contains information which is confidential and may also be privileged. Any views or opinions expressed are those of the originator and not necessarily those of Hampshire Constabulary. It is for the exclusive use of the addressee(s). If you are not the intended recipient(s) please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error please forward a copy to: informationsecurity@thamesvalley.pnn.police.uk and to the sender. Please then delete the e-mail and destroy any copies of it. DO NOT use this email address for other enquiries as the message will not be responded to or any action taken upon it. If you have a non-urgent enquiry, please call the police non-emergency number '101'. If it is an emergency, please call 999. Thank you.

[1] <https://www.legislation.gov.uk/ukxi/2020/731/introduction/made>



Gosport NPT Neighbourhood Police Office

Town Hall
High Street
Gosport
Hampshire
PO12 1EB

Telephone

101

Direct Dial

023 8047 8566

Fax

01962 874201

Text Relay

18001 101

Email Address

Consultation Team
Fareham Borough Council
Civic Offices
Civic Way
Fareham
Hampshire
PO16 7AZ

Our ref: FBC-01

Your ref:

25th November 2020

Dear Sir or Madam,

RESPONSE TO THE REGULATION 19 LOCAL PLAN CONSULTATION

Thank you for your email of the 6th November 2020 and the opportunity to respond to the consultation. Having considered the document I have the following comments to make with reference to prevention of crime and disorder¹.

Crime and disorder are aspects of life that people do not like to consider or admit occur where they live. Unfortunately, crime and disorder occurs throughout the Borough of Fareham, left unchecked crime and disorder ruins lives and undermines communities. Every opportunity must be taken to reduce the opportunities for crime and disorder, the planning process is one of those opportunities.

Government policy is that the design and layout of a development must be such that it reduces the opportunities for crime and disorder (anti-social behaviour). To that end various pieces of legislation and guidance demonstrate the Government's commitment to reducing crime and disorder (by use of the planning system) some of which are referenced below:

- (i) Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise their functions with due regard to their likely effect on crime and disorder, and to

¹ In the context of this letter "disorder" includes Anti-Social Behaviour (ASB)



www.hampshire.police.uk

Deaf? Non-emergency text **07781 480999**

For crime and community information www.hampshirealert.co.uk



do all they reasonably can to prevent crime and disorder². Crime for these purposes includes terrorism.

(ii) The National Planning Policy Framework (NPPF):

Paragraph 127. Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

(iii) Planning Practice Guidance (PPG); Healthy and Safe Communities; Supporting Safe Communities:

a. What is the role of planning in preventing crime and malicious threats?

i) Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides.

b. How can planning help achieve resilient places?

i) Good design means a wide range of crimes from theft to terrorism are less likely to happen by making committing those crimes more difficult. It helps create safer places, infrastructure and buildings that are less vulnerable to terrorist attack and, should an attack take place, where people are better protected from its impacts. It can also reduce the cost and impact of security measures by avoiding retrospective works and enable mitigating measures to be blended into the environment.

It is clear that Central Government's intention is that the design of a development must contribute to reducing the opportunities for crime and disorder. The proposed local plan must reflect national planning policies as set out in the National Planning Policy Framework and associated Planning Practice Guidance, and in this context should contain the Council's policy on reducing crime and disorder.

Within the Local Plan there are several paragraphs that acknowledge that low levels of crime and disorder bring benefits to the area, but the plan does not expand on this:

Paragraph 2.5, of the local plan, states:

"The Local Plan assists with engendering a feeling of safety and security in our everyday activities by ensuring places are well-designed for activity both during the day and night. Proposed growth within Local Plans must be assessed in terms of the impacts on highways and how people use walking and cycling routes, and needs to demonstrate that any new growth on our road network is designed with safety in mind."

² Section 17 states "crime and disorder in its area (including anti-social behaviour and other behaviour adversely affecting the local environment); and etc."



www.hampshire.police.uk

Deaf? Non-emergency text **07781 480999**

For crime and community information www.hampshirealert.co.uk



Paragraph 2.10, of the Local Plan, “The Fareham Local Plan 2037 Vision”, states:

“Fareham Borough will offer a high quality of life to all residents and be an attractive, safe and pleasant place to live, work and visit. It will be a sustainable and increasingly prosperous place, with low levels of crime and unemployment and good access to community facilities, jobs, leisure, shops, open space and services.”

Achieving a low level of crime does not happen by chance, it requires policies designed to reduce the opportunities for crime and disorder. To that end we would ask that the following amendments are incorporated into the Local Plan:

Within paragraph 11.4 we would ask for an additional bullet point entitled: “Prevention of Crime and Disorder”

Within the Design section of the Local Plan we would ask for several paragraphs relating to the prevention of crime and disorder are added, worded as below, or with words so as to convey the same meaning:

“Low levels of crime are one of the elements of the vision. Research has shown that developments incorporating Crime Prevention Through Environmental Design (CPTED) principles, which includes attributes such as: development layout, defensible space about dwellings / buildings, good natural surveillance of the public realm (including footpaths and cycle ways), the provision of lighting to the current British Standard and the appropriate boundary treatments, suffer less crime and disorder.”

“The Secured By Design (SBD)³ award scheme incorporates the design and security elements required to reduce the opportunities for crime and anti-social behaviour. The Local Planning Authority will be supportive of proposals which are assessed under the Secured By Design (SBD) Award Scheme. Those proposals which have, or are demonstrably committed to achieving SBD accreditation will be looked upon favourably.”

Within Policy D1: “High Quality Design and Place Making” an additional subparagraph is added worded as below, or with words so as to convey the same meaning:

“All development must incorporate CPTED measures to reduce the opportunities for crime and disorder.”

³ The Secured By Design (SBD) Award Scheme is a police initiative to guide and encourage those engaged with the specification, design and building of new homes to adopt crime prevention measures. Secured by Design has been proven to reduce the opportunities for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the UK Police Service and is supported by the Home Office.



www.hampshire.police.uk

Deaf? Non-emergency text **07781 480999**

For crime and community information www.hampshirealert.co.uk



To be consistent with national policy the Local Plan must enable delivery of sustainable development in accordance with the NPPF. The omission of any policy relating to the prevention of crime and disorder means the Local Plan is not as “consistent” as it might be. We would ask the above amendments are incorporated into the Local Plan.

I would bring to your attention that paragraphs 11.55 and 11.56 of the Local Plan appear to be the same.

If I can be of any further assistance please do not hesitate to contact me.

Yours faithfully,

S York
Designing Out Crime Officer




www.hampshire.police.uk

Deaf? Non-emergency text **07781 480999**

For crime and community information **www.hampshirealert.co.uk**



Respondent details:

Title:	Dr
First Name:	Alan
Last Name:	Hawkins
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA4 - Downend Road East

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The Publication Local Plan online is out of date. It shows the status of this application up to July 2020. Since then a 'new' application by Miller Homes has again been rejected with a suggestion that an appeal would be inappropriate. The reasons for rejection surely indicate that this piece of land should be removed in its entirety from the plan, just as the land to the west of Downend Road has now been removed. This valuable farm land should be classified as protected under the proposed new Government classifications. We are assuming that it remains in the published plan due to an oversight or failure to update and need to alert Fareham Borough Council of the danger that leaving this in the current local plan could lead to it being 'set in stone' and open to 'do as you please' development in the future with absolutely no say either by local residents or Fareham Borough Council.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Bring it up to date with latest status.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

it would bring it up to date, as currently it is incomplete.


Your suggested revised wording of any policy or text:

Remove HA4 entirely from the Plan.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Phillip
Last Name:	Hawkins
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA1 - North and South of Greenaway Lane

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Issues Relating to Legal Compliance: Community Participation Para 1.5: Statement of Community Involvement Para 2.1 states a "variety of methods" should be used to solicit comments from the public. The lack of distribution of paper documents across the Borough has denied high proportions of residents the opportunity to make their views known. Covid, ie access to Council offices and libraries has also had an adverse impact. Residents' voices have been disregarded despite protest marches, delegations and objections put forward. Petitions raised by the community which qualified for a full Council meeting debate was refused, even though challenges were made via the Council's scrutiny procedure. Community evidence has been ignored in favour of developers, eg traffic surveys/previous use of land in nitrate budget calculations. Para 4.7: The Warsash N/hood Forum was not consulted in relation to the intention to allocate housing, (Para 66 of the NPPF) Housing Allocations. The amount of new homes, excluding Welbourne, put forward for sites across the Borough is 1342. The proposed distribution is unbalanced-HA1 being allocated to take 62%-830 homes. FBC are now suggesting Warsash suffer a further 20% increase. The HA1 has little continuity. Developers are working in isolation of each other, increasing the potential adverse harm. This will alter the outcome of the present environmental analysis in its totality, making it necessary for a further environmental assessment in order to reflect these issues. Para 4.19: Housing Policies - HA2,5,6,8,11,14,16,18,20,21 and 25 are now not being considered as locations. On what criteria was HA1 selected and housing needs assessed for this site? HA1 has been adjusted to accommodate developers in that boundaries have been adjusted to suit and fit their sites. This has resulted in what seems to establish a substantial bias towards the developers. Habitats Directive Para 9.10: The LPA breaches the Habitats Directive and the publicised Plan. QC's opinion is it is unclear how any development could be contemplated in the Western Wards without negatively impacting the SAC and RAMSAR sites and therefore based on proximity alone, this would invalidate the deliverability of these developments. Advice from N/England - It is the responsibility of the LPA to fulfil its legal obligations and satisfy themselves beyond doubt, that adverse effects on designated SAC, SPA and RAMSAR sites from harmful nutrients generated by new residential development, has been mitigated (rather than compensated). It is doubtful that the LPA is acting in accordance with N/England advice accurately and lawfully in this respect. Test of Soundness Settlement Definition Policy HA1-(Currently a Greenfield Site) is being put forward to be redesignated as a URBAN area (via the re-definition of Settlement Boundaries ref. WW17). The foreword in the Publication Plan defines that Greenfield sites are less favoured locations for development. Para 2.10 states Fareham Borough will retain its identity, valued landscapes and settlement definition and will protect its natural, built and historic assets. HA1 goes against these principles, as does Para 2.12. Strategic Priorities aims to develop within urban areas and not encroach on countryside in order to generate and encourage healthier lifestyles. Changing the designation of Policy HA1 to Urban and aligning settlement boundaries to facilitate developers is an unashamed attempt to alter existing criteria to suit Council's own purposes. Infrastructure Policy HP4 (Para 5.24): HA1 fail to satisfy criteria e) proposal. The proposal would have intolerable environmental, amenity and adverse traffic issues. Policy HA1: Page 51 refers to traffic routes regardless of recommendation to limit access to 6 dwellings on Greenaway Lane. The Plan proposes for up to 140 dwellings access to be accomplished by widening the oldest Lanes in Warsash, creating negative impact on the characteristics and history of the Lane and the safety of pedestrians. Page 54 suggests 7 new accesses onto the already very busy Brook Lane and Lockwood Rd, as well as one additional access at Brook Lane, via 3 entry points from Greenaway Lane. This will in all probability result in unacceptable and avoidable risks from traffic congestion/accident blackspots. Para 10.15: The Transport Plan fails to include an analysis of streets where the majority of the houses are proposed. 830 new dwellings are proposed, and as yet no analysis has been given to HA1 in the transport assessment. An average of 2 cars per dwelling, ie approx. 1600 additional vehicles will add to already congested roads with no indication mitigation. This Plan falls short of meeting 'The Test of Soundness' by not addressing these key issues. Para 10.14: The Local Plan Strategic Transport Assessment(LPSTA) Para 4.16 - "In conclusion, based on the work of this LPSTA, it is considered that the quantum and distribution of the development proposed in the Local Plan, and the resulting transport impacts, are capable of mitigation at the Strategic level, and that the Plan is therefore deliverable and sound from a transport perspective." This statement fails to address the area HA1, of the local Plan and the 830 homes, with no assessment within the LPSTA. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches". The provision of these is not addressed. Why? Housing Needs Methodology Para 3.27 figure 3.2: The map only shows 8 growth areas. This is not accurate as there are more. Needs rectification. Para 4.2: This part of the Publication Plan is unsafe as it bases housing numbers on a proposed new process for calculating need. This is a potential risk in that it may not be adopted by the government. In addition Page 37 Paras 4.12, 4.16 and Policy HP1 identifies that whilst a contingency buffer of 1094 homes has been made, the Plan is heavily reliant on the certainty of delivery on 4858 houses at Welborne. Occupancy rates Para 5.41: The LPA makes a case for an average occupancy rate of 2.4 for a 4/5 bed dwelling with reference to Nitrate budget calculations. However the opposite is expressed here, ie the range of occupancy for affordable homes will be in the range of 4 - 6. The Publication Plan claims are therefore not adhered to its own proposals and guidelines. Carbon Reduction Para 8.60: Section 8-the need to achieve CO2 emission reduction targets. However, instead of identifying the actual targets, the Plan simply refers to individual developments power usage, as opposed to what each should deliver over and above Building Regs requirements. Therefore the plan is not 'Positively Prepared'. Para 11.34 -The Council will support applications where development exceeds Building Regs. No % target for this improvement has been identified, making the Plan unfit and not a sound effective approach to carbon emissions reduction. Para 11.36: Developers are encouraged to design for natural ventilation and green infrastructure but no standards are set. Just meeting Building Regs will not see the country meet the government promised carbon reductions. The Council therefore should set standards to ensure developers are designing for sustainability, see-encompasses London Boroughs that are using new standards of SAP10, which although not yet within Building Regs, should be adhered to. Retail Facilities Para 7.13: Local retail/commercial facilities figures do not cater for the additional houses in Warsash.

Please provide details you have to support your answers above

What modification(s) is necessary to make the Local Plan legally compliant or sound?

See previous comments

How would the modification(s) you propose make the Local Plan legally compliant or sound?

See previous comments


Your suggested revised wording of any policy or text:

See previous comments

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Tim
Last Name:	Haynes
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: DS1 - Development in the Countryside

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The 2037 plan is sound in many respects. More so than its predecessor. However, I have some reservations. Firstly, the plan includes in Paragraph 1.14 an assertion that it is prepared predicated on reduced identified housing need suggested by the Standard Method calculation in the Government's proposed "Changes to the Planning System" document. This is still under review, and since it has not been finalised yet, and has generated considerable interest and even opposition among local authorities as well as the public, it seems unwise to base such a crucial calculation on an as-yet uncertain process. This would have a bearing on Fareham Borough Council's ability to fulfil its Five-Year Housing Land Supply obligations, it also has a bearing on some of the policies in the plan that seem to be linked and would have implications for the retention of the Strategic Gaps within the borough. Policy DS1 reinstates the strategic Gaps as that not Strategic Growth Areas. To this extent, the plan is sound. However, paragraph 3.46 goes on to suggest that there is "evidence" that the boundary of the Fareham / Stubbington Gap could be redrawn "... whilst retaining its important function of preventing settlement coalescence." That evidence is the opinion of a Hampshire County Council Planning official as part of their Technical Review of Areas of Special Landscape Quality and Strategic Gaps: Chapter 4: Strategic Gaps Conclusions and Recommendations paragraph 10. The author states: • "The Fareham-Stubbington Strategic Gap is also proposed for continued designation, also having strong sub-regional support, and a clear and continued role, but there exists (sic.) some opportunities for development to be absorbed within the Strategic Gap, subject to scale and future detailed design, without compromising its Gap function combined with mitigation measures that can support GI enhancement." This constitutes an opinion, albeit possibly an informed one, not evidence. This uncertainty about the borders of this particular Gap reduces the soundness in my mind, when taken together with Policy DS1 which outlines the conditions for any development in the Strategic Gaps. On its own Policy DS1 is innocuous enough, but it seems to be linked in Section e to a set of policies (HP1, HP2, HP4, HP5, HP6 and HP11) three of which might allow for exactly the development policy DS1 seeks to exclude. Policy HS4, which allows for the possibility that the Council may not meet the Five-Year Housing Supply criteria, seems to provide that the first place the Council will look to make good the deficit by looking outside Fareham's urban areas. Surely, the first look should be at brownfield sites in the borough. Policies HS5 and HS6 seem, prima facie, to offer the possibility of development of affordable housing within strict criteria. However, they are both included in the policy DS1 description. This linking offers the possibility that opportunistic developers may try to use the Affordable Housing gambit to build at just the right size to meet the conditions, but, with the link to the Five-Year Housing Supply as a primary consideration, develop in a way that incrementally aggregates to a more sizeable encroachment on the Strategic Gap. I believe these three Policies should be reconsidered, or at least their link to Policy DS1 before the plan is approved. If not, there is a considerable risk that developers may be able to take advantage of the poor drafting to pursue their aims in the Strategic Gap with the Council unable to constrain, or unaware of, the actual effects. Policy E1 / E2 / E3 / E4 / E5 / E6 These policies while in themselves, sound, seem to pursue an agenda that is not active in promoting either the government's Green agenda, nor common sense when it comes to climate change. While it is appreciated that any Production Plan shall be as anodyne as possible in order to pass the inspection, it is notable that none of the above policies does anything to suggest that there should be any preference for types of employment. With the UK government's recent suggestion that it wishes to pursue a Green Industrial Revolution, albeit this hasn't yet been put into legislation, the Fareham Plan includes nothing that points to sustainability in environmental terms not supports any environmental agenda or attempt to address climate change. It would have been encouraging to see any of the identified sites, including Daedalus, being suggested as a potential home for green industry, whether manufacture of energy generating technology, environmental remediation, R & D or just green-related consumer business. There is also no mention of Gosport Borough and any collaboration or consultation with them, which I would have thought was a necessity given the effect that any increased employment and movement of people would definitely have on shared infrastructure; transport links, roads etc. While Fareham and Gosport Boroughs' connections via the Solent LEP and PFSH indicate that they may confer, there is nothing in the plan that acknowledged the close interest in Fareham as a means of getting off the Gosport peninsula Policy E7: Solent Airport This policy Focusses exclusively on aviation business, with the relatively unrealistic aim of making what is plainly an airfield into an "airport"; "The airfield at Daedalus, herein called Solent Airport". That this seems to be earmarked for growth, not in the plan, explicitly, it a matter of great regret. The government has clearly indicated that it does not wish to see expansion of runways in the south East except for at Heathrow. And even that will require a reduction elsewhere. Fareham Borough Council is mistaken if it thinks that opening the airfield to potentially to jet flights is an acceptable development. It is contrary to the Government view on tackling Climate change; in inviting extra traffic in to the airport it also adds to the general level of traffic on the existing roads in the area, potentially negating the advantages that we are promised from the Stubbington by-pass.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

While I appreciate that Fareham Borough Council may read some of the attached, I am not certain that they will act on any of it. I'd like to be sure that it is considered.

2) Policy: HP4 - Five-year Housing Land Supply

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Uncertainty about the borders of the Fareham - Stubbington Strategic Gap reduces the soundness of the plan in my mind, when taken together with Policy DS1 which outlines the conditions for any development in the Strategic Gaps. On its own Policy DS1 is innocuous enough, but it seems to be linked in Section e to a set of policies (HP1, HP2, HP4, HP5, HP6 and HP11) three of which might allow for exactly the development policy DS1 seeks to exclude. Policy HS4, which allows for the possibility that the Council may not meet the Five-Year Housing Supply criteria, seems to provide that the first place the Council will look to make good the deficit by looking outside Fareham's urban areas. Surely, the first look should be at brownfield sites in the borough. Failure to do so puts non-urban land; countryside, at risk.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I am not sure Fareham Borough Council will fully consider the effects of the policies they have proposed against the comments made by myself and others. I'd like to be able to make sure they do.

3) Policy: HP5 - Provision of Affordable Housing

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Policies HS5 and HS6 seem, prima facie, to offer the possibility of development of affordable housing within strict criteria. However, they are both included in the policy DS1 description. This linking offers the possibility that opportunistic developers may try to use the Affordable Housing gambit to build at just the right size to meet the conditions, but, with the link to the Five-Year Housing Supply as a primary consideration, develop in a way that incrementally aggregates to a more sizeable encroachment on the Strategic Gap. I believe these three Policies should be reconsidered, or at least their link to Policy DS1 before the plan is approved. If not, there is a considerable risk that developers may be able to take advantage of the poor drafting to pursue their aims in the Strategic Gap with the Council unable to constrain, or unaware of, the actual effects.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

I would urge the removal of reference to HP5 from Policy DS1 section e.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

By removing HP5, which is aimed at promoting the construction of affordable housing on sites of 10 properties or more and which could, as linked to Policy DS1, be used to allow for development outside urban Fareham in pursuit of reaching the affordable housing target, the possibility of unscrupulous developers effecting incremental large scale development in the Fareham - Stubbington Strategic Gap is reduced.

Your suggested revised wording of any policy or text:

.... e) Is for housing development compliant with one of the following policies; HP1, HP2 or HP11, or ...

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I don't expect the drafters of the current version of the policy to see the subtleties of the problem it potentially creates. I would like to be there to explain it to them.

4) Policy: HP6 - Exception Sites

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

At present HP6 is explicitly linked to policy DS1 allow for development of small scale sites to comply with Affordable Housing targets using the policy as an exception to the presumption against development in rural areas. As drafted, it could allow for developers a) to use the Affordable description to build multiple small dwellings, where "all" are affordable or b) build multiple dwellings for "first-time buyers" where the development is less than 1 hectare or less than 5% of the adjacent settlement. As Gosport Borough Council has pointed out, if such developments are near or on the border with Gosport Borough, given the size of Gosport, the 5% provision is meaning less. The inclusion of a link to this policy within DS1 section e allows for the building of multiple small developments in a rural area, with no overall need to comply with a bigger plan, potentially allowing for incremental aggregation of much larger developments in the Fareham - Stubbington Strategic Gap, contrary to the stated aim of Fareham Borough Council

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Removal of the reference to HP6 from Policy DS1 section e as well as rewording of the policy explicitly to make any development affected by it a Fareham Borough development only.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Removing any ambiguity about the location of developments subject to policy HP6, this should protect the Fareham - Stubbington Strategic Gap from the potential for multiple small developments at the borders that may over time aggregate to a significant reduction on undeveloped land there.

Your suggested revised wording of any policy or text:

Policy DS1e) Is for housing development compliant with one of the following policies; HP1, HP2,HP11, or Policy HP6 ... a) The site is adjacent to existing settlements within Fareham Borough; and ...

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I would like to be sure that Fareham Borough Council is fully aware of the subtleties of the policies they have drafted.

5) Policy: E1- Employment Land Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Policy E1, while in itself, bordering on sound, seems to pursue an agenda that is not active in promoting either the government's Green agenda, nor common sense when it comes to climate change. While it is appreciated that any Production Plan shall be as anodyne as possible in order to pass the inspection, it is notable that none of the above policies does anything to suggest that there should be any preference for types of employment that acknowledges the government's Green Agenda and true sustainability. With the UK government's recent suggestion that it wishes to pursue a Green Industrial Revolution, albeit this hasn't yet been put into legislation, the Fareham Plan includes nothing that points to sustainability in environmental terms not supports any environmental agenda or attempt to address climate change. It would have been encouraging to see any of the identified sites, including Daedalus, being suggested as a potential home for green industry, whether manufacture of energy generating technology, environmental remediation, R & D or just green-related consumer business. There is also no mention of Gosport Borough and any collaboration or consultation with them, which I would have thought was a necessity given the effect that any increased employment and movement of people would definitely have on shared infrastructure; transport links, roads etc. While Fareham and Gosport Boroughs' connections via the Solent LEP and PfSH indicate that they may confer, there is nothing in the plan that acknowledged the close interest in Fareham as a means of getting off the Gosport peninsula

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The inclusion of reference to green industry, sustainability or anything that indicates that the Council has a view on Climate change and the need to prepare for it and encourage the developmet of appropriate technologies and solutions.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would correct the overall, complacent tenor of the policy that advocated "business as usual".

Your suggested revised wording of any policy or text:

The Council's evidence base for the Borough's employment growth highlights the need to provide a range of modern good quality floorspace to meet employment forecasts in the Borough. The Council is keen to encourage a diverse range of economic growth, especially in the fields of "green technology and innovation", and this policy will ensure that the needs of new and growing businesses are met, and the Council will work with businesses and other partners to ensure the sufficient supply of quality employment floorspace.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I don't believe the Council will wish to step away from the conventional employment polices that they think have served them up to now. I'd like the opportunity to correct their perception.

6) Policy: E5 - Existing Employment Areas

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

I selected Policy E5 because it is present on the drop-down. I actually wanted to select Policy E7 which Fareham Borough Council has omitted from the drop-down. I hope this omission is not deliberate as I do think Policy E7 needs a challenge.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The removal of the nonsensical reference to an "airport". It is at present an airfield that handles a bearable (for nearby residents) amount of traffic. Fareham Borough Council and the operators of the airfield have applied for up to 40,000 aircraft movements per day; that is approximately 110 per day over 365 days. They also include in their plans the possibility of jet aircraft using the airfield. This presents an unacceptable level of activity on a small airfield bordered closely by residential areas and in a part of the country which the UK government has made clear is not appropriate for further expansion of runway availability.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

By retaining the airfield as just that - an airfield with no idiotic aspirations for be an airport (this area is pretty well served by Southampton, Bournemouth and not so far away London Gatwick) and as an area for economic development that supported a green agenda, using employment space there for production and services that do not involve the use of greater quantities of Jet fuel.

Your suggested revised wording of any policy or text:

The area defined as Daedalus, including the Solent Enterprise Zone, (as shown on the Policies map) will be retained for aviation related uses and employment opportunities including technology and innovation related to the correction of Climate Change and environmental management. It will also continue to support the present level of aviation activities, unless it can be demonstrated that such uses are no longer financially viable.

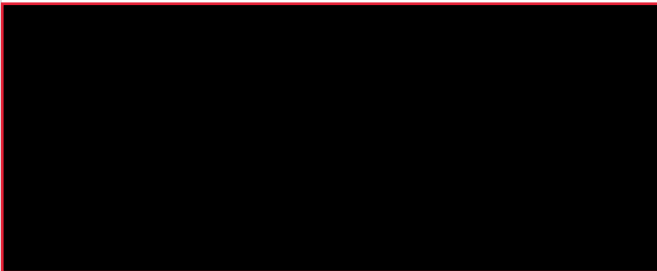
If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The Fareham Borough Council Production plan includes only vestigial references to environmental concerns and climate change remediation and then only in a passive sense. I would like to be able to suggest to the council that as a borough with a coastline they take the environment more seriously to avoid future problems not only for residents, but for neighbours.

Respondent details:

Title:	Professor
First Name:	Richard
Last Name:	Healey
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The plan is not sound because housing allocation policy HA4 (Downend Road East) is not positively prepared. It does not meet the requirements for supporting infrastructure in line with the transport policy. The latter requires an efficient transport network (para 10.1) which facilitates management of network congestion to help achieve consistent journey times (10.3). While policy HA4 outlines plans for improved cycling/pedestrian routes, associated with the large block of proposed new housing, it fails to address the actual geographical context of the area in question and the known severe traffic bottleneck that already exists at peak times at the Downend road/A27 junction, before any development has even taken place. A key underlying problem is the relative isolation of the site, both from major shopping opportunities (Portchester is very limited) and from employment locations, such that use of public transport adds significant commuting time penalties. As a result, a high level of vehicle usage can be expected. When this is added to the large number of planned houses, and the current single planned vehicular exit from the site, onto an already very congested road (Downend Road), the resulting daily delays will be intolerable and the required transport efficiency criterion cannot be met. Multiple planning applications by developers have already been rejected as a result of the failure to address the access and traffic delay problems satisfactorily, and in the face of numerous evidence submissions from local residents (including myself) about the extent of the traffic problems that already exist. Unfortunately, the current Local Plan proposals offer little beyond that which developers have previously proposed, other than vague promises about future improvements in bus rapid transit. Neither the Plan nor developers seem willing to admit that much more substantial, and costly, infrastructure improvements will be needed to make this particular housing development feasible from a traffic management viewpoint, e.g. by creating a second new vehicular exit to the east of the site. Making major and lasting improvements to the traffic flow down the A27 to the Delme Roundabout and on into Fareham, would, in my view, require very substantial infrastructure expenditure at a level that neither the Borough nor Hampshire County Council seem willing to contemplate. Yet at the same time, both are willing to countenance major new housing developments that would add still further to existing traffic congestion, excessive road noise and potentially illegal air pollution levels.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Extensive further investment in road infrastructure to improve access to the HA4 (Downend Road East) from the eastern end of the site and to address knock-on increases in traffic on Downend Road and along to the Delme roundabout and beyond.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

They would enable traffic congestion to be reduced such that efficient and reliably timed traffic movement was possible, even at peak times.

Your suggested revised wording of any policy or text:

add sub-sections iv and v to section L of policy HA4, as follows : iv) create a vehicular road outlet to the east of the site to relieve congestion at the western end (Downend Road) v) re-design the Delme roundabout area to improve traffic flow - this may involve major engineering works, such as new flyover construction with noise mitigation measures

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Blake, Patrick <[REDACTED]>
Sent: 18 December 2020 10:13
To: Planning Policy
Cc: Planning SE; Ginn, Beata; Strongitharm, Glen; Townend, Zoe
Subject: Highways England reg 19 response
Attachments: SF001.004 TN03_ISSUED.PDF

Dear Planning Policy Team

Thank you for inviting Highways England to comment on Fareham Borough Council Regulation 19 Local Plan Consultation.

Highways England's role is to operate, maintain and modernise the strategic road network (SRN) in line with the Roads Investment Strategy, reflecting public interest and to provide effective stewardship of the network's long term operation and integrity. In the case of Fareham Borough Council this relates to the M27. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in Fareham without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When identifying the preferred strategy for the Spatial Options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth in Fareham on the SRN. We welcome further dialogue on potential growth in particular any site in around M27 Junction 11, this would include land close to J11 being promoted for commercial use. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M27. We look forward to discussions to ensure the impacts to the SRN from proposals are considered and an identification of an appropriate package of mitigation measures. It is recognised that the proposed Local Plan will play an important role in delivering planned growth in Fareham.

Please see attached TN03, which is our review of the consultation documents. You will note there are a number points where some clarification would be helpful but these issues do not relate to the soundness of the Fareham Local Plan. Fareham Borough Council have engaged with Highways England at all stages in the development of the Local Plan and have continued to work in collaboration to develop a sound transport evidence base to support the Local Plan. We look forward to continued partnership work as proposals progress.

I hope this is helpful and please do not hesitate to contact me to discuss further.

Kind Regards

Patrick Blake, Area 3 Spatial Planner

Highways England | Bridge House | 1 [REDACTED]
[REDACTED]

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

Technical Note 03

Project:	Highways England Spatial Planning Arrangement 2016-2020	Job No:	60600479 / SF001.004
Subject:	Fareham Publication Draft Local Plan 2037 and Supporting Documents Review		
Prepared by:	Kimberley Pettingill	Date:	9th December 2020
Checked by:	Andrew Cuthbert	Date:	11th December 2020
Verified by:	Liz Judson	Date:	11th December 2020
Approved by:	Andrew Cuthbert	Date:	14th December 2020

Executive Summary

Following a review of the Regulation 19 Fareham Publication Draft Local Plan 2037 and documents prepared in support of the 2037 Fareham Local Plan, AECOM make the following recommendations.

Recommendations regarded as critical to the acceptability of the forthcoming Local Plan

None

Recommendations regarded as important but not critical to the acceptability of the forthcoming Local Plan

1. Clarification should be sought with regards to the housing figures used within the SRTM model (for both the 2036 baseline, and 2036 Do Minimum scenarios). (para 5.9).
2. The SGAs should be removed from the model and a re-run of the modelling undertaken as appropriate. (para 5.10).

AECOM advise Highways England to formally raise the concerns highlighted in this note in the consultation response to the Fareham Publication Draft Local Plan 2037 Draft Transport Strategy and to continue to work with Fareham Borough Council and the other stakeholders to resolve the issues identified.

1. Introduction

- 1.1. This Technical Note (TN) documents a review, carried out by AECOM on behalf of Highways England, of the Regulation 19 Fareham Publication Local Plan (the PLP). The purpose of this review is to understand the impact of the proposed Local Plan site allocations within Fareham on the Strategic Road Network (SRN) and to determine whether sufficient highway infrastructure and mitigation is proposed to accommodate the planned growth.
- 1.2. AECOM have previously undertaken three tasks in relation to the Fareham Local Plan with the initial work being reported in AECOM TN01 and TN02. TN02 documents AECOMs review of the Fareham Local Plan 2036 Supplement document, which set out the plan for future development within Fareham and was an extension of the 2017 Draft LP which had already been consulted on. Within the LP Supplement, the development strategy and housing sections of the 2036 plan had been updated to reflect the increased housing requirements for Fareham. The most recent work reported in Briefing Note BN03 reported on the responses received from the Local Planning Authority and their Consultants to the issues raised in TN02.
- 1.3. The purpose of this review is therefore to determine what has changed within the most recent PLP since the last AECOM review (presented in TN02 and BN03), and to assess whether any of the amendments are likely to have a detrimental impact on the SRN .
- 1.4. The documents, issued by Fareham Borough Council (FBC) for consultation under Regulation 19 (Town and Country Planning Regulations 2012) and included in this review are as follows:
 - Fareham Publication Local Plan 2037;
 - Infrastructure Delivery Plan (IDP) September 2020;
 - Strategic Transport Assessment (Atkins, September 2020) and supporting appendices; and
 - Strategic Transport Assessment SRTM Modelling Report (Systra, August 2020).
- 1.5. The PLP contains strategic priorities, policies and allocations which aim to achieve sustainable development in the Borough whilst also identifying and protecting its valued assets. The PLP sets out what the Council considers are the opportunities for development and policies on what will or will not be permitted and where. The plan aims to ensure beneficial and high-quality development to meet the future needs of its residents, workers and visitors, whilst protecting its most valued natural and man-made assets such as landscapes, settlement character, heritage and community buildings.
- 1.6. The IDP is a supporting document to the PLP. It outlines the existing and planned infrastructure improvements required to accommodate LP growth.
- 1.7. The SRTM report forms part of the evidence base for the PLP, and informs the modelling section of the Strategic Transport Assessment (STA). AECOM have previously reviewed, on behalf of Highways England, both the initial version of the SRTM report (issued July 2019) and the updated version (issued in January 2020). These reviews are reported in our TN01, TN02 and BN03, dated October 2019, February 2020 and April 2020, respectively. Within these reports AECOM made a number of recommendations for additional assessment to be carried out to support the LP.
- 1.8. AECOM will undertake a general high level overview of the Publication Draft of the Local Plan (and relevant supporting documents) to determine whether it is broadly consistent with the Regulation 18 Draft and that nothing significant has been introduced that would be a threat to the SRN.
- 1.9. AECOM will review the latest LP consultation documents listed above against our previous recommendations from TN01, TN02 and BN01 to determine whether these have been addressed. This TN03 will highlight any potential points of concern to Highways England and advise whether it would be appropriate to make any representations to the consultation documents, with a view to protecting the safe and reliable operation of the SRN.

Technical Note 03

- 1.10. The PLP represents the 'Publication' stage of the Local Plan process. It is the result of updating and merging the Regulation 18 Draft Local Plan and Supplement taking into account the changes to national policy and guidance as well as comments received during the consultation exercises. This is the final stage before the Local Plan is submitted to the Secretary of State for independent examination. The Regulation 19 Local Plan consultation period is open until **Friday 18th December 2020**.
- 1.11. For ease of reference, AECOM's main comments and recommendations are presented in bold and underlined text throughout the note. Recommendations regarded as critical to the acceptability of the PLP are coloured **red**. Recommendations regarded as important but not critical to the acceptability of the PLP are highlighted in **amber**.

2. Background

- 2.1. Fareham Borough Council is the Local Planning Authority for a significant area within South Hampshire between the cities of Southampton and Portsmouth.
- 2.2. The development strategy proposed by the Local Plan includes:
- Provision for at least 8,389 new residential dwellings and 104,000m² of new employment floorspace;
 - The strategic employment site at Daedalus (Solent Enterprise Zone) to deliver an additional 77,200m² of employment floorspace over and above that already planned for;
 - Strategic opportunities in Fareham Town Centre that contribute to the delivery of at least 428 dwellings as part of a wider regeneration strategy;
 - Development allocations on previously developed land where available, and on greenfield land around the edges of existing urban areas in order to meet remaining housing and employment needs, but otherwise managing appropriate levels of development outside of urban areas.
- 2.3. Fareham is served by the M27 Motorway, with M27 Junctions 9, 10 and 11 lying within the borough. Highways England are therefore concerned with the impact of planned growth on the safe and free-flow of traffic using the M27 and whether sufficient infrastructure and mitigation is proposed to accommodate this growth.
- 2.4. The Fareham PLP consultation documents (listed in para 1.2 of this TN) have been reviewed in the context of DfT Circular 02/2013¹ and Highways England's 'Planning for the Future' guidance², which provides an outline of matters that will be considered when Highways England are engaged in the local plan process. It states that Highways England will *"seek to provide a recommendation as to the soundness of proposed policies and proposals in relation to their interaction with the SRN"*.

¹ The Strategic Road Network and the Delivery of Sustainable Development.

² The Strategic Road Network: Planning for the Future, A Guide to Working with Highways England on Planning Matters (September 2015).

3. Publication Local Plan 2037

- 3.1. FBC's current adopted local plan comprises three parts as follows:
- Local Plan Part 1 (LP1) Core Strategy (adopted in August 2011);
 - Local Plan Part 2 (LP2) Development Sites & Policies (adopted in June 2015); and
 - Local Plan Part 3 (LP3) The Welborne Plan (adopted in June 2015).
- 3.2. The Fareham Local Plan 2037 will formally replace the adopted LP1 and LP2. Local Plan Part 3: The Welborne Plan will not be replaced by the 2037 plan, but together with the new Local Plan and any Supplementary Planning Documents (SPDs), will make up the suite of planning policies upon which planning applications will be considered.
- 3.3. The Fareham Local Plan proposed plan period will cover sixteen years from the date of adoption, which is anticipated to take place in 2021, the period will therefore extend to 2037. This period differs from that stated in earlier drafts (2020 to 2036) and has been reflected in the plan name which has changed from Fareham Local Plan 2036 to Fareham Local Plan 2037.
- 3.4. Since the most recent AECOM review (reported within BN03), the Government published a new planning consultation (in August 2020) which proposes further changes to the way housing need is calculated. Local housing need should be determined by using the standard methodology set out in national Planning Practice Guidance (PPG). This methodology currently combines 2014-based household projections with affordability data released in March 2020 to calculate the annual need. Using this method, the housing need for Fareham currently stands at a minimum of 514 dwellings per annum (dpa). However, in August 2020, the Government released a consultation on a new standard methodology which affords councils the option of using either a percentage of the Borough's existing housing stock as the calculation's starting point or the most up-to-date household projections, whichever is the higher, before an affordability uplift is applied. FBC therefore considers it appropriate for this Publication Local Plan to plan for a scale of growth based on the proposed new methodology, and not one based on out-of-date household projections. This reduces the minimum housing need figure to 403dpa, based on a base date of 2021, resulting in a total of 6,448 dwellings over the 16 year plan period.
- 3.5. The PLP also makes provision for an additional 847 dwellings over the 16 year plan period, in order to contribute to neighbouring authority unmet housing needs (i.e. within Portsmouth City Council and Gosport Borough Council). Therefore, this results in the total minimum housing requirement as set out in the PLP of 7,295 over the 16 year period.
- 3.6. Policy H1 states that the Council will make provision for at least 8,389 new homes across the Borough during the Plan period of 2021-2037, which allows for a 15% contingency (over the minimum requirement) should delivery on some sites not match expectations.
- 3.7. The LP Supplement previously reviewed by AECOM and reported in TN02 and BN03, stated a requirement for 520 dwellings per annum to be delivered between 2020 and 2036 (totalling 8,320 dwellings). Therefore, the PLP identifies the requirement for an additional 69 houses over the 16 year plan period.
- 3.8. The general locations of the areas proposed for growth are illustrated on Figure 3.1 of the PLP. .
- 3.9. The proposed development sites and growth areas included within the PLP have been compared to those included within the LP Supplement, and AECOM note that there are a number of differences, as outlined in further detail below.

Technical Note 03

Housing Allocation policies

- 3.10. A number of additional small sites are included in the PLP that were not previously included within the LP Supplement (and therefore not considered in AECOMs previous review), these are listed below:
- HA27: Rookery Avenue (32 dwellings)
 - HA28: 3-33 West Street, Porchester (16 dwellings)
 - HA29: Land East of Church Road (20 dwellings)
 - HA30: 33 Lodge Road (9 dwellings)
 - HA31: Hammond Industrial Estate (36 dwellings)
 - HA32: Egmont Nursery (8 dwellings)
 - HA33: Land East of Bye Road (7 dwellings)
 - HA34: Land South West of Sovereign Crescent (38 dwellings)
 - HA35: Former Scout Hut, Coldeast Way (7 dwellings)
 - HA37: Former Locks Heath Filling Station (30 dwellings)
 - HA38: 68 Titchfield Park Road (9 dwellings)
 - HA39: Land at 51 Greenaway Lane (5 dwellings)
 - HA40: Land West of Northfield Park (22 dwellings)
 - HA41: Stubbington Green (9 dwellings)
 - HA43: Corner of Straight Road (16 dwellings)
 - HA44: Assheton Court (60 dwellings, net yield 27)
 - HA45: Rear of 77 Burr ridge Road (3 dwellings)
- 3.11. It is not considered that any of the above sites would be of particular interest to Highways England due to the proposed scale of the development at each site, and the relative remoteness of the sites to the SRN. Therefore, AECOM see no reason for Highways England to object to these additional proposed allocation sites in isolation.
- 3.12. However, Highways England's previous response to the 'Issues and Options' consultation which took place in the summer of 2019 should remain, that *'consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth in Fareham on the SRN'*.

Employment Land Provision

- 3.13. Three employment land sites have been allocated within the PLP, Faraday Business Park (Daedalus East), Swordfish Business Park (Daedalus West) and Solent 2, all previously identified in Local Plan Part 2 and within the LP Supplement.
- 3.14. Policy E2 outlines the details for Faraday Business Park and states an employment space capacity of 65,100m² (in addition to the 28,000m² already consented). This is in excess of the 40,000m² proposed within the LP Supplement and may result in a more significant impact on the SRN than previously reported as part of the LP Supplement evidence base.
- 3.15. Policy E3 outlines the details for Swordfish Business Park and states an employment space capacity of 12,100m² (in addition to the 22,000m² already consented). This is in excess of the 8,000m² proposed within the LP Supplement and may result in a more significant impact on the SRN than previously reported as part of the LP Supplement evidence base.
- 3.16. Sites E2 and E3 are located within the area of Solent Airport, at the southern edge of the Borough, adjacent to its boundary with Gosport, and therefore have a significant local catchment area from which workers can travel without interfacing with the SRN.

- 3.17. Policy E4 outlines the details for Solent 2 and states an employment space capacity of 23,500m² which is the same as proposed within the LP Supplement. This site is almost adjacent to M27 Junction 9.

Strategic Growth Areas

- 3.18. The LP Supplement proposed two Strategic Growth Areas (SGAs) within the Borough of Fareham, which were intended to play a role in meeting the total housing requirement, particularly in relation to unmet need, and were proposed as a result of the introduction of the current standard methodology which is higher than that included in the previous Local Plan. However, as the Government is consulting on a revised standard methodology which would see Fareham's need fall again, these SGAs have not been included within the PLP. The omission of these areas addresses some of the concerns previously raised by AECOM in TN02 in relation to significant amounts of development coming forward in close proximity to M27 Junction 11.
- 3.19. Table 4.2 of the PLP shows that there are sufficient sites to provide 8,389 net new homes across Fareham Borough from 2021 up to 2037, demonstrating that housing supply is in excess of the housing requirement allowing for a contingency should delivery on some sites not match expectations. Slightly under a half (4,020) of the 8,389 are located at Welborne, where there is a resolution to grant planning permission, together with a further 1,390 on sites which are either consented or have resolution to grant status. The PLP therefore proposes a net increase of 2,979 dwellings over the plan period over and above existing commitments.

4. Infrastructure Delivery Plan

- 4.1. The Interim Draft Infrastructure Delivery Plan (IDP) was reviewed as part of AECOMs TN02, and any outstanding concerns following the provision of additional technical material were raised in AECOMs BN03.
- 4.2. FBC have prepared the IDP in support of the PLP, dated September 2020. The IDP identifies current and planned infrastructure across Fareham required to support LP growth. AECOM's review refers to highways and transportation infrastructure only.
- 4.3. Infrastructure associated with the Welborne Garden Village has been identified in the Welborne Plan (LP3) and is not included in the IDP. The main concern raised in TN02 with the IDP was the reliance placed on improvements, at M27 Junction 10 and elsewhere, expected to come forward as mitigation for the development at Welborne. These improvements formed part of the background to the IDP (i.e. it was written on the basis that they were fully committed) and AECOM raised the issue of what would happen if these improvements did not come forward. This question was addressed with the submission of a set of 'without M27 J10' SRTM model runs, the results of which were reported on in AECOM BN03.
- 4.4. The current document states that the IDP has been formulated in consultation with the relevant bodies responsible for each type of infrastructure. It has been developed in two stages. Stage 1 assesses the current overall picture and identifies strategic capacity issues which might influence the development strategy. Infrastructure and service providers were asked to set out any strategic surplus/deficit capacity issues, along with planned projects already in the pipeline.
- 4.5. To undertake the stage 1 assessment, a proforma was circulated to all infrastructure and service providers on the Council's contact database, and respondents were asked to provide information on:
- current capacity or existing levels of use;
 - future capacity (of infrastructure in its current form);
 - planned provision;
 - indicative sources of fund; and
 - timescale for the improvements to be implemented.

Technical Note 03

- 4.6. Stage 2 of the IDP focuses around discussions based on local plan development and site allocations. The objective is to identify the detailed requirements of those potential sites or clusters of sites. Infrastructure and service providers were asked to contribute identifying the requirements arising from the sites as well as the cumulative impacts where possible.
- 4.7. As part of the Stage 2 consultation, Highways England completed a pro-forma which included a table where each LP development site was listed along with details of the infrastructure requirements for each site. The planned strategic highway infrastructure provision is detailed in the 'Highways and Transport Infrastructure' section of the IDP (page 71 relates to the SRN).
- 4.8. Under 'planned provision' the IDP refers to the following current strategic highway schemes in Fareham:
- Smart Motorway Programme for the M27 between Junction 4 (M3 Interchange) and Junction 11 (Fareham);
 - M27 Junction 9 and Parkway South roundabout (an HCC scheme); and
 - M27 Junction 10 improvements (as part of the Welborne development).
- 4.9. Under 'Additional Information of note' the IDP states the following on page 72:
- 'When considering proposals for growth, any impacts on the SRN needs to be identified and mitigated as far as reasonably possible. Highways England will support proposals that consider sustainable measures which manage down demand and reduce the need to travel. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN and infrastructure improvements on the SRN should only be considered as a last resort.'* This statement is consistent with the requirements of Circular 02/2013.
- 4.10. Page 116 of the IDP states *'in allocating land for new development, the Local Plan will need to maintain the function of the M27 and A27 for strategic connectivity in the Solent area and to maintain operational effectiveness of the key corridor. The Council will need to continue to work closely with its partners and stakeholders to develop strategies and facilitate the transport infrastructure that will be identified through the Transport Assessment and other relevant strategies'*.
- 4.11. Section 7 of the IDP identifies the key infrastructure required to specifically support the development set out in the Local Plan to ensure that future development is accompanied by the services and facilities needed to deliver sustainable communities.
- 4.12. Table 6 of the IDP sets out the specific infrastructure required to mitigate the impacts of the sites allocated in the development strategy as put forward by the service/infrastructure providers that were consulted on the overall strategy. Of interest to Highways England are those under the heading 'strategic borough-wide highways junctions'. The junctions needing mitigation as a result of borough-wide local plan growth are identified through the Local Plan Transport Assessment, which is reviewed in Section 5.
- 4.13. Table 7 of the IDP sets out requirements and projects that have been identified through evidence studies and from responses from service providers that apply to sites across the borough. Of interest to Highways England are those under the heading 'TA junctions / off-site highways', which was informed by the Local Plan Transport Assessment, reviewed in Section 5 of this TN.
- 4.14. It is of note that, out of the four junctions previously identified by AECOM as posing a risk to the safe and efficient operation of the SRN, the only junction listed in Table 7 of the IDP is the Delme roundabout, where a Hampshire County Council scheme costed at £9.35M is listed.

5. Strategic Transport Assessment and Sub-Regional Transport Model Report

- 5.1. A detailed review of the SRTM modelling was undertaken as part of AECOM's TN01 and subsequently TN02 and BN03. As such, this review focuses on whether the changes to the LP since the previous review identified in the sections above have been incorporated into the updated STRM modelling (undertaken as part of the STA), rather than a full review of the SRTM methodology adopted. In addition, any outstanding concerns raised as part of the previous reviews have been identified.
- 5.2. AECOM's TN01 documents a review of the July 2019 SRTM Modelling Report which supported the 'Issues and Options' LP consultation in the Summer of 2019. The SRTM assessment was then updated in the January 2020 SRTM Model Output Summary Report to account for the increased housing requirement for Fareham as covered by the LP Supplement, the review of which is documented in AECOM's TN02. BN03 was produced following discussions with representatives of Fareham Borough Council (FBC), HCC and their Consultants Atkins and Systra, and the provision of additional technical material. BN03 outlined two recommendations carried over from TN02 that were still considered outstanding (both regarded as important but not critical to the acceptability of the forthcoming Local Plan). These were as follows:
- Clarification should be provided on the way in which the proposed development 'North of Whiteley' has been incorporated in to the modelling and the nature of the junction improvements assumed to have taken place at M27 Junction 9 in the scenarios modelled (AECOM TN01 para 4.4).
 - The volume / capacity (v/c) plots should be provided in the SRTM Report to gain an understanding of the difference between the 2036 Baseline and 2036 Do Minimum scenarios on the M27 main line (para 5.17).
- 5.3. This information was subsequently provided.
- 5.4. The conclusions reached within AECOM's BN03 were as follows:

'AECOM's review of the results of the modelling undertaken has not identified any obvious showstoppers to the emerging Local Plan as currently proposed and this appears to be the case whether [or not] the major development at Welborne, and its associated improvement scheme at M27 Junction 10, goes ahead.'

However, there are a number of locations at which long queues are predicted, albeit the net increase in queueing attributable to the Local Plan itself appears to be relatively small. In these locations, the impact of Strategic Growth Areas and substantial individual development sites may identify a need for highway capacity-based mitigation measures as the sites concerned come forward through the Planning Application process, with Transport Assessments supported by detailed junction capacity models. In AECOM's view, these locations include the following:

- *The A27 (north) approach to the Segensworth roundabout from M27 Junction 9;*
- *The M27 westbound off-slip road at M27 Junction 11.*

AECOM therefore recommend that the Infrastructure Delivery Plan (IDP) associated with the Local Plan should state a potential requirement for developer-funded mitigation measures at the locations specified.'

It is disappointing that the IDP does not explicitly define such a requirement.

Technical Note 03

5.5. The key changes to the LP, as identified in the sections above are:

- The LP period will run until 2037, rather than 2036;
- The PLP identified the requirement for an additional 69 houses over the 16 year plan period (a total of 8,389), in comparison to the LP Supplement;
- The PLP no longer makes provision for two Strategic Growth Areas (SGAs) within the Borough;
- A number of smaller sites within Fareham Town Centre and elsewhere have been identified as being potential allocations: these are unlikely to be of concern to Highways England;
- The employment space capacity at Faraday Business Park has been increased to 65,100m² (40,000m² was proposed within the LP Supplement); and
- The employment space capacity at Swordfish Business Park has been increased to 12,100m² (8,000m² was proposed within the LP Supplement).

Assessment Scenarios

5.6. The SRTM has a base year of 2015, and forecast years of 2019, 2026, 2031, 2036 and 2041. For Fareham Local Plan assessment, scenarios were forecast to 2036 and scenarios have been developed as follows:

- **Scenario 1** – 2036 Baseline, no Fareham Local Plan development except committed sites. Welborne (4,260 residential units) and M27 Junction 10 included.
- **Scenario 1a** – 2036 Baseline, no Fareham Local Plan development except committed sites. Welborne capped at 1,160 residential units, no M27 10 scheme included.
- **Scenario 2** – 2036 Do-Minimum (Do Minimum), full Fareham Local Plan development without transport mitigation measures, Welborne (4,260 residential units) and M27 Junction 10 included.
- **Scenario 2a** – 2036 Do Minimum, full Fareham Local Plan development without transport mitigation. Welborne capped at 1,160 residential units, no M27 Junction 10 scheme.
- **Scenario 3** – 2036 Do Something (Do Something) full Fareham Local Plan development with potential mitigation measures.

5.7. The above scenarios allow the net impact of the PLP on the key junctions of interest to Highways England to be quantified, whether Welborne goes ahead in full (and brings with it the proposed improvement to M27 Junction 10) or whether it is capped at 1,160 dwellings and does not bring about the M27 J10 improvement.

5.8. The PLP will run to 2037; however, the SRTM modelling has used a future year of 2036. No explanation has been provided within the Strategic TA/ STRM modelling report as to why this is the case. AECOM accept the use of 2036, which is a common year for which runs of the SRTM have been made, as a proxy for the new end-date of the PLP.

5.9. For the purposes of this review, Scenarios 2 and 3 are of most interest, as these are the scenarios where the full local plan development has been included. Table 7-1 of the TA indicates that the modelling assumes an additional 6,051 dwellings over the period 2015 to 2036 with the PLP (Scenario 2) than over the same period in the baseline (Scenario 1). This is further substantiated by comparing Tables 7-3 and 7-4, where the difference between the dwelling totals in the two tables is also 6,051. Table 7-5 of the TA sets out the proposed growth in the PLP between 2021 and 2037 of 8,389 (the figure quoted in the PLP itself), which, once existing commitments (5,410) are deducted, gives a net increase due to the PLP of 2,979 dwellings. There is some difficulty in reconciling these figures because one is for the period 2015 to 2036, and the other, 2021 to 2037. Nevertheless, there does appear to be a significant discrepancy (of 3,072 dwellings) between the modelled figure and the figure in the PLP, given that they both purport to represent the net impact of the PLP over and above existing commitments. AECOM cannot find an explanation for this in the TA and are concerned that the figure used may be excessive and may result in the modelling reporting more excessive delays and queueing than are likely, and potentially presenting an unrealistic prediction of the future operation of the highway network. **AECOM therefore**

recommend that clarification is provided with regards to the housing figures used within the SRTM model (for both the 2036 baseline, and 2036 Do Minimum scenarios).

- 5.10. Paragraph 7.24 of the STA states that the modelling includes the two potential Strategic Growth Areas (SGAs) North of Downend and South of Fareham, and this is confirmed by reference to Figure 7-2, which shows 650 dwellings North of Downend and 1,975 South of Fareham. However, these SGAs are no longer allocated in the PLP. AECOM consider that the inclusion of these sites in the modelling may distort the modelling, potentially mean that the modelling outputs are reporting more excessive delays and queueing on the highway network than is likely, and potentially representing an unrealistic prediction of the future operation of the highway network. It is of note that the inclusion of the two SGAs does not fully explain the apparent discrepancy between the number of dwellings modelled and those now proposed in the PLP. **It is recommended that the SGAs are removed from the model and a re-run of the modelling undertaken as appropriate.**
- 5.11. Paragraph 7.7 of the TA states that the PLP will result in approximately 3,000 additional jobs in the Borough over the period 2015 to 2036. Paragraph 7.23 of the STA states that the employment site allocations shown in Table 7-6 of the STA have been included in the model, which shows the cumulative impact of these expansions. Table 7-6 reflects the same level of employment site growth as identified within the PLP and therefore, on this basis, AECOM agree that the STRM reflects the level of anticipated employment growth identified within the PLP.

Results

- 5.12. The previous AECOM review of the SRTM Report identified the following locations to be of interest to HE:
- Segensworth Roundabout – approach from M27 Junction 9;
 - M27 Junction 9;
 - M27 Junction 11 (including the Boarhunt Road M27 Junction 11 off-slip junction); and
 - Delme Roundabout - approach from M27 Junction 11.
- 5.13. For the purpose of the TA, the following definitions are adopted:
- A 'significant' impact is one where a junction has an RFC of greater than 85% and there is an increase of more than 5% on any one approach arm;
 - A 'severe' impact is one where a junction has an RFC of greater than 95% and there is an increase of more than 10%, or where a delay of greater than 120 second increases by more than 60 seconds per vehicle on any one approach arm
- 5.14. AECOM agree that these are suitable thresholds for identifying junctions likely to be of particular interest in terms of traffic capacity/ congestion effects.
- 5.15. The impact of growth to the 2036 Baseline is illustrated on Figure 8-1 of the TA, where 'severe' impacts are indicated at M27 Junctions 9 and 11 and at the Segensworth roundabout, and a 'significant' impact is predicted at the Delme roundabout.
- 5.16. The net impact of the PLP is illustrated on Figure 9-1 of the TA, where 'significant' impacts are indicated at the Segensworth and Delme junctions and that M27 Junctions 9 and 11 fall below the definition of 'significant'. Whilst M27 Junction 10 is indicated as having a significant increase in traffic flows (TA para 9.5 refers), it does not meet the criteria for a 'significant' impact, presumably because the new layout proposed by the Welborne developer remains within capacity.
- 5.17. Chapter 10 of the TA reports on the results of a sensitivity test in which the impact of the PLP is tested in a scenario in which Welborne is capped at 1,160 dwellings and the improvements to M27 J10 do not take place. These indicate a 'severe' impact from the PLP at the Segensworth roundabout and a 'significant' impact at the Delme, but not at either M27 Junctions 9 or 11.

Technical Note 03

- 5.18. Chapter 11 of the TA sets out proposed mitigation schemes at a number of junctions within the Plan area. Whilst the Segensworth roundabout is indicated as having a 'significant' impact, the arm concerned (Little Park Farm Road) is stated as having a low delay per vehicles and manageable queue length. The problems presented at the Delme roundabout are described at paras 11.40 – 11.42. Mitigation in the form of further signalisation of this roundabout is proposed, with bus lane and bus priority signals, segregated cycle lanes and improved pedestrian crossing facilities. This proposal is said to be at an advanced stage of design and to provide adequate capacity in the AM peak, in the 2036 Do Minimum, with further work required to bring the junction within capacity in the PM peak. However, in the Scenario 3 (Do Something scenario), it returns to being within capacity, with a reduction in flow predicted on the approach from M27 Junction 11. The results tabulated in the Local Junction Modelling Report indicate that the approach from M27 Junction 11 remains within capacity in all scenarios.
- 5.19. In Scenario 3, a 'significant' impact is predicted at M27 Junction 9 on the westbound off-slip. However, this is said (at TA para 12.17) to be soluble by adjustment to traffic signal timings on the A27 junctions with Redlands Lane and Bishopsfield Road.
- 5.20. The SRTM modelling report sets out in more detail the results of the SRTM model runs for the Scenarios tested. Results in terms of predicted levels of queueing on M27 slip roads, and on the approaches to the Delme and Segensworth roundabouts from M27 Junctions 11 and 9, respectively, are exactly the same as previously reported, and summarised in section 3 of AECOM's BN03. This confirms that the modelling undertaken has not been adjusted to reflect the amended housing growth set out in the PLP relative to previous drafts of the emerging LP.
- 5.21. Therefore, no further review of the modelling outputs has been undertaken. The previous recommendations in BN03 still stand. For reference, these included:
- *AECOM's review of the results of the modelling undertaken has not identified any obvious showstoppers to the emerging Local Plan as currently proposed and this appears to be the case whether the major development at Welborne, and its associated improvement scheme at M27 Junction 10, goes ahead.*
 - *However, there are a number of locations at which long queues are predicted, albeit the net increase in queueing attributable to the Local Plan itself appears to be relatively small. In these locations, the impact of Strategic Growth Areas and substantial individual development sites may identify a need for highway capacity-based mitigation measures as the sites concerned come forward through the Planning Application process, with Transport Assessments supported by detailed junction capacity models. In AECOM's view, these locations include the following:*
 - *The A27 (north) approach to the Segensworth roundabout from M27 Junction 9;*
 - *The M27 westbound off-slip road at M27 Junction 11.*
 - *AECOM therefore recommend that the Infrastructure Delivery Plan (IDP) associated with the Local Plan should state a potential requirement for developer-funded mitigation measures at the locations specified.*
- 5.22. The IDP states on page 72, under 'additional information to note' that 'when considering proposals for growth, any impacts on the SRN needs to be identified and mitigated as far as reasonably possible. Highways England will support proposals that consider sustainable measures which manage down demand and reduce the need to travel. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN and infrastructure improvements on the SRN should only be considered as a last resort.'

Technical Note 03

5.23. In addition, Policy TIN2 of the PLP, 'Highway Safety and Road Network' states that:

'Development will be permitted where:

a) There is no unacceptable impact on highway safety, and the residual cumulative impact on the road networks is not severe; and

b) The impacts on the local and strategic highway network arising from the development itself or the cumulative effects of development on the network are mitigated through provision of improvements and enhancements to the local network or contributions towards necessary or relevant off-site transport improvement schemes.'

5.24. Therefore, it is considered that the text contained within both the IDP and the PLP adequately safeguard the SRN by clearly stating that any impacts will need to be identified and mitigated. It is therefore considered that the recommendation at Paragraph 4.6 of BN03 has been adequately addressed.

6. Conclusion

6.1. This TN documents a review, carried out by AECOM on behalf of Highways England, of the Regulation 19 Fareham Publication Local Plan (the PLP). The purpose of this review is to understand the impact of the proposed Local Plan site allocations within Fareham on the Strategic Road Network (SRN) and to determine whether sufficient highway infrastructure and mitigation is proposed to accommodate the planned growth.

6.2. AECOM have previously undertaken three tasks in relation to the Fareham Local Plan with the initial work being reported in AECOM TN01 and TN02. TN02 documents AECOMs review of the Fareham Local Plan 2036 Supplement document, which set out the plan for future development within Fareham and was an extension of the 2017 Draft LP which had already been consulted on. Within the LP Supplement, the development strategy and housing sections of the 2036 plan had been updated to reflect the increased housing requirements for Fareham. The most recent work reported in Briefing Note BN03 reported on the responses received from the Local Planning Authority and their Consultants to the issues raised in TN02.

6.3. The purpose of this review was therefore to determine what has changed within the most recent PLP since the last AECOM review (presented in TN02 and BN03), and to assess whether any of the amendments are likely to have a detrimental impact on the SRN .

6.4. This TA has identified some issues and concerns which should be addressed. These recommendations are listed in the Executive Summary and highlighted by the use of bold underlined text in the main body of this document. Recommendations regarded as critical to the acceptability of the forthcoming Local Plan are coloured **red**. Recommendations regarded as important but not critical to the acceptability of the forthcoming Local Plan are highlighted in **amber**.

6.5. **AECOM advise Highways England to formally raise the concerns highlighted in this note in the consultation response to the Regulation 19 Publication Local Plan 2037 and to continue to work with Fareham Borough Council and the other stakeholders to resolve the issues identified.**

Keely, Lauren

From: Winter, Edward <[REDACTED]>
Sent: 18 December 2020 14:17
To: Planning Policy
Subject: Historic England response
Attachments: 2020.12.18 Fareham local plan reg 19.pdf

Dear Sir or Madam

Please find attached Historic England's response to the above consultation.

Kind regards

Edward Winter LLB MA MRTPI

Historic Environment Planning Adviser

Regions Group (London & South East)

Historic England, Floor 4, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

[REDACTED]



Historic England

By email only to: planningpolicy@fareham.gov.uk

Our ref: PL00049426

Your ref:

Main: 020 7973 3700

e-seast@historicengland.org.uk

Date: 18/12/2020

Dear Sir or Madam

Regulation 19 Local Plan Consultation

Thank you for consulting Historic England on the above document. Our main comments are set out in Appendices 1 and 2 to this letter.

Appendix 1 deals with all policies we wish to make comment on, excluding site allocation policies. Site allocation policies are located in Appendix 2. Appendix 3 is the same set of comments in Appendices 1 and 2, The official forms do not appear to be editable, so we have not used them.

We do not consider our appearance to be necessary at examination on any of the points we have raised, however, we would be happy to attend, should the Inspector request this.

Yours faithfully

Edward Winter

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Appendix 1: Table of Historic England’s detailed comments on the Fareham Regulation 19 Local Plan Policies (excluding site allocations: see Appendix B for site allocations)

Policy/section	Soundness/legal compliance/DTC	Comments	Suggested change
Vision, strategic priorities	Not sound.	We welcome the reference to the continued protection of heritage in the vision, and strategic priorities 3 and 10. These are important elements of the positive strategy for the conservation and enjoyment of the historic environment, which the plan should demonstrate, as set out in NPPF paragraph 185. However, to be consistent with NPPF, and therefore sound , para 185, in Strategic Priority 10, “historical assets” should be replaced with “historic environment”.	In Strategic Priority 10, “historical assets” should be replaced with “historic environment”.
Policy HP1: New Residential Development	No comment.	No comment.	
Design chapter, Policy D1	Sound.	We welcome the characterisation of well-designed, contextual development that is “responsive to local history, culture and heritage”, and the reference to heritage in criterion (i) in Policy D1.	
Strategic Policy DS3: Landscape	Sound.	We support criterion (f) as part of the positive strategy for conserving and enhancing the historic environment	

Strategic Policy HE1: Historic Environment and Heritage Assets	Sound.	We support having a strategic policy for the historic environment and heritage assets and welcome its identification in paragraph 1.35, which lists those policies that are considered to be strategic, in line with NPPF paragraph 21. The inclusion of a strategic policy for heritage complies with NPPF paragraph 20.	
Historic Environment Chapter (general approach)	Sound.	We support the approach the Council has taken, to have separate policies for conservation areas, listed buildings/structures & settings, archaeology, non-designated assets and heritage at risk. The separation of each of these asset-classes provides more detailed policy for each of the identified types of asset, which should be more useful to applicants and decision-makers. The detailed policies are supported by the strategic policy, which also references national heritage policy. NB: Fareham has locally listed parks and gardens, i.e. non-designated assets, but has no registered parks & gardens i.e. designated assets.	
Background paper	Sound.	We welcome the background paper as a useful tool in demonstrating that a suitable evidence base has informed the plan, in respect of the historic environment.	

Appendix 2: Table of Historic England's detailed comments on the Fareham Regulation 19 Local Plan Site Allocation Policies

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
FTC1	Palmerston Car Park	Sound	A number of grade II listed buildings and structures, as well as a conservation area are located near to the site. These assets should be conserved and enhanced. The historic environment policies in section 12 of the plan and criteria c and d in policy FTC1 are considered appropriate for this purpose.	
FTC2	Market Quay	No comment.	No comment.	
FTC3	Fareham Station East	No comment.	No comment.	
FTC4	Fareham Station West	No comment.	No comment.	
FTC5	Crofton Conservatories	No comment.	No comment.	
FTC6	Magistrates Court	No comment.	No comment.	
HA1	North and South of Greenaway	No comment.	No comment.	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
	Lane			
HA3	Southampton Road	No comment.	No comment.	
HA4	Downend Road	Sound	We support criteria (b) and (g).	
HA7	Warsash Maritime Academy	Not sound	<p>We welcome criteria f and g, but we do not consider they go far enough to protect the listed buildings on site. As they stand, we do not consider the policy to be sound, because in offering insufficient protection to heritage assets, in is not consistent with national policy.</p> <p>The policy requirements should make it clear that new development should not be located to the west of the listed buildings. This because the relationship between the River Hamble/Southampton Water and academy is an important element to the significance of the academy.</p> <p>While development to the west of the listed buildings may be less likely, due to the presence of the Area of Special</p>	<p>Change criterion (f) to:</p> <p>“f) Provision of a heritage statement (in accordance with Policy HE3)that assesses the potential impact of proposals on the significance of the Grade II Listed Buildings and their setting; and”</p> <p>Add new criterion:</p> <ul style="list-style-type: none"> “No development should be located to the west of the listed buildings”

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			<p>Landscape Quality and the flood zones 2/3, it is our view that this should be made explicit, through a policy requirement. We recommend adding the following criterion:</p> <ul style="list-style-type: none"> • “No development should be located to the west of the listed buildings” <p>Alternatively, the site boundary could be redrawn, to exclude this area.</p> <p>In addition to the above, the text in criterion (f) lacks some clarity. We are of the view that it should be amended as follows:</p> <p>“f) Provision of a heritage statement (in accordance with Policy HE3) that assesses the potential impact of proposals on the significance of the Grade II Listed Buildings and their setting; and”</p>	<p>Or,</p> <p>“Alternatively, the site boundary could be redrawn, to exclude this area”</p>
HA9	Locks Heath	No comment.	No comment.	
HA10	Funtley Road	No comment.	No comment.	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
	South			
HA12	Moraunt Drive	No comment.	No comment.	
HA13	Hunts Pond Road	No comment.	No comment.	
HA15	Beacon Bottom West	No comment.	No comment.	
HA17	69 Botley Road	No comment.	No comment.	
HA19	399-403 Hunts Pond Road	No comment.	No comment.	
HA22	Wynton Way	No comment.	No comment.	
HA23	Stubbington Lane	No comment.	No comment.	
HA24	335-357 Gosport Road	No comment.	No comment.	
HA26	Beacon Bottom East	No comment.	No comment.	



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
HA27	Rookery Avenue	No comment.	No comment.	
HA28	3-33 West Street	No comment.	No comment.	
HA29	Land East of Church Road	No comment.	No comment.	
HA30	33 Lodge Road	No comment.	No comment.	
HA31	Hammond Industrial Estate	No comment.	No comment.	
HA32	Egmont Nursery, Brook Avenue	No comment.	No comment.	
HA33	Land East of Bye Road, Swanwick	No comment.	No comment.	
HA34	Land South West of Sovereign	No comment.	No comment.	



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
	Crescent			
HA35	Former Scout Hut, Coldeast Way	No comment.	No comment.	
HA36	Land at Locks Heath District Centre	No comment.	No comment.	
HA37	Former Locks Heath Filling Station	No comment.	No comment.	
HA38	68 Titchfield Park Road	No comment.	No comment	
HA39	Land at 51 Greenaway Lane	No comment.	No comment	
HA40	Land west of Northfield Park	No comment.	No comment.	
HA41	22-27a Stubbington Green	No comment.	No comment.	



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
HA42	Land South of Cams Alders	Not sound	<p>Proposed site allocation H42 is one of three sites proposed to be allocated for sheltered housing, in this case for 60 dwellings, the site being 1.29 hectares in total area. The site allocation plan shows the extent of the scheduled area of Fort Fareham, as well as a 50m buffer around the monument. The site allocation area, is located approximately 70m due north of the monument, at the closest point. The site allocation area extends to the north-east and north-west of this point, with an irregular shape.</p> <p>The whole of the proposed allocation is considered to be located within the setting of Fort Fareham. The setting of the fort has already been significantly compromised by development in its setting, as well as within the monument itself. The northern corner of the monument, where the proposed allocation is located, therefore represents the only significant area that remains free from development, and this would have been part of the field of fire associated with the fort. This area does contain a tree belt,</p>	<p>Change criterion (h) to:</p> <p>“h. Provision of a heritage statement (in accordance with Policy HE3) that assesses the potential impact of proposals on the significance of Fort Fareham and through development in its setting, together with an archaeological assessment (in accordance with Policy HE4) and a scheme of mitigation to off-set any harm to the setting of the monument.”</p>

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			<p>which, through blocking the field on fire, also compromises the setting, but as this is not development, we consider this is something that has the potential to be reversed at some point in the future.</p> <p>The allocation text or plan does not make clear to what extent the allocated area would be built upon, but with a stated capacity of 60 dwellings on a site of 1.29 hectares, we presume that no significant areas of the site would be left undeveloped. Therefore it is likely that the proposed development will affect the significance of the monument, through development in its setting.</p> <p>The NPPF states that “[heritage] assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations” (184), and that “great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to</p>	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			<p>substantial harm, total loss or less than substantial harm to its significance” (193). “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification” and “scheduled monuments are considered to be assets of the highest significance” (194).</p> <p>The NPPF also states that “significant adverse effects on [any of the sustainability] objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered) (32).</p> <p>We recognise that the site allocation requires a heritage statement and this is welcome.</p>	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			<p>In the SA of the publication version of the plan, the main reason for the site selection seems to be based on location: the SA asserts that demand for sheltered housing is most likely to occur in Portchester and Fareham South. Presumably, no other suitable sites are suitable, in terms of location (if other sites were available that do not cause significant adverse effects on a sustainability objective, following NPPF para 32, Land South of Cam Alders should not be allocated). However, given that the impact of the proposed allocation is recognised as 'negative' in the high level assessment result, in the historic environment objective, the policy should reflect the NPPF requirement to mitigate, as set out in para 32.</p> <p>Therefore the site allocation should require a mitigation plan to offset harm to the setting of Fort Fareham. Without this, we consider the policy to be inconsistent with national policy and therefore unsound.</p> <p>In addition to the above concern, the</p>	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			<p>policy is also somewhat unclear in terms of its wording, with regard to “conservation and setting...” and “grade II scheduled monument”. Fort Fareham is not a grade II scheduled monument: this classification does not exist. It is both a scheduled monument, AND a grade II listed building. In such cases, the scheduling take precedence. Describing Fort Fareham as a grade II scheduled monument could give the impression that it is not an asset of the highest significance. The reference to “conservation and setting” is considered to lack clarity. We suggest criterion (h) is amended as suggested below, to account for all three of our concerns. Without amendment, we consider the policy to be inconsistent with national policy and therefore unsound, for each of the three reasons we cite.</p> <p>“h. Provision of a heritage statement (in accordance with Policy HE3) that assesses the potential impact of proposals on the significance of Fort Fareham and through development in</p>	

Site ref	Site name	Soundness/legal compliance/DTC	Comments	Suggested Change
			its setting, together with an archaeological assessment (in accordance with Policy HE4) and a scheme of mitigation to off-set any harm to the setting of the monument.”	
HA43	Corner of Station Road, Portchester	No comment.	No comment.	
HA44	Assheton Court	No comment.	No comment.	
HA45	Rear of 77 Burridge Road	No comment.	No comment.	
E2	Faraday Business Park	No comment.	No comment.	
E3	Swordfish Business Park	No comment.	No comment.	
E4	Solent 2	No comment.	No comment.	



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Respondent details:

Title:	Mr
First Name:	Rex
Last Name:	Holford
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 1.5

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 1.5 Legal Compliance A petition which was signed by 2390 residents of Warsash relating to housing numbers (now 1001) was ignored by the council. A road traffic census conducted by residents was considered inadmissible by FBC as it contradicted the HCC electronic census which HCC themselves considered inaccurate. Discrimination on the part of FBC, siding with developers and opposed to residents. Para 1.16 the number of new homes proposed across the borough is 1342 which gives an unfair distribution for HA1 as it will be allocated 62% of this figure in a 1.7 mile stretch of Brook Lane. This is a physical impossibility for this Lane but FBC will not entertain this.. Test of Soundness Para 10.15 Fragmented Transport plan. No analysis of the road structuring. Will the number of exits on to a particular road cause more congestions? this has not been considered. Brook Lane being the worst case with over 2000 extra vehicles trying to exit onto the A27 at peak periods. HHC have not been asked to comment on this problem.. Para7.13 No plan has been proposed for additional retail/commercial facilities in the the area to accommodate the additional people from the new dwellings. Locks Heath Centre is a small shopping outlet and is having difficulty in coping with the present volume of customers. Similarly there are few jobs available in the area so it will be necessarsary to commute, by car, north of the M27 Para 10.28. Education all the schools in the area are at maximum capacity and no short term solution has been found. Para10.26 No immediate plans are in place for additional medical facilities to cope with the influx of people Duty to co-operate At no time has FBC discussed the HA1 project with HCC in its entirety as they feel that they will be overruled, therefore there is no point in starting a dialogue.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

A complete rethink of the attitude of the FB Planning department with respect to best use of the facilities available. Not to be driven by the Developers wishes

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Ensure that the Planning Department considers all aspects relating to the area including it's geographic position.


Your suggested revised wording of any policy or text:

None

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Vivian
Last Name:	Holt
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA45 - Rear of 77 Burr ridge Road

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Fareham Borough Council have failed to consult local residents and Community Organisations as required by Law and stated in their March 2017 Statement of Community Involvement. Para 4.1. In recent communications with other residents on this road we were astounded to find that no-one had heard of this Policy. Even the residents immediately adjoining the site have not been consulted. The local Burr ridge & Swanwick Residents Association, well known to Fareham Borough Council, has not been advised. We could find no reference to it in any of the issues of the Fareham Today broadsheet used to inform us of other parts of the plan. It was not in any publically available SHELAA and no attempt has been made to publicise it since its addition date 01/07/2020 after the Regulation 18 consultations concluded. It is not reasonable to expect individual residents to read documents of 230/280 pages in order to discover an issue in their immediate locality.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Deletion of Policy HA45 and associated SHELAA site 3138. If it remains in the Local Plan a subsequent Planning Application would be difficult, if not impossible to refuse. It is not fair to include this in the plan without consultation.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Deletion would enable a period of consultation and research into allocation of another site or sites in more suitable locations such as Brownfield.

Your suggested revised wording of any policy or text:

Simply delete the Policy HA45

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Paragraph: 5.99

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

FBC failed to consult local residents and Community Organisations as required by Law and stated in their March 2017 Statement of Community Involvement. Para 4.1. Please refer to my representaion on HA45.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Delete the last sentence: This identified need is to be met through the allocation of land to the rear of 77 Burrridge Road in Policy HA45, which was promoted to the council as part of the Local Plan preparation.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Deletion would enable a period of consultation and allocation of a different site or sites.

Your suggested revised wording of any policy or text:

Replace last sentence with: "This identified need cannot be met from sites currently identified as suitable due to lack of time for proper consultation and difficulties carrying out proactive searches for sites partly due to the Covid 19 epidemic. However it is felt that this should not delay presentation of the Local Plan."

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Paragraph: 5.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

In my view Fareham Borough Council has failed to comply with Procedure Guide for Local Plan Examinations with respect to paragraphs 10.9 & 1.10. In particular that "plans which allocate sites for development will need to be supported by evidence demonstrating that the LPA has followed a logical and consistent method to identify and select the allocated sites, and to reject alternatives." FBC has also failed to comply with the NPPF para. 61 Note 25 4.h. (location is inappropriate), i. k and 7. (There has been no community involvement.)

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Delete paragraph 5.100 from the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Make proper consultation possible

Your suggested revised wording of any policy or text:

None

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Paragraph: 5.101

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

This paragraph misrepresents the Inspectors views. Appeal ref: APP/A1720/W/18/3209865 the Inspector says in para. 11.“ the backland siting of the proposed dwelling would be incongruous and there would be material harm to the character of the area”. The inspector also concludes in Para. 12 “ I therefore find conflict with CS Policy CS17 and LPP2 Policy DSP40 insofar as they seek development which is respectful of the key characteristics of the area and sensitively designed to reflect the character of the neighbouring settlement.” In paragraphs 13-19 the inspector addresses the SINC and BMES and concludes. “...there would be irreversible loss of semi-mature grassland and therefore harm to the SINC designation. There would be conflict with the development plan and the Framework as a result.” This is also the view of the previous inspector in APP/A1720/A/13/2191454 in which he approved use of a small part of the field but made conditions including restricting the site to 1 pitch. The proposal and rationale to use this site is unsound as it ignores the presence on a Gipsy & Traveller Site of large caravans and vehicles, which are often commercial, in addition to the Day Rooms and possibly Mobile Homes. There simply isn't space on this small site for the hardstanding required for these and landscaping. It would be totally out of keeping with the local area

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Delete paragraph 5.101

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Removal of misrepresentation and unsound site appraisal from the plan.

Your suggested revised wording of any policy or text:

None

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Mark Behrendt [REDACTED]
Sent: 17 December 2020 14:05
To: Planning Policy
Subject: Fareham Local Plan
Attachments: HBF rep Fareham Reg 19 Dec 2020.pdf

Please find attached our representation on the Fareham Local Plan 2037. I would be most grateful if you could confirm receipt of these representations.

Regards

Mark Behrendt
Local Plans Manager SE and E



HOME BUILDERS FEDERATION

[REDACTED]

a: HBF House, 27 Broadwall, London SE1 9PL



HBF London Office closed

Due to the coronavirus the HBF office is temporarily closed.

All HBF staff are contactable via the usual channels and business will continue as near to normal as possible.

This e-mail is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately.

Whilst we run anti-virus software on all Internet emails we are not liable for any loss or damage sustained as a result of software viruses. The recipient is advised to run their own anti-virus software.

Registered in England and Wales | Registered office: 27 Broadwall, London, SE1 9PL
Company Reg No. 276 4757 | Vat No. 882 6294 86

Sent by email to: planningpolicy@fareham.gov.uk

17/12/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Fareham Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the Fareham Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

We would like to submit the following representations on the Local Plan, and we would welcome, in due course, participating in hearings of the Examination in Public.

Duty to Co-operate

2. We note that the Council is part of the Partnership for South Hampshire and has worked closely with these authorities in determining housing needs and examining opportunities as to how these needs could be addressed. The Local Plan outlines at paragraph 4.4 that there are likely to be significant unmet needs arising in Portsmouth and in response to this the Council has identified a further 847 homes to meet needs. Whilst this increase is welcomed, we are concerned that it does not seem to reflect the scale of the unmet needs identified by the Partnership for South Hampshire (PfSH) of over 10,000 homes. So, whilst the Council appears to have co-operated with its neighbours on the issue of housing needs, we are concerned that its contribution is insufficient when considered against the scale of the issue at hand. It would also be the case that this contribution has been made solely as a result of the Council using the standard method as proposed in the most recent Government consultation, and which to date has not been adopted, that significantly reduces the minimum number of homes to be planned for in Fareham. So whilst it would appear that the Council has co-operated with its neighbours in relation to the legal requirements set out in the Localism Act, the outcomes of that co-operation are insufficient to address the cross boundary issue that has been identified – an issue we will come to in relation to policy H1.



Policy H1 - Housing Provision

This policy is unsound as it is inconsistent with national policy

Housing needs

3. The Council are clearly aware that the housing requirement within the policy H1 is inconsistent with national policy as it is based on a standard method that has not been adopted by the Government. Whilst we recognise the Government were out to consultation on an alternative approach it was by no means certain that it would be adopted. The uncertainty as to the standard method has now been addressed with the Government publishing its latest Planning Practice Guidance which states at 2a-004 that the Government has retained the 2014-based household projections as the baseline estimates for household growth within the standard method.
4. The application of the standard method as set out in the most up to date guidance would require the Council to deliver 514 new homes each year. As such the 403 dwellings per annum local housing needs assessment is not consistent with planning policy as it currently stands. We hope a similar degree of haste will be taken in adopting this figure as was taken in moving forward with the lower assessment of needs in Fareham. In addition to this issue, we have three further concerns with regard to policy H1, which are:
 - The policy does not include the Council minimum required level of housing delivery;
 - The degree to which unmet needs in neighbouring areas has been taken into account;
 - Whether economic growth aspiration for the south Hampshire area will be supported to proposed levels of housing delivery; and
 - Plan period and past under delivery.

The housing requirement

5. Policy H1 does not set out the minimum number of homes the Council is required to deliver. Rather it sets out the number of homes that are expected to be delivered by the local plan. It is important that the Council sets out in H1 the minimum number of homes it is required to deliver in order to monitor its performance in meeting this requirement with regard to both the five year housing land supply and the housing delivery test. As set out in table 4.1 of the local plan this figure should be the local housing need figure plus any unmet needs within a neighbouring area that the Council has agreed to take.

Unmet needs

6. Paragraph 60 of the NPPF states that “*any needs that cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for*”. As we note above the Council has, to some

extent, taken account of unmet needs across the south Hampshire sub-region and in response has stated that it will provide a further 847 homes. However, this is a very modest contribution to what is a very high level of unmet needs in the south of Hampshire. The Council state in paragraph 4.4 of the local plan that, based on the current standard method, unmet needs across the sub region of South Hampshire are in the region of 10,750 dwellings. Whilst we recognise that this will change with regard to the amended standard method and as new plans come forward it is unlikely to reduce substantially given that Boroughs such as Portsmouth, Havant, Gosport and Southampton have tight boundaries which will limit any scope for significant increases in provision. Considering the scale of the unmet needs Fareham's decision to contribute just 847 homes to the current shortfall is insufficient.

7. What is evident from the consultation on the Local Plan 2036 supplement was that the Council clearly considered it possible to deliver well above what is being proposed in the published Local Plan 2037. For example, paragraph 3.5 of the supplement to the Local Plan 2036 outlines an annual housing requirement for the Borough of between 572 and 598 homes per annum between 2020 and 2036. This annual rate of delivery would deliver between 9,000 and 9,500 homes over 16 years. It goes on to identify potential sites that could be allocated to support this higher level of delivery.
8. However, the Council has not considered as part of the preparation of the published Local Plan 2037 whether more could have been done to address unmet needs of other areas. In particular we would have expected a higher level of delivery beyond what is proposed in the published local plan to have been considered within the Sustainability Appraisal. However, this issue of unmet needs and increased delivery beyond what is being proposed in policy H1 is not mentioned in the SA published in November 2020 as part of this consultation. As such the Council cannot say whether or not a higher level of housing delivery, which would have done more to address unmet needs across the sub region was a more sustainable approach compared to the chosen strategy. This is not only a concern regarding the soundness of the Council's approach to unmet needs but also the efficacy of the SA that has been prepared to support this local plan.

Growth strategies

9. Paragraph 2a-010 of Planning Practice Guidance (PPG) outlines that there will be circumstances where it is appropriate to plan for a higher housing figure than that identified through the standard method. One of these is where an authority has agreed to take on the unmet needs of another area as discussed above however other situations are identified where housing need may exceed past trends. These include:
 - Deliverable growth strategies
 - Strategic infrastructure improvements likely to drive an increase in homes

10. The Council is clearly committed to economic growth as stated at paragraph 6.1 of the publication local plan but notes at paragraph 6.7 of the Local Plan 2037 that whilst PfSH is committed to reviewing employment requirements published to support the spatial position statement this will not be intine to support this local plan. Due to the absence of this sub regional assessment of employment growth the Council have undertaken its own assessment of the likely increase in jobs over the plan period. The Business Needs, Site Assessment and Employment Land Study (BNSAELS) states at paragraph 6.23 that between 2018 and 2036 it is estimated that a further 4,600 jobs will be created in Fareham. This equates to annual growth in employment from the current baseline of 48,000 jobs of about 0.5% per annum (pa) which is lower than the 0.8% pa jobs growth forecast in the PfSH SHMA update published 2016¹. This higher level of growth would see the number of jobs in the Borough grow by around 6,900 over the same period as that assessed in BNSAELS. However, no detail has been provided by the Council as to whether the level of housing delivery within Fareham will meet these employment growth expectations let alone whether the wider jobs growth expectations of the sub region will be met.
11. The Strategic Housing Market Assessment published by PfSH in 2016 indicated that between 2011 and 2030 that 4,630 homes were needed each year between 2011 and 2030 to support the expectation that there would be 86,300 additional jobs across South Hampshire. However, housing delivery during this period as set out in Table H1 of the Spatial Position Statement indicates growth of around 4,536. Whilst the shortfall is relatively small across the whole sub region, given that the Council have noted at paragraph 4.5 that both Portsmouth and Gosport will struggle to meet their needs going forward it will be important, prior to submission, for the Council to consider with its partners in the PfSH whether sufficient housing will be provided to support these sub regional growth expectations, or whether further allocations are needed in relatively less constrained areas such as Fareham.
12. If insufficient housing is provided in sub-region, we are also concerned that higher levels of in-commuting will be required in order to support the expected levels of employment growth. This would be inconsistent with paragraphs 102 and 103 of the NPPF which require Council's to consider how they can deliver patterns of growth that seek to limit the need to travel. This is an issue that will also need to be considered by the Council and its neighbours prior to submission of the local plan.

Plan period and past under supply

13. There are also other impacts from the application of the standard method that have not been taken into account by the Council. In particular the Council have not grappled with the issue of under supply from the point at which the standard method was introduced in 2018. Planning Practice Guidance states in relation to

¹ Page 56 of the 2016 SHMA

this:

“Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate”.

14. As the Council commenced preparation of this local plan in 2017 it is important that and the Council consider housing completions from the introduction of the standard method compared with the level of local housing need from that point. We recognise that the Standard Method takes account of backlog but only in so far as the affordability ratio will have worsened in the years prior to the calculation and does not take account of under provision since then. In these terms, the shortfall between the assessed level of housing need by reference to the Standard Method and actual completions has to be taken into account going forward.

Year	Number of completions/ projected completions	Local housing need	Shortfall
2018/2019	290	520	230
2019/2020	263 ²	520	257
2020/2021	132 ³	520	388

15. The table above indicates in the three years since the Standard Method was first published, the cumulative shortfall in housing completions is expected to be 875. No consideration is given to these unmet needs in the published plan and even if the lower figure of 403 was taken as the level of local housing need, the shortfall would be in excess of 500 new homes.
16. As housing delivery in the Borough has been below both its requirement in the Core Strategy and the measure of local housing need derived from the Standard Method the Council are wrong to have selected a plan period and housing strategy that takes no account of this. It is the antithesis of positive planning and as such we would suggest that the plan period be revised to start from 2019/20 which is the base date from which the affordability evidence is taken.

Housing land supply

17. The HBF would not wish to comment on the merits or otherwise of individual sites selected for allocation but it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall housing land supply, five-year housing land supply and housing trajectory are correct and realistic. These assumptions should be supported by parties responsible for the delivery of housing and sense checked by the Council using historical empirical data and local knowledge. We note that the Council has

² Fareham BC Authority Monitoring Report 2018/19 (February 2020)

³ Fareham BC Five-year housing land supply position report (June 2020)

included a housing trajectory at appendix B of the local plan as required by the NPPF. However, for the purposes of transparency and effective scrutiny of this trajectory it is necessary for the Council to set out in its evidence base trajectories for each of the sites that make up supply across the plan period. We could not find this evidence, and in our experience, it is both helpful to the inspector examining the plan as well as those making representations.

18. We note and welcome the contingency between the Council's requirement and the number of homes it expects to be delivered over the plan period. It is important that there is a significant contingency to take account of any delays in the delivery of key sites or overestimates in the amount of windfall expected in any plan to ensure that development needs are met in full. As such should the eventual standard method adopted by the Government see housing needs increase in Fareham, we would expect to see this level of contingency within the Council's land supply maintained. Similarly, the Council would probably need to allocate further sites of one hectare or less to ensure it meets the requirement set out in paragraph 64 of the NPPF.

Conclusions on H1

19. The policy is not sound as considered on the basis that:
 - It uses a standard method for assessing housing need that is still out to consultation and potentially subject to change. However, we recognise that the situation is in a state of flux at present and as such recommend the plan is not submitted until the Government have finalised any changes to the standard method;
 - It fails to take sufficient account of the scale of the unmet needs identified within neighbouring areas as required by paragraph 60 of the NPPF;
 - Does not consider whether housing growth will be sufficient to support its economic growth expectations and the impact this would have on in commuting and the need to promote sustainable patterns of growth as required by paragraph 103 of the NPPF.

HP2: New Small-Scale Development outside the Urban Areas

The policy is not sound as it is not consistent with national policy.

20. The HBF's preference would be for the Council to identify appropriate sites and allocate them within the local plan. This would provide the certainty that small developers seek with regard to bringing such sites forward. However, in lieu of allocation the overarching principle of this policy and its aim to support small and medium sized housebuilders and those seeking self-build plots is supported.
21. But we would suggest that at present the policy is not consistent with national policy as it could lead to sites not making the most efficient use of land as required by paragraph 122 of the NPPF. There will be situations where such sites on the edge of urban areas could be developed for more than 4 units without any adverse

impacts. We would therefore suggest that the threshold be increased to 10 units in order to reflect the definition of minor development as well as being consistent with the Government's approach to affordable housing contributions on small sites as set out in paragraph 63 of the NPPF.

Recommendation

22. Part 5a of policy HP2 be amended as set out below:

- a. Of not more than 4 10 units; and

Policy HP4: Five-year housing land supply

Part d of this policy is inconsistent with the NPPF

23. The HBF supports this policy, however we would suggest that the phrase "*in the short term*" in part d is unnecessary as the meaning of deliverable with regard to local plans is clearly defined in the glossary of the NPPF. The inclusion of the phrase short term could cause unnecessary confusion for applicants and decision makers.

Recommendation

That the phrase "*in the short term*" is deleted from part d of policy HP4.

HP5 – Provision of affordable housing

The policy is unsound in its consideration of the percentage requirement for affordable home ownership and with regard to its treatment of older peoples housing which is unjustified

24. Firstly, the policy requirement regarding affordable home ownership is inconsistent with paragraph 64 of the NPPF which expects 10% of all homes on major development involving housing provision to be available for affordable home ownership. Footnote 29 then confirms that these homes are then included as part of the affordable housing contribution. For example, on a site of 100 homes paragraph 64 of the NPPF would require at least 10 homes to be available for affordable home ownership, equating to 25% of the affordable housing delivery on a greenfield site. The Council's policy at present only requires 10% of all affordable housing to be available for affordable home ownership. The Council's policy would require such development to deliver 4 homes for affordable home ownership – just 4% of total delivery on that site. This inconsistency with national policy should be amended.

25. Secondly, whilst we welcome the decision to vary rates within the Borough to reflect viability, we are concerned that despite the evidence the Council will still, seemingly, require specialist development for older people to support the delivery of affordable homes. In section 6.6 of the Viability Study it is clear that both

sheltered housing and extra care housing for older people are not viable at any level of affordable housing. It is therefore surprising that the policy has not removed the requirement for such accommodation to contribute towards the provision of affordable housing.

Recommendation

26. That policy HP5 to be amended as follows:

- To reflect paragraph 64 of the NPPF
- To state that specialist residential accommodation for older people be exempt from providing affordable housing.

HP9 – Self and Custom Build Homes

The policy is unsound as it has not been justified

27. Whilst the HBF support the encouragement of self-build housing through the local plan, we do not consider the requirement for sites of over 40 to set aside 10% dwellings to be delivered through serviced plots for self and custom house building to be justified or consistent with national policy.
28. Firstly, the evidence with regard to the demand for, and supply of self-build plots would suggest that a significant proportion of demand for self-build in Fareham will be met through windfall sites. As the Council note in paragraph 5.8 of the Self and Custom Build Background Paper the demand for self-build plots arising within the first base period of the self-build register was addressed through windfall and it would seem that a similar result will occur within the second base period. Therefore, to suggest that 10% of all development over 40 units are required as self-build is not justified as it would seem that the Council through normal development management process is supporting sufficient plots to come forward without recourse to the impositions being proposed in policy H9. In addition, policy HP2 will also support the delivery of additional sites that will clearly be attractive to both self and custom build housing. Whilst the Council may not want to be dependent on windfall development if this approach is meeting identified demand then there is no need to require such plots to be provided on other sites.
29. Secondly, we welcome the Council's review of the self-build register. From this review it is clear that of the 79 people on the register only 56 people are actively pursuing the possibility of building their own home. In addition, only 40 of those said they would consider a plot on a larger self-build development. Even then it is not clear from these answers whether they would be looking for a plot on major housing building site or would prefer a site solely devoted to self-build plots. As such we are concerned that there is not a significant demand for plots on larger housing being developed by housebuilders and that the 10% requirement in HP9 is unjustified.

30. Finally, it is also important to recognise that paragraphs 57-024 and 57-025 of the PPG sets out a variety of approaches that need to be considered – including the use of the Council's own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We would suggest that rather than place additional burdens on house builders for the provision of self-build plots it should utilise its own land or seek to engage with landowners to identify suitable sites on which to deliver serviced self-build plots. Indeed, it would appear from paragraph 5.14 of the Self and Custom Build Background Paper that such an approach has worked in Fareham.

Recommendation

31. That policy HP9 is deleted.

Policy NE2: Biodiversity Net Gain

32. The Council have included the Government's suggestion that new development should improve the biodiversity on their site to show a 10% net gain over the pre-development baseline within this policy. Whilst we recognise that this is the Government's current position favoured position it is likely that there will be transition period to allow the development industry to adapt to the proposed changes. As such we would suggest that the Council remains consistent with paragraph 170 of national policy to seek net gains in biodiversity and not include the requirement to show a 10% net gain. A policy without a specific percentage requirement would be consistent with current policy and should the relevant legislation be enacted as currently proposed such a policy would be sufficiently flexible to support a 10% requirement and any transition period.

Recommendation

33. That the 10% requirement be deleted.

Policy NE8: Air Quality

The policy is unsound as it is not justified

34. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. It is the industry's preference for a national approach to the provision of charging points rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.

35. The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.
36. Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances the additional costs are likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.
37. As such we would suggest that the requirement for EVCPs should be deleted because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.

Recommendation

38. Part A of the third paragraph within policy NE8 is deleted.

D4: Water Quality and resources

The policy is unsound as it is not consistent with national policy.

39. The final sentence of policy D4 is inconsistent with paragraph 16 of the NPPF which requires policies to be unambiguous and evident as to how the decision maker should react. The policy as written could lead to applications being refused by decision makers on the basis that a development does not achieve a standard that is higher than the maximum requirement that can be applied through the adoption of the optional technical standards.

Recommendation

40. The final sentence of this policy is deleted.

D5: Internal Space standards

The policy is unsound as it has not been justified

41. Policy D5 requires development to meet national spaces standards as a minimum. Whilst the HBF share the Council desire good quality homes delivered within Fareham we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but which would allow on lower incomes can afford a property which has their required number of bedrooms.
42. Given the poor affordability of property in the area and the tight constraints on development it is therefore important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy. However, as the Council note in paragraph 11.59 of the publication local plan most new homes in Fareham are built to a size that is consistent with the nationally described space standards. The only inconsistency they note is that the smallest bedroom often fails to meet the space standards. This evidence does not suggest that there is a pressing need for the introduction of space standard within Fareham but does indicate that requiring larger bedrooms could reduce the number of smaller homes with three or four bedrooms.
43. The HBF is not aware of any evidence that market dwellings in Fareham that do not meet the NDSS remaining unsold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The 2019 Survey demonstrates that 91% of new home buyers would purchase a new build home again and 89% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.
44. Given that there is little to suggest that development below space standards is an endemic concern within Fareham we would suggest that policy D5 is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.

Conclusion

45. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, for the following reasons:

- Failure to give sufficient consideration to the housing needs of neighbouring areas and the consequences on the delivery of sustainable development across south Hampshire;
- Housing needs have not been assessed in accordance with standard methodology as set out in PPG;
- Policy H2 inconsistent with national policy with regard to making the most effective use of land;
- Policy HP5 fails to include exemption for older people's housing in line with the Council's viability evidence;
- Requirement for 10% of plots on sites over 40 units be allocated for self-builders is unjustified;
- The adoption of the nationally described space standards in policy D5 has not been adequately justified.


We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547

Respondent details:

Title:	Mrs
First Name:	Rosemary
Last Name:	Hutton
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: BOROUGHWIDE POLICIES (HP4, HP10, H1, E1, R1-4, CC1-4, NE1, NE3-6, NE8-10, TIN1-2, D1-3, D5, HE1, HE3-6)

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

As far as I can see the provision of emergency services will decline, as their current sites in Fareham will be built on, with no mention of relocation. The roads in and around Warsash, Locksheath and Titchfield were not built to support the obvious increase in use, and as for the provision of medical support, in particular Doctors and Dental surgeries, current residents struggle to get an appointment in the foreseeable future, what hope is there for the influx these plans intend us to put up with. It seems to me a great deal of attention is being paid to squeezing in as much accommodation as possible, with very little thought being given to the people who do and will live within the western wards. This may appear to be the wrong forum to voice my concerns, but it will be too late further down the line, once these communities start expanding no one will want to know. Thank you for giving me the opportunity to voice my very real concerns.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Clear provision of all the aforementioned points

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Self explanatory

Your suggested revised wording of any policy or text:

Reassuring text that local essential services, as previously stated will incorporate not just improvement to the present woefully inadequate services, but provision for the influx of residents the plans are for.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	James
Last Name:	Ireland
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 1.5

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Statement of Community Involvement states a variety of methods, should be used to solicit comments from the public. Because paper based documents failed to be employed across the borough a large proportion of residents were deprived of sharing their opinions. This has been exacerbated by covid restrictions, limiting the access to council offices and libraries. Since 2017 Residents concerns have not been considered regardless of protest marches, deputations and objections raised. For example, despite a petition exceeding the prerequisite number of signatures required to trigger a full Council meeting debates, such debate was refused even after a challenge was raised to the Council's Scrutiny Board. It is discriminatory that community-generated evidence carries less weight than that provided by Developers consultants. e.g regarding previous use of land in Nitrate budget calculations similarly with traffic survey results captured by Residents and Community Speedwatch teams.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The Local Plan consultation should be extending into 2022 to take account of Covid and the lack of possible consultation. The Petition raised in 2017 and that met the required prerequisite of numbers should be debated at a Full Council Meeting. Residents and community generated evidence should be noted and listened to, despite many objections to an an exception increase in building dwellings in Warsash there has been no decrease in the level of proposed building in fact the opposite, there is now an increase.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

This would ensure that community involvement was being listened to and legally compliant by FBC.

Your suggested revised wording of any policy or text:

The Plan for Warsash dwellings is reduced to 420 to take account of residents and the community involvement. (I am not a lawyer or media consultant and do not see why I am being asked to revise the wording of any policy)

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Jonathan
Last Name:	Isherwood
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA4 - Downend Road East

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The site allocation HA4 is flawed. It is a giant cul-de-sac with insufficient access. Unfortunately Fareham Planning Department have prescribed principle access via a single country road that goes over Downend Road railway bridge, an ancient narrow bridge that is not suitable for the anticipated traffic demand. A developer has submitted 2no failed applications that have failed due to this recommended route. The planners needs to prescribe alternative primary access. This should be via a new road from the development to the motorway junction. Adopting the local Veola trunk road would be a potential solution. Prescribing Downend Road as the primary access leads developers to presenting unsuitable schemes, given the unsuitability of the railway bridge and the associated traffic/pollution problems on the A27.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Prescribing alternate primary access to the site. Potentially via the Veola trunk road. A secondary access needs to be found to the east of the site. It is absurd that traffic destined for the east of the development would need to take a 1 mile detour to travel less than 0.25 miles

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would help to mitigate the effect on the existing traffic problems currently experienced at the Downend Road

Your suggested revised wording of any policy or text:

"(c). Primary highway access shall be focused on Downend Road; and " should be changed to "(c). Primary highway access shall be focused on a new access road to be provided to J11 of the M27; and"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Peter
Last Name:	Jackson
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA Allocation should be removed from the development plan. HA32 is an allocation in the HambleValley Area of special landscape quality. Inclusion of HA32 contradicts paragraph 3.9. HA32 is the subject of Judicial Review because it did not comply with the extant plan. Nitrate mitigation relies on untenable assumptions and the application does not include land needed to reach the public highway.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 allocation.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation.

Your suggested revised wording of any policy or text:

Remove HA32 allocation.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Richard
Last Name:	Jarman
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 5.24

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

olicy HP4 (Para 5.24) HA1 fails to meet criteria e) as the proposal would demonstrably have unacceptable environmental, amenity and traffic implications. Policy HA1: Page 51 refers to traffic routes and despite recommendation to limit access to 6 dwellings on Greenaway Lane, the plan proposes for up to 140 dwellings to use this as access through a widening of the Lane. This will result in a considerable negative impact on the character of the lane and to the safety of its non-vehicular users. In general, Page 54 suggests 7 new accesses onto the already very busy Brook Lane and Lockswood Road, as well as one additional access at Brook Lane, via 3 entry points from Greenaway Lane. The position and proximity of these access points will be a recipe for serious gridlock and accident blackspots. Para 10.15 Transport plan does not include an analysis of streets where the majority of the houses are proposed. Why, when there are 830 new dwellings proposed, hasn't more consideration been given to HA1 in the transport assessment. With an average of 2 cars per dwelling, an additional 1660 vehicles will be on local roads and there is no reference for the mitigation required to reduce congestion by 2037. The Plan fails the Test of Soundness by not being Positively Prepared in this respect. Para 10.14 The Local Plan Strategic Transport Assessment at Para 14.16 reads; "In conclusion, based on the work of this Strategic Transport Assessment, it is considered that the quantum and distribution of the development proposed in the Fareham Local Plan, and the resulting transport impacts, are capable of mitigation at the strategic level, and that the plan is therefore deliverable and sound from a transport perspective." This statement doesn't include the area HA1, of the local plan with 830 homes and isn't assessed within the The Local Plan Strategic Transport Assessment document. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan?

Policy HA1 (currently a Greenfield site), is proposed to be re-designated as an urban area (via the re-definition of Settlement Boundaries ref. WW17). In the Foreword to Publication Plan: Greenfield sites are less favoured locations for development. Para 2.10 states Fareham Borough will retain its identity, valued landscapes and settlement definition and will protect its natural, built and historic assets. The proposed allocation of Policy HA1 contradicts these aspirations and those of Para 2.12 "Strategic Priorities" which strive to maximise development within the urban area and away from the wider countryside and to create places which encourage healthier lifestyles. The re-designation of the Policy HA1 to urban status and the movement of the Settlement Boundary to encompass it, is a blatant and possibly, unethical, manoeuvre by stealth of the council, to suit its own objectives.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

We really need to rethink the number of houses planned for development in Warsash, with no infrastructure supporting that development. Warsash is bounded on two sides by water - there is very limited access in or out, especially with another potential 1600 cars in the village.

Remove the proposal to redefine the settlement boundary

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Reconsider the transport, traffic and impact on local infrastructure.

It will also the area to retain its identity, valued landscape and settlement definition

Your suggested revised wording of any policy or text:

Revise the policy test in line with environmental, amenity and traffic issues

I have no revised wording to suggest. I am not a town planner or lawyer.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

No, I don't want to take part in a hearing session

2) Paragraph: 5.6

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Strategic Policy DS1 (Paras 5.6 and 3.36) deals with the need (in exceptional circumstances and where necessary and justified) for residential development in the countryside on previously developed land. Additionally, Policy HP1 calls for the efficient use of existing buildings to meet such need on a one-for one replacement dwelling basis. These conditions do not apply to HA1 and therefore it seems the "convenient" alternative was for FBC to redraw the urban boundary!

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the proposal to redefine the settlement boundary

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would protect the local identity, valued landscapes and settlement definition

Your suggested revised wording of any policy or text:

I have no proposed revised wording - I am not a lawyer or town planner

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Paragraph: 3.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The decision to “rewild” the Stubbington Strategic Gap was made without consultation with council officers or elected Members. Instead, this announcement came via a press release issued after the start of the Full Council meeting which was in the process of debating this Plan?

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reconsider the re-wilding or the Stubbington gap. Why couldn't Warsash have this designation instead, and the building commence at Stubbington?

How would the modification(s) you propose make the Local Plan legally compliant or sound?

I would allow a full consultation on the options available, instead of choosing the most convenient

Your suggested revised wording of any policy or text:

I have no revised wording - I am not a lawyer or town planner

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Paragraph: 1.28

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 1.28 In agreeing to take up a shortfall in homes of 847 from Portsmouth, Fareham Council are taking a risk as the new methodology for calculating Housing Need has not been signed off by the Government and the Housing Delivery test will not be available during this public consultation period.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The government appear to be changing their mind on allocation of housing - Fareham has taken too much of a hit and should revisit the building targets.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would re-look at the housing targets for the region

Your suggested revised wording of any policy or text:

I have no revised wording or text

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

5) Paragraph: 9.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Whereas the LPA is aspiring to Nitrate Neutrality, Strategic Policy NE1 requires designated sites be protected and ENHANCED Likewise Para 9.50 (Policy NE4) confirms permissions will be granted when the integrity of designated sites be maintained or IMPROVED. Finally, Page 199 Para 9.54 indicates that proposals for development should provide a net REDUCTION in eutrophication for designated sites in an unfavourable condition. The LPA's approach therefore contravenes both the Habitats Directive and the Publication Plan in respect of these policies. Furthermore, a leading QC's opinion is it is unclear how any development could be contemplated in the Western Wards without negatively impacting the SAC and RAMSAR sites and therefore based on proximity alone, this would invalidate the deliverability of these developments. As per advice from Natural England, it is the responsibility of the LPA to fulfil its legal obligations and satisfy themselves beyond scientific doubt, that adverse effects on the designated SAC, SPA and RAMSAR sites, from harmful nutrients generated by new residential development, has been mitigated (rather than compensated). There is doubt that the LPA is applying the Natural England advice correctly and lawfully in this respect.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The development site needs to be protected and improved , with a net reduction on nitrites and consider the legal opinion.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would meet legal requirements on the habitats directive

Your suggested revised wording of any policy or text:

No comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

6) Paragraph: 1.16

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

No mention is made of the 2017 unadopted draft Plan and Officers confirm it is the previous, 2015 plan which is extant. Para 4.8 Allows the LPA to consider Housing sites allocated in the previous adopted (extant) Local Plan. Yet, whilst HA1 did not feature in the extant 2015 Plan, page 38 ignores this, stating that housing will be provided through HA1 and other local sites. The total new homes proposed for specific sites across the Borough (not including Welborne) is 1342. It is an unfair distribution for HA1 (proposed at 830 dwellings) to contribute 62% of this quantum. Moreover, whilst FBC recently enjoyed an overall reduction in new houses of 22.5% they are now proposing Warsash should endure a 20% increase in their local number! There is no joined up "Masterplan" for HA1 (with developers working in complete isolation of one another). Therefore, another environmental impact assessment must be conducted showing the cumulative effect of HA1 in its entirety.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Reconsider the allocation of housing to Warsash and reconsider redistribution across Fareham. Complete a full environmental assessment for all development in Warsash

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Fairer distribution of housing allocation, with full impact assessment for all proposed development, rather than in isolation

Your suggested revised wording of any policy or text:

No comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

7) Paragraph: 1.5

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Introduction: Statement of Community Involvement Paragraph 2.1 says a "variety of methods" should be used to solicit comments from the public. Because paper-based documents failed to be employed across the borough, a large proportion of residents were deprived of sharing their opinion. This was exacerbated by Covid restrictions, limiting the access to libraries and the council office. The Publication Plan Introduction Page 1 specifies that representations should focus solely on "Tests of Soundness" but is contradictory to FBC's guidance in Fareham Today which includes the additional areas of "Legal Compliance" and "Duty to Cooperate" This is misleading and confusing to members of the public wishing to provide commentary. Since 2017 residents' concerns have not been considered regardless of protest marches, deputations and objections raised. For example, despite a petition exceeding the prerequisite number of signatures needed to trigger a Full Council meeting debate, such debate was refused, even after a challenge was raised to the Council's scrutiny Board. It is discriminatory that community-generated evidence carries less weight than that provided by Developers consultants. E.g. regarding previous use of land in Nitrate budget calculations similarly with traffic survey results captured by residents and Community Speedwatch teams. Para 4.7 The Warsash Neighbourhood Forum (although now defunct) were never consulted with respect to their intention to allocate housing, in line with Para 66 of the NPPF.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

It needs to have a much wider consultation process, involving great access for the community. The online method is restrictive for many people.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would allow all residents to view and comment on the proposals

Your suggested revised wording of any policy or text:

No comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

8) Paragraph: 10.26

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Infrastructure Delivery Plan calls for the expansion of health care provision through the addition of further GP locations in the Western Wards, However the table provided within the document only provides an historic timeline pre-dating the Local Plan. This is not a Sound approach taking into consideration that HA1 alone will bring an additional 830 dwellings.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Legally enforce the provision of further healthcare provision

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would provide sufficient healthcare resources to meet the demand of the additional housing

Your suggested revised wording of any policy or text:

No comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

9) Paragraph: 7.13

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Local retail/commercial facilities figures do not cater for the additional houses in Warsash. For example, no additional convenience goods floor space has been allocated to Warsash. Para 7.18 Out of town shopping is discussed, but not defined; Out of town shopping will take jobs and customers away from local shopping areas and will increase traffic on the routes in and out of Warsash and Locks Heath.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Legally enforce the provision of further retail space in Warsash

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would reduce traffic and provide local jobs in the community

Your suggested revised wording of any policy or text:

no comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

10) Paragraph: 10.26

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Infrastructure Delivery Plan Section 5.4 Education is planned with HCC but the period of any proposed extensions for child placements is only up to 2021 whereas the Plan covers up to 2037. This is not a sound approach for the education of our children.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

There is already a lot of pressure on the local schools - adding more housing will in most likelihood, force children to travel some distance for schooling. the plan needs to legally enforce the provision of further schooling through the lifetime of the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would provide for child placements up to the lifetime fo the plan

Your suggested revised wording of any policy or text:

no comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

11) Paragraph: 11.34

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

The council will support applications where development exceeds Building Regulations but no percentage target for improvement has been set. The Plan is therefore not a Sound and effective approach to carbon emissions reduction in the Borough.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Set targets for exceeding carbon emissions as part of the plan

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It will legally enforce the reduction of carbon in the borough

Your suggested revised wording of any policy or text:

No comment

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Jones, Daren [REDACTED]
Sent: 17 December 2020 20:32
To: Consultation
Subject: Local Plan comments

Serco Business

I am writing to make a comment on Fareham Councils Local Plan 2037 and in particular Strategic Policy DS3.

Figure 3.3 shows areas of 'Special Landscape Quality' and includes Wicor Recreation Ground. It is my opinion that this area should be enlarged to include the top quality agricultural land to the north of Wicor Rec and the Portchester football club. As well as being top grade agricultural land, it has been recently recognised as being of great importance to the Brent Geese and Solent Wader strategy and recognised as vital support area for the nearby SPA by Natural England.

Kind Regards

Daren

Daren Jones
Engineer
Serco Design, Integration and Test



serco

Keely, Lauren

From: [REDACTED]
Sent: 10 December 2020 17:35
To: Consultation
Subject: Representation
Attachments: Scan_20201210 (2).jpg; Scan_20201210 (3).jpg; Scan_20201210 (4).jpg

Dear sirs,

Please find attached my representation for review by the Inspector.

Kind Regards

Mike Jones

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:

MR

First Name:

MIKE

Last Name:

JONES

Job Title: (where relevant)

N/A

Organisation: (where relevant)

N/A

Address:

Postcode:

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Address:

Postcode:

Telephone Number:

Email Address:

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

H2 2 NEW SMALL SCALE DEVELOPMENT OLS URBAN AREAS

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

There is no justification for identifying such sections of land as acceptable or suitable for development. Inclusion will result in an infinite supply of back garden development

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the policy entirely

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Removal will ensure that the draft Plan is sound.

B4c Your suggested revised wording of any policy or text:

complete removal of this ill thought Policy

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

1. I was not aware of most of the CMT meetings
2. Very little weight is given to public opinion at such events
3. The inspector should hear directly from the public

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Respondent details:

Title:	Dr
First Name:	Toby
Last Name:	King
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 5.99

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Using 77 Burrridge Road for three further traveller sites is not sound. It is blatantly in breach of the Housing Policy HP11: There are no accessible shops, schools or health facilities accessible by sustainable transport (there's no bus or school bus service, the catchment schools are over 3 miles away, the A3051 is too dangerous to cycle on and there is noo bike path.) The site is acknowledged to be important for biodiversity and Barn owls and tawny owls hunt on it constantly (we see them) and newts and grass snakes are also there (I have seen both.) The access is terrible - it's a single-lane track that has already deteriorated with only one pitch occupied There is not enough parking - even with only one pitch, the occupants have to park one of their vehicles up Burrridge Road - with 4 sites it would be untenable. The proposed temporary homes and day rooms are out of keeping - what the site needs os one or two detached single-family houses in keeping with the rest of Burrridge. Many of these issues were highlighted three years + ago when the original single site was proposed, so the Council has had plenty of time to find better sites in the Borough. Whilst the current owners have done a great job keeping the site tidy and well looked after, it's clearly against policy and practicality to envisage 4 such dwellings, particularly given the proximity of the remaining pitches to existing houses. In summary, the proposal in not sound, is against the council's own housing policy, threatens a number of endangered wildlife species, will cause parking and traffic chaos and is completely out of keeping with the local area.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Traveller pitches need to be found that comply with the council's policies on housing and biodiversity. They only need three across the whole borough, it seems,

How would the modification(s) you propose make the Local Plan legally compliant or sound?

See above. The sites could be located in other residential areas that have better amenities

Your suggested revised wording of any policy or text:

See above,.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	mrs
First Name:	Helen
Last Name:	Laws
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

I am very concerned that the sewage system be adequate for the new housing proposed. It concerns me greatly to learn that Southern Water released raw sewage into rivers last year 19,977 hours in 3,219 incidents. In March, the company separately pleaded guilty to 51 pollution charges over five years involving breaches of Environment Agency permits at treatment plants, which included 8,400 incidents of sewage escaping. Water companies were told by the government to install monitoring on the majority of their combined sewer overflows by March 2020. More than 60 discharges a year from a storm overflow should trigger an investigation by the agency but the data reveals some storm overflows have released discharges hundreds of times. The Environment Agency relies on water companies to self-monitor their combined sewer overflows. The Environment Agency could not say whether any of the 1.5m hours of UK spills last year had led to an investigation. I am very concerned the self regulation in inadequate and enforcement and civil sanctions are not being applied where they should be to keep Fareham and its residents safe.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

That Fareham is compliant with water safety and sewage management. That the environment agency investigates as is its duty when too many combined sewage overflows happen. That Farehams rivers, creek and sea are safe for the watersports and activities that are a part of Farehams culture and identity.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Fareham would be compliant with water safety.

Your suggested revised wording of any policy or text:

That Fareham council monitors the activity of Southern Water and the Environment Agency within its borders.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Alison Collett <[REDACTED]>
Sent: 14 December 2020 12:07
To: Consultation
Subject: Fareham Local Plan 2037
Attachments: Fareham LP 2037 Comment.docx

Hi

Lee Residents Association Planning are unable to complete the on line consultation form in respect of the Fareham Local Plan 2037 and therefore attach our comments to this email. We would like this communication to be shared with the Planning Inspectorate.

Lee Residents Association
c/o Alison Roast



Regards
Lee Residents Planning

Sent from [Mail](#) for Windows 10

Comments to Fareham Borough Council's Publication Local Plan 2037

1. The Lee Residents Association (LRA) is broadly content with Fareham Borough Council's Publication Local Plan 2037, with a reservation outlined in paragraph 3. In particular we offer support for the changes that:
 - the land east of the relief road Newgate Lane East (formerly designated HA2) is no longer identified as a housing allocation
 - the removal of an identified Strategic Growth Area situated in the Fareham, Gosport, Lee on the Solent and Stubbington Strategic/Settlement Gap (Strategic Policy DS2)
2. The LRA also fully endorse the submission made by Gosport Borough Council drawn up in its capacity as an adjoining Local Planning Authority.
3. While broadly content as expressed in paragraph 1, the LRA has remaining concerns over the link in Policy DS1 to Housing Policy 4. We object to the wording in HP4c which is related to the 5-year housing supply requirement which has a contingency should the additional housing requirement extend beyond the capacity of brownfield and already identified development sites. The objection is that any further encroachment on the Fareham, Gosport, Lee on the Solent and Stubbington Strategic/Settlement Gap (Strategic Policy DS2) will be detrimental and significant. Despite the caveat that the development ***"is sensitively designed reflecting the landscape character with the proviso it does not significantly affect the integrity of a strategic gap"***.

If further housing is needed this should be provided within urban areas or the planned Welborne development.
4. Similarly, we would also object to any other development detailed in HP6 such as Affordable Housing being placed within the Strategic Gap. As identified previously any development, affordable or prestigious will still be counter to policy DS2 particularly if a series of large-scale affordable housing developments were authorised under this policy relaxation.
5. The LRA have consistently maintained objections to policies in other versions of the Local Plan and to recent speculative Planning Applications proposed by developers within the Strategic/Settlement Gap.
6. In summary, the objections are due to the detrimental impact it will have on Local Infrastructure, the economy of the Solent Enterprise Zone as well as Gosport Borough Council. It would negate any improvements to the local roads currently being provided to alleviate existing traffic congestion. In particular it would lower the quality of life for all residents that live south of the Strategic/Settlement Gap by exacerbating the existing transportation problem and adding further unavoidable pollution to the Air Quality Management areas.

We would like this communication to be presented to the Planning Inspectorate.

Lee Residents Association Planning

Respondent details:

Title:	Mr
First Name:	Robert
Last Name:	Leech
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA42 - Land South of Cams Alders

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

My objections are that Fort Fareham Road would not be able to cope with any additional traffic that this development may cause and there is already a significant lack of parking facilities to cope with existing residents, let alone adding more to the equation. The lack of parking is already a problem that does not need adding too. However, more important than that is the effects on the well established local wildlife that this will impact.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

No development

How would the modification(s) you propose make the Local Plan legally compliant or sound?

There would be no development

Your suggested revised wording of any policy or text:

N/A

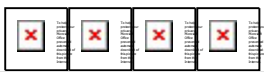
If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 18 December 2020 09:43
To: Planning Policy
Subject: Litchfields (on behalf of David Lloyd) consultation response
Attachments: 201217 Fareham David Lloyd Representation FINAL.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Ian Anderson [REDACTED]
Sent: 17 December 2020 18:50
To: Consultation <Consultation@fareham.gov.uk>
Subject: Representations to Publication version of the new Fareham Local Plan.

Dear Sir / Madam

We are instructed by our client, David Lloyd Leisure Ltd (David Lloyd), to submit general representations following Fareham Council's release of its Publication Version Local Plan.

We appreciate that the advanced stage of the publication document supports representations only in those areas where consideration is given to whether the Plan is sound, legally compliant or otherwise on the Council's approach to the duty to co-operate. However, following a business review, David Lloyd has a requirement within the Fareham area and would welcome the opportunity to meet with the Council, either as part of the local plan process, or separately, to examine the opportunity for provision of a heath and racquets club within the Fareham area.

We enclose a letter setting out these representations which we would welcome to opportunity to discuss.

Yours faithfully

Ian Anderson

Ian Anderson
Senior Director
Lichfields, The Minster Building, 21 Mincing Lane, London, EC3R 7AG
T 020 7837 4477 / M 07947362618 / E [REDACTED]

lichfields.uk  

Mangling the mutant: Change to the standard method for local housing need

[VIEW BLOG](#)



This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.

Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at The Minster Building, 21 Mincing Lane, London, EC3R 7AG.

Local Plan Consultation

Planning Department
Fareham Borough Council
Civic Offices
Civic Way
FAREHAM
PO16 7AZ

17th December 2020

Dear Sir/Madam,

**DAVID LLOYD LEISURE LTD REPRESENTATIONS.
FAREHAM LOCAL PLAN 2037: PUBLICATION VERSION (NOVEMBER 2020)**

We are instructed by our client, David Lloyd Leisure Ltd (David Lloyd), to submit general representations following Fareham Council's release of its Publication Version Local Plan.

We appreciate that the advanced stage of the publication document supports representations only in those areas where consideration is given to whether the Plan is sound, legally compliant or otherwise on the Council's approach to the duty to co-operate. However, following a business review, David Lloyd has a requirement within the Fareham area and would welcome the opportunity to meet with the Council, either as part of the local plan process, or separately, to examine the opportunity for provision of a heath and racquets club within the Fareham area.

The deadline for making representations is the 18th December: these representations are submitted within that timeframe.

Background

David Lloyd is Europe's premier health, racquets and fitness provider.

David Lloyd has operated for over 30 years and owns some 100 David Lloyd clubs in the UK and a further twenty-four across Europe¹. David Lloyd has ambitious growth plans both in the UK and Europe.

The business has some 660,000 members and is a significant employer in the health and fitness market, employing over 8,600 people. These include an expert health and fitness team of over 2,000 professionals and more than 680 tennis coaches. David Lloyd Clubs had been awarded a Sunday Times Top 25 Best Big Companies award for the past four years, most recently making it to the number 16 spot in 2020.

¹ Including 3 Harbour Clubs & 8 Meridian Spa Clubs

David Lloyd's racquets' facilities are unrivalled in the UK, with some 1000 tennis courts, 400 badminton courts and squash courts.

In addition to the racquets' facilities, across all clubs, David Lloyd has over 150 swimming pools and the company offers more than 10,000 exercise classes every week.

David Lloyd also provides significant coaching programs for children, both as part of the normal operation of its clubs and as 'outreach' to local schools, colleges and other amateur organisations. It is estimated that every week some 25,000 children swim and some 16,000 receive tennis coaching at David Lloyd clubs.

In addition to the core activities of racquets and health and fitness, a number of clubs also benefit from health and beauty spas, lounges, food and beverage, crèches, nurseries and specialist sports shops.

The COVID-19 pandemic has brought into sharp focus the need for both fitness and mental resilience and David Lloyd are at the forefront of development both in fitness innovation across its clubs, and mindful-wellness through group exercise classes and spas.

Property Aspirations and Requirements

David Lloyd are seeking a location in the Fareham area with the following characteristics:

- An area of Circa 2.1 Ha / 5 acres;
- A building footprint of circa 2,500 GFA with further provision for a permanent playing air-dome of circa 1,700sqm GFA;
- External areas for outdoor pool and spa garden;
- Approximately 250 parking spaces; and
- Preferably out of town location, with good access by both public transport and car.

In both the UK and Europe sophisticated analysis and consumer data assists David Lloyd in identifying where the demographic sweet spot is in any given location.

David Lloyd has identified 50 location across the UK, including the Fareham area, that have a demographic profile that compares to the existing membership base and where there is an under provision of premium Health & Racquets facilities. This exercise enables David Lloyd to search in very targeted locations for suitable development sites.

Employment

A David Lloyd club is estimated to generate around 75 Full Time Equivalents (FTE's).

These FTE's break down in the following way:

Full Time

- 49 Full time David Lloyd Members of Staff; and
- 25 Part time David Lloyd Members of Staff
- 4 Part time Tennis Pro's (who are self employed)
- 5 Part time 'Blaze' instructors (who are self employed); and
- An estimated 12 group exercise instructors (who are self employed)

The club targets local employment opportunities in the appointment of full time, part time and self-employed staff. In the majority of cases therefore, employment is sourced locally, targeting local job markets to fulfil the needs and function of the club. Additional services,

including cleaning contractors, deliveries for the restaurant and maintenance requirements are, again, sourced locally where possible.

Development Site Opportunities

Leisure development is an essential part of any mixed-use development and contributes to healthy and socially sustainable communities. The UK health and fitness market continues to grow, with trends continuing towards a more health conscious society, which has seen a boom in mental wellness and holistic classes including yoga, Pilates and mindfulness.

This social sustainable agenda is strongly supported within the published planning guidance by Sport England.

This 'Planning for Sport' Guidance focuses on 12 principles which seek to help the planning system provide opportunities for all to take part in sport and physical activity. The guidance builds on the importance the Government, and its National Planning Policy Framework, places on the need for the planning system to enable and support healthy lifestyles.

Principle 8 states planning policies and Councils should support the new provision, including allocating new sites, for sport and physical activity which meets identified needs. The guidance further adds the planning system should be proactive in delivering new sport and physical activity provision which implements the recommendations and actions of relevant assessments of need. Where relevant, this should include allocating deliverable sites for new provision for sport and physical activity planning policy documents (for example site allocations documents and neighbourhood plans).

At this stage David Lloyd have not secured a specific site in Fareham but have been reviewing various opportunities along the M27 corridor.

David Lloyd would welcome the opportunity to be considered by the Council as either part of or solely suitable development sites, which are being promoted through the Local Plan process. Noting the provisions of R4 we have considered and rejected the Market Quay site in Fareham as, even applying a flexible approach to our business model (notably the requirements for our racquets elements) and taking into account the wider mixes proposed on this site, it would not be suitable for our needs.

Similarly, David Lloyd would welcome the opportunity to be considered as an alternative allocation if there are any long-standing development sites that have not come forward through previous Local Plan, or the existing emerging Plan process so far. In such cases, David Lloyd would be happy to engage with the Council regarding the possibility of repurposing and reallocating such land for its leisure use.

We look forward to hearing from you with confirmation that this written representation has been received and its contents noted, although clearly this is set within the context of David Lloyd not having made representations to earlier versions of the Fareham Plan.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,



Ian Anderson: Senior Director, Planning



Respondent details:

Title:	Mr
First Name:	Trevor
Last Name:	Ling
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: TIN4 - Infrastructure Delivery

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

The Delme roundabout study assumes a change of traffic lights will resolve current problems assuming that the PM traffic congestion is not considered. With the major increase in planned infill at DOWNEND ROAD there is little hope that the increased traffic during this rush hour will be any better. The infrastructure plans are inadequate for future planned development off the A27.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Re-think Delme roundabout plans or stop future development until a viable solution is found and tested

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Prevent further degradation of air quality at Cams school and unacceptable traffic queues on A27

Your suggested revised wording of any policy or text:

Remove future development plans off A27 until satisfactory infrastructure is implemented and proven to work

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 16 December 2020 16:40
To: Planning Policy
Subject: LRM planning (on behalf of Hallam Land) reg 19 response
Attachments: 201216 Ltr FBC Reg 19.pdf; 201215 Fareham Local Plan Reg19 Response.pdf; Representation Forms.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Owen Jones <[REDACTED]>
Sent: 16 December 2020 16:32
To: Consultation <Consultation@fareham.gov.uk>
Cc: Ruth McKeown <RMCKEOWN@hallamland.co.uk>; will <will@m-c-c.biz>; Kate Coventry <katecoventry@lrmp planning.com>
Subject: Fareham Local Plan Regulation 19 consultation

Dear Sir/Madam, I am writing on behalf of Hallam Land Management Limited and herewith submit representations in response to the Local Plan Regulation 19 consultation. These concern the following matters:

- The Plan's Vision and Strategic Objectives (Section 2)
- The Development Strategy (Section 3)
- The Housing Requirement and its components in Policy H1 and the housing supply assumptions associated with this.
- The Sustainability Appraisal having not tested a higher level of development as a reasonable alternative
- The delineation of the Strategic Gap at South Fareham on the Policies Map
- The delineation of the Waders and Brent Geese Support Areas on the Policies Map and Policy NE5.
- The allocation of the South Fareham Strategic Growth Area

In respect of the housing requirement in Policy H1, we are aware that the Government has now published its revised Standard Method. Naturally, the Council will need to consider how it proceeds in light of this.

Should you have any queries, please do not hesitate to contact me on either [REDACTED] or via email [REDACTED]

Owen Jones
Director

<https://lrmp planning.com/charity-13-hour-run-for-the-nhs/>
[LRM Planning - Covid 19 Statement](#)

[REDACTED]
website: lrmp planning.com
twitter: @lrmp planning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).



16 December 2020

Our Ref: OJ/18.214

Fareham Borough Council
Planning Policy
Civic Centre
Fareham

Dear Sir/Madam

Fareham Local Plan Review Regulation 19 consultation

I am writing on behalf of Hallam Land Management Limited and herewith submit representations in response to the Local Plan Regulation 19 consultation. These concern the following matters:

- The Plan's Vision and Strategic Objectives (Section 2)
- The Development Strategy (Section 3)
- The Housing Requirement and its components in Policy H1 and the housing supply assumptions associated with this.
- The Sustainability Appraisal having not tested a higher level of development as a reasonable alternative
- The delineation of the Strategic Gap at South Fareham on the Policies Map
- The delineation of the Waders and Brent Geese Support Areas on the Policies Map and Policy NE5.
- The allocation of the South Fareham Strategic Growth Area

In respect of the housing requirement in Policy H1, we are aware that the Government has now published its revised Standard Method. Naturally, the Council will need to consider how it proceeds in light of this.

Should you have any queries, please do not hesitate to contact me on either [REDACTED] or via email [REDACTED]

Your faithfully,



Owen Jones
Director





LRM
PLANNING
LIMITED

FAREHAM LOCAL PLAN 2037

Regulation 19 Publication Draft

Response prepared on behalf of Hallam Land Management Limited

December 2020



Report Control

Project: Newlands, Fareham

Client: Hallam Land Management Limited

Job Number: 18.214

File Origin: [https://lmapplanninglimited.sharepoint.com/18/18.214 Fareham/8 Representations/201113 Fareham Local Plan Reg19 Response.docx](https://lmapplanninglimited.sharepoint.com/18/18.214%20Fareham/8%20Representations/201113%20Fareham%20Local%20Plan%20Reg19%20Response.docx)

Document checking

Primary author: Owen Jones

Initialled: OJ

Review by: xxxx

Initialled: xxxx

Issue	Date	Status	Checked for issue
A	14/12/2020	Final	OJ



Contents

	Executive Summary	3
1	Introduction.....	5
2	Vision and Strategic Priorities.....	7
	National Planning Policy Framework	7
	The Vision	8
	Strategic Priorities	9
3	Development Strategy.....	11
	Good Growth.....	11
	Development Strategy.....	12
	Spatial Interpretation	15
	Development Strategy Policies	16
	Strategic Policy DS1: Development in the Countryside	16
	Strategic Policy DS2: Development in Strategic Gaps	17
	Strategic Policy DS3: Landscape	17
4	Policy H1: Addressing housing needs by the end of the plan period in an appropriate and sustainable manner	18
	Context.....	18
	Local Housing Need	20
	Unmet Need	21
	Plan Period	23
	Delivery at Welborne.....	24
	Proposed Allocations	25
	Windfall.....	25
	Revised Housing Strategy	26
5	South Fareham Strategic Growth Area.....	28
	South of Fareham	28
	Development Potential.....	28
	Accessibility and Movement	29
	Nitrates	30
	Biodiversity	30
	Strategic Gap	31
	Summary	32
6	Policy NE5 and Policies Map	33
7	Summary	34
	Proposed Modifications	35



Executive Summary

Local Plans should be prepared to contribute to the achievement of sustainable development. They should be positively prepared and seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. As the starting point, strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. These requirements exist within the context of the Government's now longstanding objective to significantly boost the supply of homes.

The Regulation 19 Plan, which is meant to be the Plan the Council intends to submit for Examination, is not founded on the Government's published Standard Method as required by the NPPF and NPPG.

Rather, the Council has alighted upon the possible outcome of a Government consultation document and has based the Development Strategy, Policy H1 and the strategy to meet housing needs on this lower level of housing. This is manifestly unsound.

The fact that the Council do not intend to submit its plan until there is certainty as to a change to the Standard Method does not mitigate the cost of conducting this consultation to the public purse or unnecessary expenditure by other public and private bodies. Moreover, this approach plainly risks undermining public confidence in the plan-led system, if, as is possible, the housing requirement has to be increased. The Council has simply acted prematurely in seizing upon a consultation document that suggests a lower housing requirement; this may be expedient but is the antithesis of positive planning. Put simply, there is no basis for the Council to have formed this consultation document at the present time.

In the event that the Government decides not to proceed with its amendment to the Standard Method, or that such an amendment results in a different outcome for Fareham, the Council will need to further amend the plan. In that instance, a wholly new consultation exercise would be required given the likely magnitude of amendments that would be necessary, adding further delay to the plan-making process, and cost to the public purse and to interested parties, whilst, regrettably, undermining confidence in the Local Plan process.

Moreover, the Council has not recognised the context within which this Plan is being prepared. Housing delivery relative to the Core Strategy has resulted in a substantial shortfall in new housing over past years and this Plan provides an opportunity for positive and ambitious planning to ensure development needs are met and the principles of good growth are achieved. The Plan fails in this regard.

The Council purports to make a contribution towards meeting the unmet need of its neighboring authorities; however, this does not reflect the scale of the unmet needs identified by the Partnership for South Hampshire (PfSH) of over 10,000 homes. It is not at all apparent that this Plan is founded on constructive, active and on an ongoing engagement as required by Section 33A.

It is instructive that whilst Welborne was identified to provide housing to meet sub-regional requirements, its role has now changed to meeting the Borough's housing needs first and foremost;



consequently this Plan makes a significantly lower contribution to the wider sub-regional needs which plainly have not diminished.

Furthermore, the Plan has exaggerated the likely housing supply from Welborne and other sources to such an extent that a shortfall in housing supply is inevitable.

The Plan overlooks the opportunity provided by the previously identified Strategic Growth Area at South Fareham which would make an important contribution to housing supply in the short term and providing surety of supply over the longer term. The suitability of this location is apparent from the Council's evidence base; it is accessible to the Borough's main urban area, it is not an area that is sensitive in landscape terms, development can be accommodated without undermining the principle of separation between Fareham and Stubbington, there are no environmental designations that preclude development and the transport modelling and its' conclusions has assumed development in this location. A development scheme in this location can also deliver nitrate neutrality and biodiversity net gain. Development to the South of Fareham can achieve *Good Growth*.

Unfortunately, the Sustainability Appraisal does not consider higher levels of growth consistent with the January 2020 Local Plan Supplement, and, as such, fails to consider a reasonable alternative.

The following Modifications are considered necessary for the Local Plan to be sound:

- The minimum housing requirement should be defined by reference to the existing Standard Method;
- The housing requirement should be increased further to take account of the low level of completions from 2018 onwards compared to the level of local housing need;
- The level of unmet need that is accommodated should be based on constructive, active and on ongoing engagement with neighbouring authorities;
- Assumptions about the delivery of new housing at Welborne should be revisited and revised down;
- The windfall allowance should be revised down;
- Alternatively, the level of contingency should be increased;
- Additional housing allocations should be provided for;
- Land South of Fareham should be allocated for housing development; and
- Separate from the allocation of land South of Fareham, the boundary of the Strategic Gap south of Longfield Avenue and west of HMS Collingwood should be amended so as not to include the land identified by the Borough Council's *Technical Assessment* that is not considered integral to the Gap function.
- The designation associated with Waders and Brent Geese on the Policies Map should be altered with consequential changes to Policy NE5.



1 Introduction

- 1.1 Hallam Land Management Limited ('Hallam') control a substantial tract of land to the South of Fareham, south of Longfield Avenue, west of HMS Collingwood and adjoining the Stubbington Bypass, the construction of which has recently commenced.
- 1.2 In successive representations to the Local Plan Review we have draw attention to the merits and advantages of locating development to the South of Fareham and how this would achieve the Borough Council's objective of *Good Growth*.
- 1.3 In the January 2020 Local Plan Supplement, this land, along with other parcels in this location, was identified by the Borough Council as a potential Strategic Growth Area.
- 1.4 In the current consultation document, such an allocation has not been carried forward.
- 1.5 On this occasion, the Borough Council's has alighted upon the possible revision to the Government's Standard Method for assessing local housing need, which suggests a lower level of housing for Fareham.
- 1.6 In our opinion, the Borough Council are wrong to have published this consultation document in this form given the status of this version of the Plan is afforded by the Local Plan Regulations; *the Plan a Local Planning Authority intends to submit for Examination*. To have based a Plan on the possible outcome of a Government consultation is plainly premature and, regrettably, the Plan's housing strategy is not positively prepared and is unsound.
- 1.7 The Plan's housing strategy is not an effective one. It has no regard to past performance relative to the objective assessment of housing need and the level of contingency is not sufficient when the likely delivery of Welbourne is viewed objectively. Over the plan period a significant shortfall in new housing is inevitable.
- 1.8 For the reasons given in this representation, additional housing land should be allocated in Policy H1.
- 1.9 Land South of Fareham is an eminently suitable and sustainable location for future development and should be identified accordingly. In the context of the Borough Council's *Good Growth* principles that underpin the Plan's Development Strategy, Hallam's development proposals achieve the high-level development principles and requirements set out in the Local Plan Supplement which remain entirely appropriate.
- 1.10 It is especially significant that the Borough Council's assessment of Strategic Gaps has drawn the conclusion that new development can be located south of Longfield Avenue without harming the integral purpose of this earlier designation. We agree with this conclusion, which accords with our previous submissions that carefully planned development will not result in the coalescence of Fareham and Stubbington and that the separate identities of these settlements can be retained.
- 1.11 Development at South Fareham can be brought forward to provide new homes, associated community and commercial facilities within an overall scheme that provides accessible green infrastructure and open space that will enable residents and visitors to experience a high quality



of life and well-being. The accessibility of this location can be capitalised upon with investment in new sustainable and active modes of travel. By locating new development here, valued landscapes and natural environments will be preserved.

- 1.12 As such, and for the reasons given herein, the previous potential Strategic Growth Area at South Fareham should have been retained in the Local Plan for future development.
- 1.13 In our representations in the following Sections we set out that, whilst the Plan's Vision and Strategic Priorities are correct, absent amendments to Policy H1, this version of the Local Plan will not provide sufficient housing and this will run counter to its stated intention to address housing needs by the end of the plan period.



2 Vision and Strategic Priorities

- 2.1 In this Section of our representations we consider the consultation document's Vision and the Strategic Priorities that the Borough Council has identified. It is instructive to consider the extent to which the Plan's policies and proposals will, in practice, contribute towards this Vision being realised and the Strategic Priorities being met, in the context of what the NPPF's anticipates of a Local Plan.

National Planning Policy Framework

- 2.2 Para 15 of the NPPF requires that each Local Plan should provide a positive vision for the future of its area; a framework for addressing housing needs and other economic, social and environmental priorities. (emphasis added)
- 2.3 Para 17 requires that a Local Plan includes strategic policies to address the local authority's priorities for the development and the use of land in its area.
- 2.4 Para 20 states that strategic policies should set out the overall strategy for the pattern, scale and quality of development, and make provision for, *inter alia*, housing, employment, retail, leisure and other commercial development, infrastructure, community facilities and conservation and enhancement of the environment.
- 2.5 Para 22 states that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 2.6 Para 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.7 In the context of plan making making, the NPPF's presumption in favour of sustainable development is framed in the following terms:
- a. *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
 - b. *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 2.8 In this context, it is important to recognise the significance of the Regulation 19 stage in the plan-making process. This is the Plan the Borough Council intends to submit to the Secretary of



State for the purpose of Examination pursuant to Section 20 of the Act. This is explained in the NPPG *"The publication stage plan should be the document that the local authority considers ready for examination"*. Therefore, this is the Plan and the approach to meeting objectively assessed need that the Borough Council now consider appropriate.

- 2.9 But, as the Borough Council has suggested it won't decide whether or not to submit the Plan until it knows the outcome of the Government's review of the Standard Method, this is little more than a "wait and see" approach. This is plainly wrong given the importance of the plan-led system in overall terms, the alacrity with which an up-to-date Local Plan is needed in Fareham, and the need to maintain public confidence in the plan-making system generally.
- 2.10 As will be shown later, the practical difference between a housing strategy based of 520 dwellings per annum and 403 dwellings per annum is an 'end date' five years hence. When viewed in the context of providing surety over the longer term and the emphasis in the NPPF on exceeding the minimum requirement, adopting a higher growth level at this stage would have been the positive and responsible response to this circumstance.

The Vision

- 2.11 The Borough Council's Vision as set out in the consultation document intends that it:
- *"will accommodate development to address the need for new homes and employment space in Fareham Borough; and*
 - *new housing will address the particular needs in the Borough, such as our growing housing need and an ageing population and creating attractive places to live".*
- 2.12 The Vision is framed by reference to the Borough's needs, whereas Fareham is part of the established Partnership for Urban Southampton and has a role in contributing to meeting the housing needs of the sub-region. Indeed, there is no reference to Fareham's sub-regional role on any of the text associated with the Vision and Strategic Priorities in Section 2 of the Plan. In this context, the Vision should be drawn more widely.
- 2.13 Significantly, the allocation at Welborne in the Core Strategy was specifically for a sub-regional purpose, but its role by the present time appears to have been recast entirely; a matter we return to later.
- 2.14 Without prejudice to the above, achieving any Vision requires policies and proposals that are genuinely aligned with it. In respect of housing, the outcome of the Local Plan's policies and proposals should be that the Borough's housing needs are met.
- 2.15 As such, the Local Plan must, first, establish the correct strategic housing requirement in Policy H1 i.e. the overall number of new homes that need to be built by 2037 and, second, ensure a housing supply strategy that has the necessary surety that this can be achieved.
- 2.16 What experience both in Fareham and elsewhere has shown is that there must be an element of theoretical overprovision as part of the housing strategy to ensure that sufficient new housing is built.
- 2.17 To an extent the consultation document recognises this, but, as will be shown, it significantly



misjudges housing supply to such an extent that it undermines achievement of the Vision.

- 2.18 Conversely had a positive approach to plan-making been adopted, the Local Plan would have provided a robust planning strategy for the Borough.

Strategic Priorities

- 2.19 In the context of the Vision, the first Strategic Priority is to:

- *address the housing and employment needs by the end of the plan period in an appropriate and sustainable manner, creating places people want to live or where businesses want to locate.*

- 2.20 Again, there is no reference to Fareham's wider sub-regional role. In the context of Section 33A of the Planning and Compulsory Purchase Act, which requires constructive and active engagement on strategic matters, this is a surprising omission.

- 2.21 Without prejudice to this point, as a matter of principle, such a strategic objective is soundly based and is aligned with the significant importance the Government attaches to housing provision. Such a Strategic Priority is universally found in Local Plans national-wide.

- 2.22 However, in this instance, the apparent driver to the Publication Draft has been an attempt to reduce the scale of housing provision despite the Vision and Strategic Priority. This is the only conclusion that can be drawn from the Council having based its Regulation 19 Plan on a consultation document concerning a potential revision to the Standard Method.

- 2.23 This approach is plainly not sound for the following reasons:

- 2.24 Firstly, it departs from the method of calculating local housing need set out in para 60 of the NPPF. No exceptional circumstance has been suggested other than a lower figure is derived from the potential revision to the Standard Method. In a recent comment the Planning Minister referred to outputs based on the consultation exercise as "*entirely speculative*".

- 2.25 Secondly, even if that figure is correct, it is in no way obvious how the wider needs of the sub-region are to be met; across the wider geographic area as a whole the level of local housing need is suggested to be greater than has hitherto been the case.

- 2.26 Thirdly, the approach to housing supply significantly overstates likely housing delivery and the scale of contingency is simply not sufficient to ensure future housing supply would meet identified need.

- 2.27 The inevitable conclusion is that this version of the Local Plan is not positively prepared, justified, effective or consistent with national policy. Therefore, whilst the Plan may have a clear strategic priority to address the need for new homes in the Borough, its subsequent policy to base the strategic housing requirement of 403 dwellings per annum means, when considered objectively, that it fails to do so. To consciously plan for 20% less housing than has been identified firstly as necessary, and secondly as capable of being accommodated, is not properly addressing the need for new homes in the Borough.

- 2.28 In short, the Plan provides for too few houses over the plan period. This in turn will give rise to



adverse effects. It will restrict the number of people who are able to purchase new housing from doing so and constrain the operation of the housing market. It will also reduce the amount of affordable housing that is built because that is a proportion of the overall amount of housing. Moreover, by restricting market housing it creates an additional and greater incidence of housing need as people who would otherwise have been able to buy a market home are prevented from and they fall into housing need. This will have harmful socio-economic effects and runs counter to the Vision to meet the Borough's housing need.

2.29 For these reasons, the consultation document is not soundly based.



3 Development Strategy

- 3.1 The preceding Section has considered the Regulation 19 Plan's Vision and Strategic Priorities as they relate to housing provision and has identified that, as a practical effect, its policies and proposal will not deliver the intended outcome in terms of meeting housing need by the end of the plan period. In this Section, we consider the proposed Development Strategy and the extent to which it could accommodate a greater level of development if necessary.
- 3.2 The Plan's Development Strategy, set out on pages 17 – 32, and its associated Key Diagram and more detailed Policies Map, are framed by the Borough Council's approach to housing provision. This is evident from comparing the direction of travel outlined in the January 2020 Local Plan Supplement based on the published Standard Method and which identified the need for Strategic Areas of Growth to be allocated for future development, and the present approach which includes very few new housing allocations.
- 3.3 In the event the Borough Council has to re-cast its approach to housing provision, it will also need to adjust its Development Strategy in order to be able to deliver the strategic objective to address housing need. In this regard, it is of note that para 3.5 of the consultation document acknowledges that *"the [Local Plan] Supplement consultation in early 2020 identified the Council's preferred approach to its Development Strategy which it proposes to use to guide the focus of development until at least 2037"*. This clearly illustrates the suitability of the Strategy at that time as the basis of plan-making presently.
- 3.4 In the following paragraphs we comment on the various elements of the Council's Development Strategy both as articulated presently but also in the context of a revised housing strategy which would require additional land to be identified for development in the plan period.

Good Growth

- 3.5 The 2019 Issues and Options consultation established the principle of **Good Growth** as the keystone for the Local Plan's Development Strategy.
- 3.6 *Good Growth* was defined in the 2020 Local Plan Supplement in the following terms:
- building homes and creating employment spaces in such a way as to improve the quality of life whilst protecting the most valued and natural historic environments.
 - respecting environmental protections and delivering opportunities for environmental gain, providing opportunities for reduced energy demand and waste production, whilst sensitively managing the countryside and valued landscapes.
 - providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel rather than the car.
- 3.7 This definition has been retained in the Regulation 19 Plan.
- 3.8 These principles exist within an overarching scale of development that the Borough will need to provide for over the plan period. It is of paramount importance that, in the context of the Plan's Vision and Strategic Priorities, this scale of development is correctly defined at the outset; only then can it be said the Plan will address housing and employment needs adequately,



appropriately and sustainably. If the housing requirement is drawn too low, it will have negative social and economic effects.

- 3.9 It follows that, at the plan-making stage, the Local Plan is able to set out strategic and development management policies that have *Good Growth* principles at their core; both in terms of determining which locations in the Borough are to be allocated for new development and then the form and nature of such development.
- 3.10 The ensuing Land Use Strategy should prioritise locations that are able to achieve the principles of *Good Growth*, albeit there are instances where there are competing interest and, as with all planning decisions, balanced judgements will be necessary.

Development Strategy

- 3.11 This Section of the Regulation 19 Plan describes the factors that the Council has used to determine its Development Strategy. Because of the range of considerations that are inputted to, and then flow from this, what the Plan is actually describing is its land use strategy, namely where development is acceptable and conversely where factors determine new development would not be appropriate and other considerations are more important.

Landscape and countryside

- 3.12 We agree that there are parts of the Borough which have a fundamental importance in landscape terms and it is right that preservation of the landscape in those locations is the principal consideration. Figure 3.1 which illustrates the Key Diagram identifies "Areas of Special Landscape Quality" and we agree with the designation of the areas shown in this regard. Policy DS3, which we comment on later, should be worded to ensure that preserving the special landscape quality of these areas is given primacy.

Settlement boundaries

- 3.13 Settlement boundaries delineated in earlier development plans were drawn in the context of development needs as determined at that time.
- 3.14 Where the scale of development cannot be met on land within the Borough's urban area, development in the countryside adjoining main settlements is a wholly necessary and legitimate proposition.
- 3.15 As a consequence of allocating land for development to meet identified needs, settlement boundaries can and should be amended accordingly. In short, the existing settlement boundaries are not immutable.

The desire to respect settlement identity

- 3.16 Given that Areas of Special Landscape Quality have been assessed and delineated on the Key Diagram it is also necessary to consider whether land identified in the current Development Plan as Strategic Gap still requires such protection, whether its boundaries can justifiably be amended in light of up-to-date circumstances or whether any areas of land subject to that designation can be developed in order to contribute to a sustainable pattern of development.



- 3.17 The *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* considers existing Strategic Gaps in the adopted Local Plan and concludes that land south of Fareham, east of Peak Lane and west of HMS Collingwood does not perform the same function in terms of maintaining separation between Fareham and Stubbington as other land that is subject to this designation and is more integral to the purpose of preserving identity.
- 3.18 Chapter 4 of that Study, Paragraph 10 states that *"there exists some opportunities for development to be absorbed within the strategic gap subject to scale and future detailed design, without compromising its gap function combined with mitigation measures that can support green infrastructure enhancement"*.
- 3.19 It follows as a matter of principle that this land should not be designated as Strategic Gap in this Local Plan as this designation plainly cannot be justified in that location. Conversely, to continue to propose this land as Strategic Gap is not justified on the basis of the Council's own evidence.
- 3.20 It is highly material that the Local Plan Supplement had anticipated a Strategic Growth Area in this location, reflecting the broad conclusions of the earlier Options testing that this represents a sustainable and accessible location for new development and that such development can be accommodated without harm to the separation between Fareham and Stubbington. The significance of this is especially important in the context of the greater scale of development the Local Plan should accommodate and as such this represents an eminently suitable location for development. The fact this land is outside of the settlement boundary is in no way an overriding determinant that would preclude its allocation.

Climate change, flood zones and coastal management areas

- 3.21 We agree that the Local Plan should not direct major new development to areas identified as having a role in mitigating the impacts of flooding or coastal erosion. It is noteworthy that the areas of potential flood risk are associated with the River Hamble, River Meon, River Wallington and Lee-Solent estuary and are largely subject to nature conservation designations and landscape designations which limit the extent these locations would be suitable for development in any event.
- 3.22 In this context, the land identified as suitable for future development to the south of Fareham is not subject to flood risk and can be developed with Sustainable Urban Drainage measures that would not increase the risk of flooding elsewhere.

Protected areas for nature conservation

- 3.23 There are strategic nature conservation constraints that exist in the Borough in the form of International and Nationally designated sites. These overlap with other environmental designations and exert a significant constraint on where development can be located, limiting the extent of land absent a constraint. None of these constraints directly affect the land south of Fareham referred to in preceding paragraphs.

Transport corridors and opportunities to encourage more active travel modes

- 3.24 The NPPF advises that the planning system should actively manage patterns of growth to support sustainable travel. Significant development should be focused on locations which are



or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

- 3.25 In this regard, the Local Plan Strategic Transport Assessment states the following: *The proposed growth locations in the Local Plan to accommodate forecast population and economic growth, took a wide range of factors into consideration, including transport and access implications. Most of the Local Plan growth is located either within or on the edge of existing conurbations, providing good opportunities for trips to be made by modes of transport other than the private car. Consequently, the proposed growth in the Local Plan is generally in sustainable locations in terms of transport and access*”.
- 3.26 It is important to stress that this Transport Assessment in fact includes development at the Strategic Growth Areas, therefore, this conclusion reflects the suitability of new development in this location in these terms.
- 3.27 Whilst certain representations have previously raised concern about traffic impacts, the Transport Assessment concludes that the scale of development proposed (including the Strategic Growth Areas) and the resulting transport impacts are capable of mitigation at the strategic level, and that the Plan is therefore deliverable and sound from a transport perspective.

Need to encourage diversity in the housing market

- 3.28 We agree that there needs to be a balance in the portfolio of housing sites. We comment later on the likely delivery of housing from Welborne, which can only represent a modest supply of housing in anything other than the longer term.
- 3.29 To meet the objective of providing sufficient housing, additional housing allocations are required for all of the reasons in this representation and in particular those in response to Policy H1. Whilst development to the south of Fareham will change the character of part of the undeveloped land between Fareham and Stubbington, this must be balanced with the material benefits of the scheme in terms of the new housing to increase housing supply in the short term and to provide a surety of supply over the longer term.
- 3.30 The opportunity to the south of Fareham is of a sufficient scale to meet the identified need for market housing, affordable housing, specialist accommodation and self-build and custom build housing, along with the co-location of local services and facilities to support a new neighbourhood.

Sustainability and accessibility to services

- 3.31 Fareham is identified in the Core Strategy as a ‘key growth point’ in the South Hampshire sub region and a ‘secondary regional centre’. The town is the largest in the Borough with a population of approximately 37,000 people. Fareham is also an important economic centre, which has developed further over recent years, with the success of The Solent Enterprise Zone at Daedalus to the south of the town supported by significant investment in infrastructure improvements including improvements to Newgate Lane, Peel Common Roundabout and the construction of the Stubbington Bypass.
- 3.32 Amongst the advantages previously identified for the South Fareham Strategic Growth Area is



its proximity to the town centre, the Solent Enterprise Zone at Daedalus, the railway station and existing local services and amenities with good access to walking, cycling, and public transport links. Local facilities are situated along Bishopsfield Avenue and at Broadlaw Walk. Large-scale out-of-town retail facilities are located at Newgate Lane and Fareham Road to the east of Longfield Avenue.

- 3.33 Large-scale development to the south of Fareham, rather than a more dispersed pattern, would maximise opportunities to prioritise pedestrian and cycle links and extend public transport to maximise sustainable modes of travel.

The requirement to meet housing and employment needs

- 3.34 *Good Growth* can only be achieved if the Local Plan intends to meet objectively assessed need for housing, which for the reasons set out in response to Policy H1, it does not achieve this at the present time.

Spatial Interpretation

- 3.35 As a matter of principle, the identification of deliverable or developable previously developed land should be a priority, however, it is widely understood that such opportunities do not exist to accommodate the scale of new housing and employment required in the Borough.
- 3.36 Accordingly, the allocation of greenfield sites for future development is both a legitimate and necessary measure.
- 3.37 The morphology of the Borough is comprised of three urbanised areas: Fareham, Portchester and the 'Western Wards', which are part of a coastal conurbation that extends from Portsmouth in the east to Southampton in the west. Fareham is the pre-eminent urban area within the Borough in terms of services and facilities and public transport. Portchester and the 'Western Wards' are characterised more as residential suburbs.
- 3.38 Interspersed to a greater and lesser degree between these settlements are areas of separation comprising Portsmouth Harbour, Alver Valley, Meon Valley and the River Hamble. These are strategically important corridors that separate the main urban areas, protect their identity and prevent settlements within the coastal conurbation from merging together.
- 3.39 To the north of the M27, the Borough is of a more rural character, noting of course the proposed new community at Welborne which will undoubtedly change the character of this area over a long period of time.
- 3.40 Stubbington, a residential suburb, lies south of and separate from Fareham's urban area along with the sub-regionally important employment and logistics node at Daedalus. The Borough Council have stated aspirations to maximise the potential of the airfield's land and infrastructure assets through new commercial development, providing clusters for aviation, non-aviation and skills/innovation activity. This will contribute positively to the creation of skilled jobs in the Solent Enterprise Zone.
- 3.41 These characteristics have led the Council, rightly in our opinion, to consider the designation of Valued Landscapes as part of the Local Plan and in this context we are aware that the 2017 Landscape Assessment acknowledges the intrinsic landscape character of the Meon, Hamble



and Hook valleys.

- 3.42 We agree that the Meon Valley is a distinctly valued landscape. In our 2019 response to the Issues and Options consultation we referred to various Appeal decisions that alight upon the value of the landscape in this location. Continuing to protect this area from development and formalising a landscape designation in the Meon Valley would be appropriate.
- 3.43 The extent to which land around the 'Western Wards' is capable of accommodating new development is constrained by the extent of nature conservation designations close to the existing urban area which limits development opportunities to small scale schemes at most.
- 3.44 On the basis of the above, it follows that **locations that adjoin Fareham town, as distinct from villages away from it located in the rural hinterland to the north and west of the Borough, are inherently more suitable in terms of reflecting the morphology of the Borough, preserving its natural environment and maximizing accessibility to services and facilities to achieve the most sustainable pattern of development.**
- 3.45 The extent to which new development opportunities in those locations can consolidate and enhance the accessibility advantages of Fareham Town Centre and Daedalus are consistent with the *Good Growth* principles set out in paras 3.5 and 3.6 above.

Development Strategy Policies

- 3.46 Para 3.2 of the consultation document defines the Development Strategy as providing the *"distribution, scale and form of development and supporting infrastructure, a set of proposals to deliver the strategy, policies against which to assess planning applications, and proposals for monitoring the success of the plan"*.
- 3.47 In addition to the narration of the Strategy, this Section of the Plan includes three policies; the first controlling new development in the countryside, the second in respect of the Strategic Gap and a third concerning Landscape. These policies do not set out a Settlement Hierarchy or Spatial Strategy for the Plan area and such policies do not appear elsewhere in the Plan either. The practical effect of this is that there is no policy that delivers the spatial objectives in so far as where new development should be located i.e. affording a priority to locations within and adjoining Fareham town as the most sustainable location in the Borough.
- 3.48 Given that para 3.2 suggests the role of the Development Strategy provides a set of policies that direct where and how new development should be located, the omission of what are usually commonplace policies is significant.

Strategic Policy DS1: Development in the Countryside

- 3.49 Policy DS1 seeks to control the use of land outside defined settlement boundaries i.e. in countryside locations.
- 3.50 In some circumstances it would be appropriate to grant planning permission for new development in such locations. In those instances, the benefits of a development proposal would need to be considered against the criteria in part two of the policy. In this context, we do not agree that Criterion 'v' is drafted correctly.



- 3.51 On certain occasions other considerations associated with a development proposal would merit planning permission being granted notwithstanding the agricultural classification of the land concerned. In this regard, whilst the NPPF affords a preference to development of lower quality agricultural land, it does not preclude the development of best and most versatile land (see footnote 53 of the NPPF).
- 3.52 As presently drafted Policy DS1 conflicts with the expression of this policy approach in the NPPF; as such criterion 'v' should be reworded as follows: "*avoid or minimise the loss of best and most versatile agricultural land*".

Strategic Policy DS2: Development in Strategic Gaps

- 3.53 In earlier representations we have identified that the evidence base provided by the *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* does not justify the delineation of the Strategic Gap south of Fareham in the manner shown on the Key Diagram.
- 3.54 In particular, that Report identifies that the land south of Longfield Avenue and west of HMS Collingwood could accommodate new development without a significant adverse effect on the objectives of the Strategic Gap designation.
- 3.55 It follows that this land is not an integral part of the Fareham and Stubbington Gap.
- 3.56 As such the Strategic Gap should not extend across this land, as this would add a policy restriction that ought not apply on the basis of the published evidence. Put simply, such a designation should not include more land than is necessary to achieve its purpose.
- 3.57 For the Local Plan Key Diagram to be justified, and for the Local Plan to be sound, the delineation of the Strategic Gap south of Fareham should be amended accordingly.

Strategic Policy DS3: Landscape

- 3.58 The Local Plan intends to formalise Areas of Special Landscape Quality to reflect their valued status as determined through the *Technical Review of Areas of Special Landscape Quality and Strategic Gaps*. As written, Policy DS3 does not however afford any particular level of protection to these areas beyond Policy DS1, which in any event requires development proposals in the Countryside to "*conserve and enhance landscapes*".
- 3.59 Policy DS3 also appears to permit major development proposals in these locations whereas the Development Strategy has sought to avoid new allocations in these locations because of their landscape sensitivity. The definition of major development is provided in the Glossary¹ and when applied to this Policy, could see large scale development proposals being advanced when this is what the Local Plan is seeking to avoid. As drafted, this Policy does little to enforce the Plan's Development Strategy.

¹ For residential schemes, major development includes those of 10 dwellings or more or on a site of 0.5 hectares or more. For other development, it includes building(s) with a floor area of 1000sq.m or more or on a site of 1 hectare or more.



4 Policy H1: Addressing housing needs by the end of the plan period in an appropriate and sustainable manner

- 4.1 In this Section we consider specifically Policy H1 and whether, as presently formed, the Borough Council's strategic housing requirement and housing supply strategy are sound.
- 4.2 The NPPF expects the planning system to significantly boost the supply of new housing by providing, in the first instance, a sufficient amount of development land where it is needed (para 59 refers).
- 4.3 It is clear that a Local Plan's housing requirement is to be calculated by reference to the Government's Standard Method, unless exceptional circumstances can be proven (para 60 refers).
- 4.4 In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 4.5 As discussed in Section 2, the Plan's Vision and Strategic Priorities establish the intention to address the Borough housing and employment needs by the end of the plan period in an appropriate and sustainable manner, creating places people want to live or where businesses want to locate.
- 4.6 For the Plan to address, and indeed meet, housing needs by the end of the plan period, it is important to have regard to the following considerations which are material to determining a sound strategy in the context of the Government's presumption in favour of sustainable development:
- context and the backdrop to this Local Plan;
 - an objective assessment of local housing need;
 - unmet need from neighbouring authorities;
 - the Plan's housing deliver strategy and whether this is sufficiently robust.
- 4.7 As will be shown, the consultation document will not achieve this, and when measured objectively, a shortfall in housing supply over the plan period will be inevitable, contrary to the stated Vision and Strategic Priority.

Context

- 4.8 The earlier Core Strategy set out a Development Strategy for the period to 2026 that has hitherto been achieved in part only. This partial achievement has had significant implications for housing delivery in the plan area.
- 4.9 In aggregate, the Core Strategy intended that some 9,000 new homes would be built in Fareham



in the 20 years between 2006 and 2026. This comprised:

- 5,350 at the North Fareham Strategic Development Area (Welborne) to meet sub-regional needs as identified in both the South East Plan and the South Hampshire Sub-Regional Strategy; and
- 3,729 elsewhere in the Borough²;

- 4.10 Over the 13 years since the start of the Core Strategy's plan period (2006/7 and 2018/19) only 4,200 new homes have been built. This is equivalent to 46% of the housing requirement in 68% of the plan period.
- 4.11 In comparison with the trajectory on page 21 of the Core Strategy, new housing has had to be accommodated in locations outside of allocated Strategic Development Area; in the four years from 2016, almost twice as many new homes have been provided elsewhere in the Borough than the 469 intended for the whole of that 5 year period 2016/21.
- 4.12 Following the Core Strategy, when the Welborne Plan was prepared in 2015, and to reflect the changed circumstances by then the Council re-calculated likely delivery at the Garden Village. Policy WEL3 identified approximately 6,000 new homes to be completed by 2036. First completions were to be achieved in 2015/16, 1,500 completions were to have been achieved by 2021 and 2,860 completions by 2026.
- 4.13 Plainly this hasn't been achieved and without question there has been a substantial shortfall in housing provision compared to the Core Strategy.
- 4.14 Manifestly, this shortfall is significant and cannot simply be put to one side. It is striking that Welborne was identified originally to meet sub-regional needs but because it hasn't delivered it now represents a source of housing to meet in a substantial part the Borough's own housing need and thus the Borough's contribution of the wider sub-regional need is much reduced.
- 4.15 Given the strategic objective defined by the Council, and in the context of the NPPF's presumption in favour of sustainable development, this has a clear implication for plan-making in Fareham. National Planning Policy invites Local Authorities to exceed the minimum housing requirement and to adopt a positive approach to planning for future housing. Plan-making should not be a simple mathematical exercise but a fundamental examination of how to best plan for the long-term future of the Borough. In this instance, and as the Local Plan Supplement was endeavoring to achieve, this enables the Council to develop a strategy for the longer term.
- 4.16 The change of direction in the Regulation 19 consultation document appears to be framed by precisely the opposite; planning for the minimum plan period and the least amount of new development plausible. Patently, that approach does not include the flexibility which a Local Plan should provide.
- 4.17 For example, had the Regulation 19 Plan retained the level of housing calculated by reference to the published Standard Method – 520 dwellings per annum – and had a lower housing requirement in fact materialized, the practical effect of this would merely have been a housing supply strategy that would endure beyond the end of the plan period. In simple terms, the

² Policies CS2 and CS15 refer



housing strategy would cater for an addition 5 years worth of housing. Given that it is beyond comprehension that housing need will not cease after 2037, this would have been a positive, adaptable, plan-led, longer term strategy.

- 4.18 The fact that the Council has alighted upon a potentially lower housing requirement without apparently considering the practical effect of retaining the existing housing requirement manifestly demonstrates a negative, rather than positive, approach to plan making.
- 4.19 Moreover, the Sustainability Appraisal has plainly not considered this as a reasonable alternative and, as such, is flawed. The Assessment of Alternatives in Section 5 of the Sustainability Appraisal relates to development locations rather than the overall quantum of development. The PPG advises that *"a sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted"*. The purpose of testing reasonable alternatives is to determine that a Local Plan promotes sustainable development when judged against reasonable alternatives, to achieve relevant environmental, economic and social objectives.
- 4.20 This negative approach is further evident when considering the components of the housing strategy which again illustrates a do-minimum approach.

Local Housing Need

- 4.21 Application of the Standard Method to calculate the Local Plan's local housing need would require 520 new homes to be provided each year, or 8,320 new homes in total between 2021-2037.
- 4.22 Alternatively, the Regulation 19 Plan is based on 403 new homes each year which is derived from the proposed revisions to the Standard Method published as a consultation document by the Government in the Summer. These proposed revisions carry no weight at the present time and do not provide any basis for the calculation of housing need for the purpose of this Local Plan at the present time.
- 4.23 Only if the proposed revisions are carried forward without alteration by Government would this serve as a basis to underpin the Plan and enable it to be submitted. Any change to the formula, as it relates to Fareham or any of its neighbouring authorities, would require reconsideration of the housing requirement in Policy H1. The Regulation 19 Plan is contingent therefore on the outcome of that entirely separate process, rather than being a Plan which the Council is able to submit for Examination. It is, for want of a better term, a "wait and see" plan.
- 4.24 As the Council appear to acknowledge themselves by the intention not to submit the Plan for Examination until the outcome of the Government's consultation is known, it is plainly not a sound approach at the present time.
- 4.25 Little more can be said about this, other than to draw attention to the obvious difficulties that have arisen in light of the Government's consultation, which have led to a significant level of opposition to the suggested changes. As recently as mid-November the Planning Minister referred to estimates of local housing need derived from its consultation exercise as *"entirely speculative"* and indicating that the revised formula was being re-evaluated.



- 4.26 It is also important to consider when the Standard Method was introduced and the practical effects of this which the Council don't appear to acknowledge.
- 4.27 The Standard Method was introduced in 2018 and the assessed level of local housing need was based on a period of 2016 onwards. The Council appear not to have grappled with the guidance in the Planning Practice Guidance in respect of this: *"Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate"*. Plainly we are someway into the plan making process which commenced in 2017 and this requires the Council to have asked themselves how have housing completions compared with the level of local housing need from that point.
- 4.28 The published requirement was 520 dwelling per annum from 2016 onwards, whereas the highest number of completions was 349 in 2016/17 and less than half for the two years since where monitoring information is available.
- 4.29 The Standard Method takes account of backlog but only in so far as affordability will have increased in the years prior to the calculation and does not take account of underprovision since then. In these terms, the shortfall between the assessed level of housing need by reference to the Standard Method and actual completions has to be taken into account going forward.
- 4.30 The following table illustrates this:

Year	Number of Completions	Level of Local Housing Need	Shortfall
2018/2019	290	520	230
2019/2020*	263	520	257
2020/2021**	132	520	388

*Projected housing supply April 2019

**Projected housing supply June 2020

- 4.31 This indicates in the three years since the Standard Method was first published, the cumulative shortfall in housing completions is expected to be 875. No account is taken of this in the current consultation document. Even if the lower figure of 403 was taken as the level of local housing need, the shortfall would be in excess of 500 new homes.
- 4.32 In the circumstance where housing delivery in the Borough has been below both that anticipated by the Core Strategy and the measure of local housing need derived from the Standard Method, however calculated, the Council are plainly wrong to have selected a plan period that takes no account of this and a housing strategy that has no regard to that underprovision. This further undermines any notion of a positively prepared plan.

Unmet Need

- 4.33 Section 33A of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to cooperate with, *inter alia*, other local planning authorities, and engage constructively, actively and on an ongoing basis in the preparation development plan documents, so far as relating to strategic matter. Paragraph 25 of the NPPF says 'strategic policy making authorities should collaborate to identify the relevant strategic matters which they need



to address in their plans'. Unlike problems associated with soundness, a failure to discharge the obligation in Section 33A cannot be remedied once the plan has been submitted for examination.³

- 4.34 It is clear from the work of the Partnership for Urban South Hampshire that housing provision is a strategic matter and thus there is a need for co-operation between constituent plan-making authorities. In this regard, the 'plan-making' section of the PPG provides guidance in relation to the duty to cooperate. Paragraph 022 states that strategic policy making authorities are expected to have addressed key strategic matters through effective joint working, and not deferred them while relying on an inspector to direct them. It states "[An] Authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved; this will be thoroughly tested at the plan examination."
- 4.35 The consultation document makes an allowance of an additional 847 houses as a contribution to meeting unmet need from Fareham's Neighbouring Authorities. But as this is the Submission version of the Plan, this allowance should have regard to the co-operation referred to above. There is no evidence that this is anything other than an allowance made by Borough Council without reference to the joint working through PUSH; this is nothing else but a "cart before horse" approach.
- 4.36 The consultation document acknowledges that there is "*a significant likelihood of a substantial level of unmet need in the sub-region*" (para 4.4) and that over the plan period the level of unmet need in the sub-region could be circa 10,750 new homes. It is instructive that the references to unmet need in para 4.5 of the consultation document are in the context of the current Standard Method and not the higher sub-regional figure that the proposed Standard Revision indicates. In this regard, the plan appears to be "comparing apples and pears".
- 4.37 The following table compares the housing requirement from the current Standard Method and that indicated by the proposed revision.

LPA	Current Local Plan Requirement	Average Delivery (last 3 years)	Current Standard Method	Proposed new Standard Method	Difference between current and proposed SM
Portsmouth	547	328	855	730	-125
Fareham	147	310	514	403	-111
Gosport	170	145	238	309	+71
Havant	315	402	504	963	+459
Winchester	625	643	692	1025	+333
PUSH East	1804	1828	2802	3430	+628
Southampton	815	1148	1012	832	-180
Eastleigh		857	694	885	+191
New Forest	521	346	729	782	+53
Test Valley	588	834	550	813	+263
PUSH West	1924	3183	2977	3312	+335

- 4.38 The above illustrates that whilst the Fareham figure might decline, across the sub-region the

³ *Samuel Smith Old Brewery (Tadcaster) v Selby DC [2015] EWCA Civ 1104 paragraphs 38 and 40*



overall scale of housing is greater both in PUSH East and West.

- 4.39 Over a 16-year period, the difference between the proposed new Standard Method would require an additional 10,000 new homes to be built across PUSH East. Compared to average delivery over the past 3 years, almost twice as many new homes will need to be built. This is unquestionably a step change in housing delivery and each Local Authority area will need to contribute towards this and maximise its contribution to the sub-regional requirement.
- 4.40 In September 2020 the PUSH Report to its Joint Committee looked at the potential implications of housing supply relative to Local Housing Need, and using the proposed revision to the Standard Method this still identified a shortfall of over 6,500 across the PUSH East sub-region.⁴
- 4.41 At para 4.5 of the consultation document, the Borough Council put forward a contribution of 847 dwellings towards meeting unmet need. There is no evidence of how this figure has been derived. All that is evident from the earlier passages of that paragraph is the very unclear picture that exists and which is subject to additional work by PUSH. Consequently, the proposed contribution of 847 dwellings – 13% - to unmet need doesn't appear to have any basis in a full and proper assessment of future housing requirement and supply across the sub-region. This is significant because, historically, Welborne had been identified to provide housing supply for that sub-regional purpose whereas now its contribution almost entirely to meet Fareham's housing need.
- 4.42 Switching the role of Welborne in this fashion is taking away a supply of housing identified previously to meet sub-regional needs in the longer term, when plainly that need still exists, and elevating supply available to meet the Borough's need. This denies the original intention of Welbourne, and places a very heavy reliance on one source of housing to meet local needs; on the basis of the Council's strategy, some two thirds of the Borough's housing needs would be met at Welborne.
- 4.43 Again, this illustrates why preparing a Regulation 19 Plan on this basis isn't justified and does not contribute to effective planning across the sub-region.
- 4.44 Moreover, on this basis, the evidence to justify the Council having discharged its duty under Section 33A is not at all obvious; this is particularly significant as this is the Regulation 19 Plan to be submitted for Examination.

Plan Period

- 4.45 The current consultation document is based on the plan period 2021-2037. This is 16 years and would accord with the 'at least 15 years' in the NPPF, if the Local Plan were in fact adopted in 2021. Experience of Local Plan Examinations and the length of time between Regulation 19 and adoption suggests this is highly unlikely. But assuming the Plan is adopted in the 2022 this would provide the bare 15-year plan period.
- 4.46 It is in this context that one has to consider whether the plan is "*sufficiently flexible to adapt to rapid change*". For the reasons given later we say it does not meet this requirement.

⁴ Table 4 Comparison of Housing Need and Supply 2020-2036



Delivery at Welborne

- 4.47 The consultation document's housing strategy is heavily reliant on housing delivery at Welborne, which was previously identified to meet sub-regional requirements. Table 4.2 of the consultation indicates that over 4,000 new homes are to be built at Welborne by 2037 to meet Fareham Borough's local housing need.
- 4.48 This is not a realistic assumption.
- 4.49 It has been readily apparent for some time that past delivery assumptions at Welborne could not be achieved. Despite the Core Strategy and the Welborne Plan assuming a significant number of new homes would have been built at Welborne by the present time, there is still no outline planning permission some 14 months after the Borough Council's Planning Committee resolved in October 2019 to grant permission for the outline planning application (P/17/0266/OA).
- 4.50 In our response to the January 2020 Supplement, we noted that it wasn't surprising that by that time the Section 106 had not been signed given the particular scale of that development.
- 4.51 However, by the present time, the absence of an outline planning permission raises a more fundamental concern about delivery at Welborne.
- 4.52 Nowhere do the Council provide any evidence as to when they expect outline permission to be granted, the extent of any pre-commencement works and their associated timescale, when reserved matters applications are expected and when first completions will be achieved. The closest the Council gets to any justification is that the housing trajectory has been agreed with the developer Buckland.
- 4.53 We are aware that there will also need to be Highway Agreements relating to works to the M27 Junction 10 prior to those works being commenced; again, in our experience such highway agreements are complex and can take a long period of time to complete. The works to be undertaken to the M27 and A32 are substantial. The Planning Officer's Report highlights the estimated costs of these works as £80m-£90m and that funding gap exists in relation to these works. More recently, we understand the Council has had to seek additional funding from Government to cover earlier Local Enterprise Partnership funding that has since been lost. Hampshire County Council has recently confirmed that: "The J10 works are not fully committed at this stage and there is no defined timescale for delivery." This is clearly a major risk in overall terms but also in terms of when such works will be undertaken and the duration of such works.
- 4.54 This is germane to timescales as to when development at Welborne can be anticipated, notwithstanding the milestone it reached in 2019.
- 4.55 A number of housing trajectories have been proposed for Welborne at different stages. The Borough Council's January 2017 Background Paper concerning Welborne set out the Council's assumption at that time. This suggested that 4,090 new homes would be built at Welborne by 2036. Whilst this would align with the current assumption, this overlooks the fact that circumstances have already moved beyond the key dates suggested therein.
- 4.56 If the 2017 trajectory is simply rolled forward to the present day and it is assumed that outline planning permission is granted in 2021/2022 and development commences in 2023/24 then the



total number of completions would be 3,090 dwellings by 2037 – see *Appendix 1*.

- 4.57 This trajectory is clearly sensitive to assumptions. Any delay in commencing development beyond will 2023/24 will cause fewer completions in the plan period.
- 4.58 Moreover, the extent to which 250 dwellings can be built and sustained each year from 2026 onwards is also a highly sensitive assumption.
- 4.59 We note that more recent research from Lichfields⁵ suggests that for sites of more than 2000 dwellings, the average period of time from planning to delivery is 2.9 years. Moreover, that research indicates that for scheme the size of Welborne the number of houses built each year averaged 140 dwellings.
- 4.60 If a mid point between these two assumptions of 185 dwellings per annum were achieved and sustained as the peak output, this would only yield 2,360 dwellings in the plan period.
- 4.61 It is instructive to note that to achieve 4,020 completions in the plan period would require a build rate from 2024/25 onwards of 309 dwellings per annum. A build rate in excess of 300 dwellings per annum was rejected by the Council in 2017.
- 4.62 What is clear from the above is that Welborne's contribution to housing supply during the plan period has been over-estimated. This component of housing supply is not justified and consequently the housing supply strategy is not effective.

Proposed Allocations

- 4.63 From our analysis of proposed allocations we have been able to identify that, whilst a number of subject to current planning applications, a significant number are subject to constraints that could delay their development. A number of Sites are owned by public bodies or are subject to multiple landownerships and with existing uses⁶. Moreover, a great many are Sites within the urban areas which are likely only suited to flatted schemes to achieve the capacity numbers and may not be suitable to developers.
- 4.64 Other Sites are subject to nitrates constraints⁷ which may require a strategic solution to enable their release.
- 4.65 Consequently, it is questionable whether they will all be developed and this supports not only the principle of a contingency allowance but also the importance that that allowance reflects the overall level of uncertainty associated with the housing supply strategy.

Windfall

- 4.66 Table 4.2 of the consultation document includes a windfall allowance of 1,224 new homes between 2021 and 2037.
- 4.67 The principle of including a windfall allowance is explained in the NPPF at para 70 in the

⁵ Start to Finish (2016), Driving Housing Delivery (2018)

⁶ FTC1, FTC2, FTC3, FTC4, FTC5, HA7, HA13, HA22, HA24, HA31, HA36-39, HA42, HA44

⁷ HA1, HA12, HA34, HA40



following terms:

- Firstly, there should be compelling evidence that they will provide a reliable source of supply.
- Secondly, any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

- 4.68 It is evident that the above is much more than a consideration of historic windfall delivery and requires the plan-maker to actively consider future supply from this source.
- 4.69 The Council's Windfall Background Paper projects forward 51 windfall completions on small sites from 2024/25 and an additional 52 windfall completions from large sites from 2025/26. The only source of information that the Council has used to arrive at these figures is its breakdown of past windfall delivery from 2009 – 2019 which averaged 101 dwellings (51 for small sites and 52 for large sites).
- 4.70 Para 3.6 of the Background Papers states: *"The estimated rate of windfall development is based on past completion rates..."* (emphasis added)
- 4.71 Para 3.9 of the Background Paper states: *"To ensure that a cautious approach is taken and windfall projections are not overly optimistic, the projections have only taken account of windfall delivery since 2009/10".*
- 4.72 The very next paragraphs states *"Based on the preceding analysis, the windfall projections for the Borough are 51 dwellings per year from small site delivery and 51 dwellings per year from large site delivery".*
- 4.73 It is clear that the assumption in Table 4.2 of the consultation document is derived solely from past trends and it is claimed that this demonstrates *"a compelling case"*. However, nowhere in the analysis is there consideration of whether this is a reliable source of future supply, rather it is just a forward projection of what happened in the past. The analysis does not provide any consideration of expected future trends.
- 4.74 It is important to recognise that windfall opportunities are finite. Opportunities to redevelop vacant or redundant land will have largely been exhausted by the present time because of planning policies that have prioritised such sources of supply for the past decade and longer. Consequently, future windfall over the plan period will rely to a much greater extent on recycling of land (i.e. existing uses being changed). This is inevitable a less certain source of housing supply.
- 4.75 For the purpose of assessing whether the Plan's housing supply strategy is sound, we have adjusted the windfall contribution by 25% i.e. 918 completions over the plan period.

Revised Housing Strategy

- 4.76 In the preceding Sections we have considered both the level of local housing need and the housing supply strategy providing a reasoned justification why this Regulation 19 Plan is not sound. The following table illustrates the effect of this.



Housing Component	Dwellings	Notes
Local Housing Need 2021-2037	8,320	520 dpa
Under-supply 2018-2020	875	Added to reflect actual housebuilding relative to LHN
Unmet need from Neighbouring Authorities*	847	No adjustment
Strategic Housing Requirement	10,050	No adjustment
Commitments	552	No adjustment
Sites with the benefit of Resolution to Grant	838	Excludes Welborne but no other adjustment
Welborne	3,090	Reduced to reflect roll-forward of 2017 Trajectory
Allocations in the Publication Plan	1755	No adjustment
Windfall Development	918	Reduced by 25% to reflect finite supply
Total Supply	7,150	Sum of Supply estimates
Shortfall	2,900	

*retained at 13% of unmet need for illustrative purposes absent any Statement of Common Ground

- 4.77 The above illustrates that with these alternative assumptions, additional land needs to be identified for some 3,000 new homes.
- 4.78 Even if the strategic housing requirement were calculated simply by reference to 403 dwellings per annum, there would be no contingency to take account of changing circumstances over the plan period, contrary to the assertion in the plan to this effect.

Housing Component	Dwellings	Notes
Local Housing Need 2021-2037	6,448	403 dpa
Under-supply 2018-2020	nil	N/A
Unmet need from Neighbouring Authorities*	847	No adjustment
Strategic Housing Requirement	7,295	No adjustment
Commitments	552	No adjustment
Sites with the benefit of Resolution to Grant	838	Excludes Welborne but no other adjustment
Welborne	3,090	Reduced to reflect 2017 Housing Trajectory
Allocations in the Publication Plan	1755	No adjustment
Windfall Development	918	Reduced by 20% to reflect finite supply
Total Supply	7,153	Sum of Supply estimates
Shortfall	142	

- 4.79 The above analysis clearly shows that Policy H1 has not been prepared in accordance with National Planning Policy, is not justified, is not effective and is not positively-prepared. Policy H1 should be amended to increase the strategic housing requirement and for this to be phrased as a minimum, and, both because of this, and necessary adjustments to assumptions about housing supply, additional housing land should be allocated for development.
- 4.80 In the following Section we submit that the Strategic Growth Area identified in the Local Plan Supplement 2020 should be allocated for housing development.



5 South Fareham Strategic Growth Area

- 5.1 In our previous representations we supported the inclusion of Strategic Growth Areas in the Local Plan. Hallam control a substantial tract of land to the South of Fareham, adjoining the Stubbington Bypass, the construction of which has recently commenced. This land, along with other parcels in this location, is identified in Figure 3.2 of the Local Plan Supplement Consultation Document as the Proposed Strategic Growth Area South of Fareham.
- 5.2 The justification for the allocation of a Strategic Growth Areas is evident from the preceding Section which identified a significant shortage in the amount of new housing to be provided in the Borough and the amount of future development land allocated for this purpose. Development South of Fareham could provide housing land over the plan period, both in the immediate term and continuity over the long term.

South of Fareham

- 5.3 Fareham is a sub-regional centre and is the main focus for facilities and services in the Borough. The town is the largest in the Borough with a population of around 37,300. It follows that development which adjoins the existing urban area will benefit from accessibility and connectivity to these facilities and services, enhancing opportunities for active travel and supporting the vibrancy and vitality of the town.
- 5.4 Fareham is also an important economic centre, which has developed further over recent years with the success of The Solent Enterprise Zone at Daedalus to the south of the town supported by significant investment in infrastructure improvements including improvements to Newgate Lane and the Peel Common Roundabout.
- 5.5 A new, mixed use masterplanned development to the South of Fareham, contiguous with Longfield Avenue, benefits from its proximity to the town centre, Daedalus, the railway station and existing local services and amenities with good access to walking, cycling and public transport links. These are locational merits that align with *Good Growth*.
- 5.6 Stubbington and Hill Head form a single urban area and have a population of c.14,300. These settlements have a range of services with a local centre, doctors, dentists, two primary schools, a secondary school and a community centre.
- 5.7 Local employment has improved with the development at Daedalus, which lies to the south east of the settlement. Development in south Fareham would delivery homes close to this economic and employment zone, providing housing for the growing workforce.
- 5.8 The Stubbington Bypass is being constructed to connect Gosport Road, Peak Lane and Titchfield Road. This will inevitably create an urbanising influence through the centre of the existing Strategic Gap. Development to the south of Fareham would assist in assimilating the bypass into the landscape and soften the impact of the road on the gap, beyond what could be achieved from constructing the bypass alone.

Development Potential

- 5.9 Paragraph 3.24 of the consultation document identifies high-level development principles and



requirements. Hallam support these intended outcomes and these have underpinned their proposals for a mixed-use masterplanned development.

- 5.10 Work undertaken over a long period of time has identified the suitability of the land controlled by Hallam to accommodate new development, how development can be arranged and the extent of mitigation required.
- 5.11 In our response to the 2019 Issues and Options consultation, we identified potential areas for development in this location and for convenience we have attached this at *Appendix 1*. Whilst this considered only land which Hallam control, we recognise that there are other smaller scale development opportunities within the general location, and that the Borough Council intend to work with landowners and site promoters to develop a Council-led masterplan which will focus on the delivery of community benefits as part of Good Growth. In this context, Hallam are committed to working with the Council and others to develop these proposals further as part of a co-ordinated approach.
- 5.12 A development scheme could comprise the following:
- Approximately 1,200 units
 - a new healthcare facility
 - a primary school
 - a care home
 - community hub
 - local shops
 - sports hub and
 - Green Infrastructure to include public open space, equipped areas of play, Sustainable Drainage Systems (SuDS), tree, hedge and shrub planting, meadows, structural woodland planting, allotment gardens and permissive footpaths and cycleways.
- 5.13 Development would be accessed from a primary and secondary access from Longfield Avenue, along with associated improvements to the existing Long field Avenue/Bishopsfield Road junction and carriageway and a primary access from Peak Lane.
- 5.14 An outline planning application for such a proposed development was submitted in June 2020 and is presently undetermined.

Accessibility and Movement

- 5.15 The accessibility advantages of this location enables positive promotion of active travel. The proposed development will be served by an internal network of footways and access arrangements that can be utilised by both pedestrians and cyclists. The site is surrounded by Public Rights of Way (PRoW) that in turn can serve as cycle/walking connections from the site to other roads in the vicinity of the site. These will be maintained and improved in order to encourage more sustainable modes of travel as an alternative to the conventional car.
- 5.16 Bus based public transport is also a feasible means of sustainable travel from this location. Service provision on the route number X5 operated by First Group provides opportunity for peak commuter travel and also for off-peak travel. The scale of development proposed is



sufficient to deliver dedicated public transport coverage between the Site and key destinations that will have the frequency and reliability to attract patronage to secure long term viability. Any improvement will be discussed with the necessary stakeholders, but it is envisaged that the development will support the introduction of new services.

- 5.17 The Eclipse Busway - a Bus Rapid Transport scheme between Fareham and Gosport opened in 2012 providing a priority public transport route connecting the two towns. The BRT scheme provides a more efficient service using new, comfortable, low-emission buses that encourages bus travel through enhancing the bus travel experience. Using the new busway, buses are able to avoid congested parts of the highway network including A32 so that passengers can benefit from reliable journey times and can plan their onward travel connections.
- 5.18 A number of new highway improvements works have been implemented or are currently under construction which is intended to improve bus journey reliability, and encourage more people to switch from car travel to using the bus. This would have an effect of helping reduce traffic numbers and traffic congestion between Fareham and Gosport, including along Newgate Lane.

Nitrates

- 5.19 The land is located directly west of the edge of urban area that forms part of the designated Chichester, Langstone and Portsmouth Harbours Eutrophic NVZ (TraC) (Nitrate Vulnerable Zone). The land is currently predominantly arable farmland with a history of mixed crops such as wheat, barley, oats, rape etc. and break crops such as peas, winter oil seed rape and beans.
- 5.20 The above is recorded on a Nutrient plan detailing fertilizer types, tonnages and time applied for each individual field. The fertilizer applied during the period of record is a mix of pig and farm yard manures.
- 5.21 It is recognised that intense farming with fertilization with natural manures will lead to nitrate leaching into the surrounding surface water and ground water environment.
- 5.22 Through development of the land, the leeching of nitrates through farming activities will be curtailed. While there will be a new source of nitrate production and leachate associated with the new development, this is considered to be at worst a neutral impact and through further assessment a net reduction in nitrate leaching can be achievable.

Biodiversity

- 5.23 The Hallam land is divided into two areas by Peak Lane; the eastern area comprises largely of arable land with hedgerows and ditches forming the compartmentalisation typical of the surrounding arable tenure and has limited nature conservation value. The western compartment consists of a large area of set aside land, with areas of arable crops, which are bound by limited hedgerows and tree lines.
- 5.24 The most significant habitat is Oxleys Coppice which is designated as a SINC and an area of ancient and semi-ancient woodland (ASNW), which has been evaluated as county level conservation value. The Scheme can ensure that Oxleys Coppice is protected.
- 5.25 Hedgerows are mostly classified under the Hedgerow Evaluation Grade System (HEGS) as moderate and moderate/high value. Only two hedgerows are classified as 'important' under the



Hedgerow Regulations (REGS). Several drainage ditches are found through the Site but only have limited marginal and aquatic vegetation. These are classified as no more than local conservation value.

- 5.26 Surveys have identified the presence of a number of protected species, bats and breeding birds. Measures to safeguard these species and their habitats can readily be accommodated as part of the development proposed. The habitats created and the species which will benefit from the mitigation measures proposed in the Site will lead to an overall beneficial effect in the long term. Similarly, in accordance with the Solent Waders and Brent Goose Strategy, a financial contribution will be made to this, based on the classification of land's suitability for supporting such species.
- 5.27 The Solent & Southampton Water Ramsar/SPA, which also includes Titchfield Haven SSSI, is approximately 700m from the Site. Portsmouth Harbour Ramsar/SPA/SSSI is located approximately 1.3km to the east of the Site at its nearest point, which also support a variety of habitats and an assemblage of dark-bellied brent geese. The Solent Maritime SAC extends from the River Hamble mouth up to Botley in the west, this is approximately 4.7km west of the Site.
- 5.28 There is the potential for a Likely Significant Effect on the Solent SPAs from an increase in recreation from new housing development within a 5.6km zone of influence of the Solent. As a result, an Interim Solent Recreation Mitigation Strategy was published in 2014 to enable initial mitigation measures to be placed, so LAs could continue to grant permission for new homes. The strategy has been updated to form the basis for future new housing up to 2034, with the Bird Aware Solent Recreation Mitigation Strategy (2017).
- 5.29 As this Site falls within the established zone of likely significant effect (5.6km), a HRA/AA will be required by the LPA; however a site specific Test of Likely Significance will be provided to facilitate the LPA assessment. The mitigations measures required to facilitate the Proposed Development will see a financial contribution provided for the in-combination effects on the Solent SPA, with additional bespoke mitigation provided within the Site to mitigate for the alone effects.
- 5.30 The details of bespoke mitigation are to be discussed with Natural England. Current proposals will include an area of County Park/Green Infrastructure to the west of Peak Lane, measuring approximately 23ha, which will include a circular walk, car park and habitat features to provide point of interest, as well as safe areas for dogs to be exercised off the lead. Alternative areas of GI will be provided around the main residential areas to the east of Peak Lane, here approximately 32ha will be provided, which will incorporate recreational opportunities and areas of biodiversity net gain.
- 5.31 The mitigation measures provided within the Site will ensure that there are no likely significant effects on the Solent alone and in-combination with other schemes within Fareham.

Strategic Gap

- 5.32 The current Core Strategy designates land between Fareham and Stubbington as a Strategic Gap. This follows such a designation being contained within earlier Development Plans; Settlement Gap policies in Hampshire date back at least 30 years when they were included within the South and Mid Hampshire Structure Plans (1988 and 1989). They were carried forward into the Hampshire County Structure Plan 1994 and the Hampshire County Structure



Plan 1996-2011. Consequently, with each new development plan needing to make provision for current and future development needs, the role and function of gaps need to be considered having regard to up to date circumstances.

- 5.33 The Borough Council has now commissioned a new assessment of its Strategic Gaps. Whilst there are reasons why a Gap Policy should be retained, the assessment that relates to the Gap between Fareham and Stubbington rightly identified that not all of the land currently subject to that designation serves an integral purpose to retaining separation between the settlements to protect their identities. As described earlier, this new assessment concludes that land south of Longfield Avenue, west of HMS Collingwood can accommodate new development without significant adverse impact on the integrity of the Gap. Such a conclusion is similar to the assessment undertaken by Hallam previously.

Summary

- 5.34 Hallam support the identification of the Strategic Growth Area to the South of Fareham and have identified a development scheme that achieves the high-level development principles and requirements set out in the consultation document.
- 5.35 Importantly, development in this location can be brought forward that provides new homes, associated community and commercial facilities within an overall scheme that provides accessible green infrastructure and open space that will enable residents and visitors to experience a high quality of life and well-being. The accessibility of this location can be capitalised upon with investment in new sustainable and active modes of travel. By locating new development here, valued landscapes and natural environments will be preserved.
- 5.36 The merits of this location are substantial, and carefully planned development will not result in the coalescence of Fareham and Stubbington and the separate identities of these settlements can be retained.
- 5.37 As such, the allocation of land at South Fareham in the Local Plan for future development is considered wholly appropriate.



6 Policy NE5 and Policies Map

- 6.1 The Policies Map includes designations relating to Waders and Brent Geese and are associated with Policy NE5. This designation covers four categories of land – Core and Primary Support Areas, Secondary Support Areas, Low Use Areas and Candidate Areas.
- 6.2 The extent to which the land concerned is used by Waders and Brent Geese, particularly beyond the Core Areas, is transitory and can differ from time to time as a consequence of changes in agricultural practices (for example, arable land with wintering cereals provides an optimal foraging resource, whereas when this is replaced / succeeded by grassland habitats its function can change, which could affect species assemblages and regularity it is used. Changes in land use also promote further recreational uses which is the case for areas west of Peak Lane) or changes to the extent of the built environment (for example newly built structures, such as the Stubbington Bypass, will change the suitability of a location in proximity to it as a receptor). Therefore, to delineate these areas in the manner shown on a Policies Map, which affords permanence to the designation, fails to take account of the potential changes in circumstance and is not sound as a matter of principle.
- 6.3 The practical effect of this is that Policy NE5 directs the decision-maker to consider development proposals against the criteria listed therein and the status of the land by reference to the designations shown on the proposals map, which may at that point in time no longer be up-to-date or relevant.
- 6.4 Through Hallam's work in respect of the land to the South of Fareham, and through discussion with Natural England, it has identified a different classification to that shown on the Policies Map for certain of those parcels of land, as shown on *Appendix 2*. This illustrates how the application of Policy NE5 could misdirect the decision maker.
- 6.5 On this basis, these designations should not be shown on the Policies Map in the manner they are presently.
- 6.6 A more generic designation such as Areas of Waders and Brent Geese Sensitivity, which does not classify individual land parcels, would be more appropriate.
- 6.7 It would follow that Policy NE5 would be amended to require planning applications to assess and determine the use of land subject to those development proposals and at that point, when an up to date classification has been determined, the criteria and mitigation in Policy NE5 would apply.



7 Summary

- 7.1 These Representations have been prepared on behalf of Hallam Land Management Limited (Hallam), who control a substantial tract of land to the South of Fareham, adjoining the existing urban area and Stubbington Bypass, the construction of which has recently commenced.
- 7.2 This land was identified in the Local Plan Supplement 2020 as a potential Strategic Growth Area. Whilst the Regulation 19 Plan does not propose to carry forward the South of Fareham Strategic Growth Area, as is evident from these representations the need for such an allocation has not diminished.
- 7.3 The consultation document rightly identifies the Borough Council's commitment to meet the Borough's housing need by the end of the plan-period. This is plainly aligned with the NPPF and the Government's objectives. What is notably absent from the Vision and Strategic Priorities, is the recognition that Fareham is important in a sub-regional context and was previously intended to provide significant development land at Welborne to meet wider needs.
- 7.4 Policy H1 is not founded on a sound basis. In preparing and publishing this Regulation 19 Plan, the Borough Council has afforded greater weight to a potential revision to the Government's Standard Method and has disregarded the published and established measure of local housing need which has underpinned its work to date. Unless and until the Government publish a revision to the Standard Method, this version of the Plan cannot be submitted for Examination as it is plainly unsound. The Borough Council recognise this from its Committee Papers.⁸ This is nothing other than a "wait and see" Plan.
- 7.5 Only if the Standard Method is published in the same final form will the Plan be able to proceed – there is no indication if or when the Government intend to complete this exercise given the significant scrutiny it has attracted.
- 7.6 A more positive approach would have been to retain the higher level of housing as the basis of the Plan to provide surety over a long term with policy measures to manage housing supply in the event the level of local housing need was reduced. Unfortunately, the Council hasn't considered this as an option or a reasonable alternative in the Sustainability Assessment.
- 7.7 Even in the event the proposed revision to the Standard Method were confirmed as the Plan assumes, there is little if any evidence of a cogent understanding of the level of unmet need across neighbouring authorities. There is no apparent evidence of effective co-operation to justify the contribution the Plan proposes to unmet need.
- 7.8 Moreover, the Council hasn't applied its mind to the level of housing that been achieved since the Standard Method was introduced at the start of the plan making process and the date the plan is to be adopted. Viewed objectively, housing completions over that three year period were below the level of local housing need and this shortfall, which is part of a much greater shortfall when compared to the Core Strategy's housing intentions, should be accounted for.
- 7.9 Turning to housing supply, the assumption that Welborne will provide 4000 new homes within the plan period is not founded upon evidence previously produced by the Council and the level

⁸ Executive Briefing Paper 12th October 2020, para 12



of housing output assumed is at a level the Council previously considered unrealistic.

- 7.10 The windfall assumption drawn simply from past trends has not justified why this is a source of future supply. Uncertainties also exist in relation to a number of the proposed allocated sites because of landownership, extent of existing uses and location.
- 7.11 For all of the above reasons, the Plan's approach to housing will fall short of its Vision and Strategic Priorities. Policy H1 has not been prepared in accordance with National Planning Policy, is not justified, is not effective and is not positively-prepared. Policy H1 should be amended to increase the strategic housing requirement and for this to be phrased as a minimum, and, both because of this, and necessary adjustments to housing supply, additional housing land should be allocated for development.

South of Fareham

- 7.12 Fareham is a sub-regional centre and is the main focus for facilities and services in the Borough. It follows that development which adjoins the existing urban area will benefit from accessibility and connectivity to these facilities and services, enhancing opportunities for active travel and supporting the vibrancy and vitality of the town. Similarly, Fareham is an important economic centre, including the Solent Enterprise Zone at Daedalus to the south of the town.
- 7.13 It is considered that development to the south of Fareham would be in a sustainable location, with good access to walking, cycling and public transport links, as well as local services and amenities. This location adjacent to the existing urban area creates a good opportunity for a natural and sustainable extension to the urban area. Development in south Fareham would deliver homes close to an important source of new employment and jobs at Daedalus.

Strategic Gap

- 7.14 The current Core Strategy designated land between Fareham and Stubbington as a Strategic Gap.
- 7.15 The Borough Council has now commissioned a new assessment of its Strategic Gaps. Whilst there are reasons why a Gap Policy should be retained, the assessment that relates to the Gap between Fareham and Stubbington rightly identified that not all of the land currently subject to that designation serves an integral purpose to retaining separation between the settlements to protect their identities. This new assessment concludes that land south of Longfield Avenue, west of HMS Collingwood can accommodate new development without significant adverse impact on the integrity of the Gap. The delineation of the Strategic Gap on the Policies Map should be amended accordingly.

Proposed Modifications

- 7.16 The following Modifications are considered necessary for the Local Plan to be sound:
 - 7.16.1 The minimum housing requirement in Policy H1 to be defined by reference to the existing Standard Method;
 - 7.16.2 The housing requirement be increased further to take account of the low level of completions from 2018 onwards compared to the level of local housing need;



- 7.16.3 The level of unmet need that is accommodated be based on constructive, active and on ongoing engagement with neighbouring authorities;
- 7.16.4 Assumptions about the delivery of new housing at Welborne be revisited and revised down;
- 7.16.5 The windfall allowance be revised down;
- 7.16.6 Alternatively, to 6.16.4 and 6.16.5 the level of contingency be increased;
- 7.16.7 Additional housing allocations be provided for;
- 7.16.8 Land South of Fareham is allocated for housing development; and
- 7.16.9 Separate from the allocation of land South of Fareham, the boundary of the Strategic Gap south of Longfield Avenue and west of HMS Collingwood is amended so as not to include the land identified by the Borough Council's *Technical Assessment* that is not considered integral to the Gap function.
- 7.16.10 The designation associated with Waders and Brent Geese on the Policies Map should be altered with consequential changes to Policy NE5.

LRM Planning Limited
15th December 2020



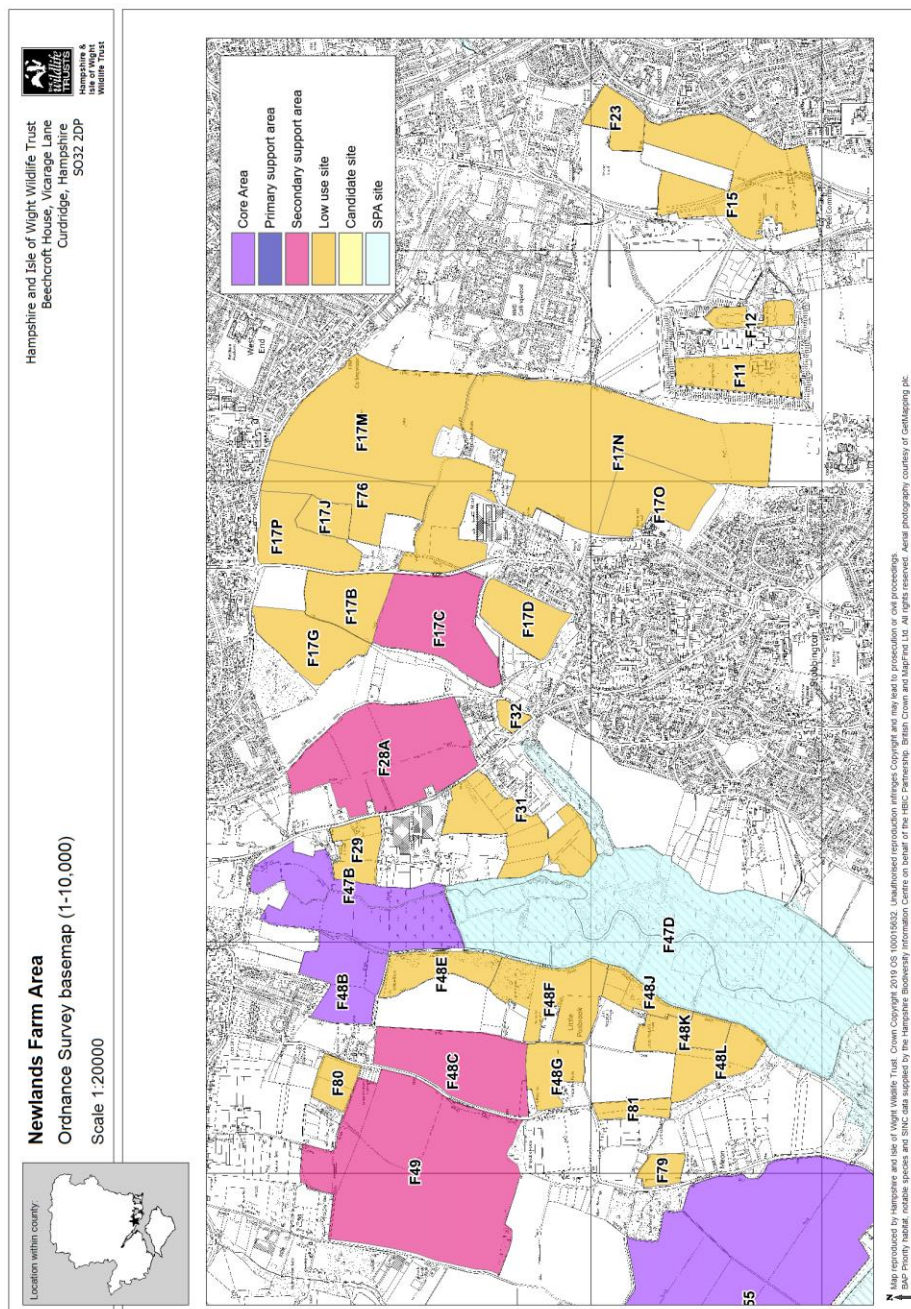
Appendix 1: Alternative Housing Delivery Trajectory at Welborne

Delivery Year	Year	Dwellings Per Annum	Cumulative Completions	Further Information
1	2016/17	0		Outline Planning Application submitted
2	2016/17	0		
3	2017/18	0		
4	2018/19	0		
5	2019/20	0		Resolution to Grant October 2019
6	2020/21	0		
7	2021/22	0		Outline Planning Permission to be Granted
8	2022/23	0		Anticipated Reserved Matters Applications for Phase 1
9	2023/24	0		Anticipated commencement of Phase 1 Site Works
10	2024/25	140	140	Anticipated first housing completions
11	2025/26	200	340	
12	2026/27	250	590	
13	2027/28	250	840	
14	2028/29	250	1090	
15	2029/30	250	1340	
16	2030/31	250	1590	
17	2031/32	250	1840	
18	2032/33	250	2090	
19	3033/34	250	2340	
20	2034/35	250	2590	
21	2035/36	250	2840	
22	2036/37	250	3090	By 31st March 2037 3090 dwellings are expected to be completed

Based on assumptions in FBC Background Paper: updating the Welborne Plan (October 2017)



Appendix 2: Newlands Farm Wader and Brent Geese support habitat





FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☒ Yes

☐ No

A2 Please provide your details below:

Title:	c/o Agent
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	Hallam Land Management Ltd
Address:	
Postcode:	
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	Mr
First Name:	Owen
Last Name:	Jones
Job Title: (where relevant)	Director
Organisation: (where relevant)	LRM Planning Ltd
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|--|-----------|
| <input checked="" type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input checked="" type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

Chapter 2 Vision and Chapter 3 Development Strategy

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Policy H1 and Policy NE15 and the Housing Supply and Sustainability Appraisal (reasonable alternative)

B1c Which part of the Policies Map?

Strategic Gap Designation and Waders and Brent Geese Designation

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

Please refer to the accompanying Representations.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Please refer to the accompanying Representations.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Please refer to the accompanying Representations.

B4c Your suggested revised wording of any policy or text:

Please refer to the accompanying Representations.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Please refer to the accompanying Representations.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.


Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Respondent details:

Title:	Mr
First Name:	Richard
Last Name:	Lundbech
Organisation: (where relevant)	Moor Construction Ltd

Agent details:

Title:	Mr
First Name:	Robert
Last Name:	Tutton
Job Title: (where relevant)	Director
Organisation: (where relevant)	Robert Tutton Town Planning Consultants Limited
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: URBAN AREA BOUNDARY (DS1)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

In the southeast corner of Portchester, Inset 12 of LPP2 shows Wicor Path linking Bayly Avenue with Castle Street. The western boundary of the Portchester (Castle Street) Conservation Area follows the line of mature trees to the west of Portchester House. Land to the north of Wicor Path is shown within the DUSB, together with houses and an office on the south side but the boundary arbitrarily passes east-west through the rectangular parcel of land that lies to the west of Anchor House- the parcel is just 28 metres deep but the northern part is shown within the DUSB, the southern part is not. In formulating the boundary, it is apparent that Fareham Borough Council recognised that development on (at least) the northern part would reinforce and reiterate a key characteristic of Wicor Path (ie residential development along its south side). Approaching the 'Land west of Anchor House' from the east, Wicor Path is characterised by brick/flint boundary walls, outbuildings, offices and houses; indeed, its built-up character has increased with the erection of a two-storey house ('Wicor Oak'). To its west, Anchor House is a chalet-bungalow that also faces north to the Path, behind a two-metre wall. Approaching from the west, one passes the long wall-with-railings of the Roman Grove Cemetery. The line of mature trees that define the west boundary of the Conservation Area turn east along the south boundary of the objection site but the DUSB does not follow it. It is submitted that the DUSB boundary should follow the tree-lined boundary along the south side of the 'Land west of Anchor House' site, not the north side of Wicor Path, as now proposed. [A drawing is being prepared for presentation under separate cover, to show the amendment to the DUSB that is requested in this submission. We would welcome confirmation of the safe and timely receipt of this written submission and the drawing. Thank you.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Show the DUSB boundary along the south boundary of the 'Land west of Anchor House', to include the land within the Urban Area..

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would reiterate the recognition of the site's development potential without the ambiguity of the existing boundary.

Your suggested revised wording of any policy or text:

n/a

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

Fareham Borough Council has consistently resisted the call to review the DUSB boundary in this locality with an open mind.

Keely, Lauren

From: James, Lauren <[REDACTED]>
Sent: 01 February 2021 10:53
To: Cutler, Nick
Subject: RE: MMO Local Plan Consultation Contact

Morning Nick,

Thank for getting in touch, hope you had a great weekend!

The email you sent us was titled: Regulation 19 Local Plan Consultation (6th November – 18th December 2020) I believe? I have been having a look to see what the issue may have been as I remember looking at this consultation and reviewing the plan, as the references to our South Marine Plan were good. There were no issues I wanted to raise. A bespoke response would highlight relevant policies that are suitable to the activities and content within your document (such as, S-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported; S-PS-2: Proposals that require static sea surface infrastructure or that significantly reduce under- keel clearance must not be authorised within International Maritime Organization routeing systems unless there are exceptional circumstances; EMP-1/EMP-2). However, I deemed this unnecessary to send to you as I believe you have considered our plans thoroughly. Our standardised response should have been sent to you upon you emailing the consultation mailbox. It definitely didn't go in your junk folder did it? Either way, I am sorry you did not receive this! Below is what you should have received:

Consultation response - PLEASE READ

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100

megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our [Explore Marine Plans](#) service.

[The East Inshore and Offshore marine plans](#) were adopted on the 2nd April 2014, becoming a statutory consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.

[The South Inshore and Offshore marine plans](#) were adopted on the 17th July 2018, becoming a statutory consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon.

The [draft North East Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The [draft North West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The [draft South East Inshore marine plan](#) was published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

The [draft South West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. Consultation closed 20th April 2020. This was the final stage of statutory public consultation before we submit the marine plan.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at planning@marinemanagement.org.uk or telephone us on 0300 123 1032.

Kind regards,

Lauren James

Marine Planner (South) | Marine Management Organisation

✉ lauren.james@marinemanagement.org.uk | 📠 07789 932734 | ☎ 02080262031

From: Cutler, Nick <NCutler@Fareham.Gov.UK>

Sent: 29 January 2021 16:57

To: James, Lauren <Lauren.James@marinemanagement.org.uk>

Subject: MMO Local Plan Consultation Contact

Hello Lauren,

Good to speak with you and Lucinda earlier.

I have checked with a colleague and I am told we notified the MMO of our Local Plan consultation sending correspondence to consultations.mmo@marinemanagement.org.uk. Might have slipped through the net though. Not a problem, just hope there wasn't any issues you wanted to raise. I'll make sure your email address is on the consultation list in future as well if helpful?

Best Wishes

Nick

Nick Cutler
Senior Planner (Strategy)
Fareham Borough Council
01329824318



This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

This message has been sent using TLS 1.2 The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Respondent details:

Title:	Miss
First Name:	Melissa
Last Name:	Marshall
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA32 - Egmont Nursery

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA32 Allocation should be removed from the development plan. HA32 is an allocation in the Hamble Valley Area of Special Landscape Quality, paragraph 3.9 of the Development plan says 'there remain no development allocations in these areas.' Inclusion of HA32 contradicts paragraph 3.9 Planning status of HA32 as noted in the Development plan reads 'Planning Status as at 1st July 2020: Outline planning permission granted (P/18/0592/OA)'. This is not true. The planning committee meeting did not take place until 19th August 2020. This could be indicative of FBC pre-determining the decision that the councillors might make and therefore be unlawful. HA32 is the subject of Judicial Review because it did not comply with the policies in the extant plan, the Nitrate calculation included as mitigation relies on untenable assumptions, the application does not include land needed to reach the public highway. The site is considered by residents, and a leading planning QC to be undeliverable due to a number of reasons & therefore should not be included in the housing allocations.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove HA32 allocation

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would remove an undeliverable housing allocation from the plan

Your suggested revised wording of any policy or text:

Remove HA32 allocation

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Keely, Lauren

From: Alan Mayes [REDACTED]
Sent: 21 November 2020 23:16
To: Consultation
Cc: Alan Mayes
Subject: Fareham local plan should include a new railway station at Welborne

Follow Up Flag: Follow up
Flag Status: Completed

I reiterate my previous comments in the email below. The building of a new railway station on the Western edge of the Welborne site is relevant for the whole of Fareham, not just for Welborne. People in existing housing in North Fareham would be able to use this new station at Welborne including by walking and cycling along the Deviation Line footpath and cycleway.

I support the railway developments proposed and supported in the attached documents

<https://www.networkrail.co.uk/wp-content/uploads/2020/07/Solent-Connectivity-Continuous-Modular-Strategic-Planning.pdf>

<https://democracy.portsmouth.gov.uk/documents/s28560/TT%2029%20Oct%2020%20-%20Solent%20Rail%20CMSP%20report.pdf>

<https://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=176&MIId=4572>

Decision:

1. Noted the contents of this report

2. Endorsed the CMSP recommended train service specification:

Portsmouth – Southampton: additional 2 trains per hour giving 4 trains per hour; and

Portsmouth – Eastleigh: additional train per hour giving 2 trains per hour.

3. Supported in principle the following CMSP recommended infrastructure measures that will be required in Portsmouth to facilitate the new services:

Agreed the reinstatement of track in platform 2 at Portsmouth Harbour station, bringing the platform back into use; and/or

Agreed the provision of an additional platform at Portsmouth and Southsea station, adjacent to the low-level platforms 3 and 4.

as high quality improvements to public transport services and supporting infrastructure in the Sustainable Transport policy on page 222 of the Fareham Local Plan 2037 as the proposed and supported more frequent train services from Portsmouth to Eastleigh and to Southampton would also serve Portchester, Fareham, Swanwick Stations and a new station at Welborne and provide these stations and Fareham residents with a greatly improved train service to key destinations including Portsmouth, Southampton, Eastleigh and Winchester. The infrastructure improvements in Fareham include making Fareham Station bay platform 2 a through platform, replacing the railway bridge over the A27 immediately South of Fareham Station and conversion of the single track line from Botley Station to Fareham Tunnels to double track. This double tracking of the line would also require a two platform station to be built at Welborne.

Alan Mayes
[REDACTED]

From: **Local Plan Consultation** <LocalPlanConsultation@fareham.gov.uk>

Date: Wed, Feb 26, 2020 at 11:27 AM

Subject: RE: Fareham local plan should include a new railway station at Welborne

To: Alan Mayes [REDACTED]

Thank you Alan. I have added your response to the local plan consultation.

Kind regards,

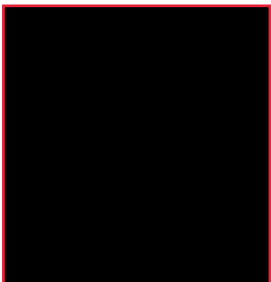
Christine Munday
Policy and Engagement Officer
Fareham Borough Council
01329824335



From: Alan Mayes <[REDACTED]>
Sent: 14 February 2020 22:40
To: Local Plan Consultation <LocalPlanConsultation@fareham.gov.uk>
Cc: Alan Mayes [REDACTED]
Subject: Fareham local plan should include a new railway station at Welborne

The Fareham local plan should include a new railway station at Welborne. This is essential to take enough traffic off the roads in Fareham to avoid severe road traffic congestion. A bus service will not achieve the necessary modal shift to public transport. If people can walk to and from the railway station in Welborne and only have to buy a rail ticket they will take the train. If people have to spend time and money travelling by bus to Fareham Railway Station to take the train they will drive and we shall have severe road traffic congestion in Fareham.

Alan Mayes



Respondent details:

Title:	Ms
First Name:	Rose
Last Name:	Maynard
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

HA 7 Reference 3088. 100 dwellings for this site is too intensive. This area borders on nature reserve and the coastal footpath is a vital to residents for leisure and recreation as well as being an important area for migratory birds. This area should not be developed to such a scale but existing buildings converted only. HA1 Ref - 3126 Page 51. (a) Again the number of houses built at 824 is far too intensive for this site, which is DESIGNATED COUNTRYSIDE and is important site for wildlife. Development numbers should be reduced allowing green space to border all road frontages so that the development doesn't impinge on existing residents. (b) There should be more access onto Lockswood Road so that Brook Lane which is a main cycle route for children going to the Secondary School are kept safe.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

It is not sound as it is focussing too much development in one small village.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Have consideration to the Designated Countryside and build on brownfield sites only.

Your suggested revised wording of any policy or text:

If this is my only chance to make a representation then you should make it easier to do so.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Jim
Last Name:	mcintosh
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 5.5

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Whilst the plan may be compliant i am concerned about the matter of the protection of the Stubbington Strategic gap

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	Simon
Last Name:	McKee
Job Title: (where relevant)	Southern (UK) Planning Manager
Organisation: (where relevant)	Veolia ES (UK) Ltd
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HA4 - Downend Road East

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Housing Allocation Policy HA4 (h) states that: 'The design of the development should take into account the close proximity to the waste transfer station with the potential for odour'. In our opinion the policy needs to go much further in directly referencing the Agent of Change principle. This point was made in our previous representation dated the 28 February 2020: In the 2018 National Planning Policy Framework (NPPF) amendments included a more prominent recognition of the 'agent of change principle' which encapsulates the position that a person or business (i.e. the agent) introducing a new land use is responsible for managing the impact of that change. There is no commentary or policy direction referenced in the plan generally or policy HA4, in respect of the agent of change and impact of residential encroachment on existing uses (incl Waste). Encroachment by sensitive development such as housing has the potential to create real issues for the ongoing operations on existing waste sites. While our waste facility has its own environmental controls it is for new applicants, bringing new uses into the immediate area, to establish and provide sufficient evidence there will be no significant issues arising post development (Agent of Change). Veolia can not retrospectively change our operations to accommodate newly introduced sensitive development nor are we required to. This needs to be referenced and explained in the local plan and preferably more formally included by way of a direct policy or policy subtext. The Agent of Change principle could also be defined in any glossary. To confirm we object to housing growth on our site boundaries (Housing Allocation HA4) without these policy safeguards in place as it is not consistent with national policy direction.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

recognition and commentary (which may include a policy amendment) on the Agent of Change principle within the plan generally and more specifically policy HA4.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

by complying with national policy direction (NPPF).

Your suggested revised wording of any policy or text:

For policy HA4 amend (h) to include reference to Agent of Change. Also look to have generally commentary within the plan.


If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To explain why the inclusion of this requirement is necessary. If a concession/amendment is acknowledged and made prior to any hearing and the inclusions agreed then attendance may not be required.

Respondent details:

Title:	Mrs
First Name:	Hilary
Last Name:	Megginson
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	Chair of resident group 'Save Warsash
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 4.2

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 4.2 of the Publication Plan is unsound because it prematurely bases housing numbers on a proposed new standard methodology for calculating need, which was consulted on in 2020 but has not been agreed by government. There has always been a tangible risk that it may not be adopted. This has been borne out by the announcement on 16 Dec. by the Ministry of Housing, Communities & Local Government stating the computer-based formula used to decide where houses should be located has been "updated" to focus more on cities and urban areas in the North and Midlands, away from rural and semi rural communities in the South East. Para 3.10 The decision to "rewild" the Stubbington Strategic Gap was made without consultation with council officers or elected Members. Instead, this announcement came via a press release issued after the start of the Full Council meeting which was in the process of debating this Plan. This clearly undemocratic and illegal. Applying the new standard method prematurely meant the housing need for Fareham was lower than the previous method resulting in them forecasting a 5 year land supply. Whilst the most up to date evidence should be used in the preparation of plans, these will now have to be revised using the 2014 based projections. This clearly means this publication plan is unsound. Applying the proposed new methodology which was clearly premature and which led to Fareham forecasting a 5 year land supply. They then prematurely agreed to take an allocation of unmet need from Portsmouth. Page 37 Paras 4.12, 4.16 and Policy HP1 Illustrates that whilst a contingency buffer of 1094 homes has been made, the Plan is heavily reliant on the certainty of delivery on 4858 houses at Welborne. The latest Housing Delivery test will not be available until after this public consultation period. The agreement is premature and therefore Policy H1 is unsound.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The plan has to apply the correct updated standard methodology for calculation need. Decisions taken on sites to be included or excluded in the plan need to be democratically selected. Premature decisions like the ones made in this plan must not be repeated in the future.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Both the sites and evidence for this plan need to be revised using the 2014 projections. Council procedures need to be reviewed to ensure a democratic rather than autocratic approach to decision making. More certainty on the council's own housing position with regard to dependency on Welborne, its ability to meet unmet need of neighbouring boroughs and the capacity to do so in respect of its 5 year land supply will avoid unnecessary taxpayer's expense such as we have seen in the preparation of this plan, the second one to be 'ripped up' and not adopted since 2017.

Your suggested revised wording of any policy or text:

References to be made to applying the recommended up to date methodology not one which may or may not be adopted in the future. Decision making to apply a sound democratic approach. Any risk regarding dependencies impacting this council's ability to deliver the plan needs to be explicit with appropriate contingency built in.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

As the representative of thousands of local residents since 2016, there is a need for them to have a voice in decisions which impact their lives. Community involvement can easily be evidenced but consideration for their concerns and suggestions is absent and has been for years. The accuracy and undemocratic approach described in my submission is replicated in a number of other topics which will be covered in future iterations of this consultation, once a correct plan is presented. They include:- Housing allocations. In particular HA1 and distribution Habitats Directive. Is the LPA meeting its legal obligations? Settlement definition. Contrary to new standard methodology and policies. Movement of boundary to fit in development rather than selecting Urban areas for development Brownfield v Greenfield sites. Are we using it to the maximum? Carbon reduction. Lack of emission and improvement targets Infrastructure. Including environmental, amenity and traffic Predetermination of members 2 live Judicial Reviews against this council. An update.

2) Paragraph: 2.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 2.1 Statement of Community Involvement says a "variety of methods" should be used to solicit comments from the public. Planned paper based documents failed to be delivered to many residents across the borough, so a large proportion of residents were disadvantaged in preparing their comments on this plan. This was exacerbated by Covid restrictions, which limited public access to libraries and the council office. This is contrary to the legal obligation on the council to involve the community. Para 1.5 Introduction Publication Plan Introduction Page 1 specifies that representations should focus solely on "Tests of Soundness" but is contradictory to FBC's guidance in Fareham Today which includes the additional areas of "Legal Compliance" and "Duty to Cooperate". This is misleading and confusing to members of the public wishing to provide commentary. Since 2017 residents' concerns regarding Fareham's approach to planning have not been considered regardless of protest marches and endless deputations and objections raised. For example, despite a petition exceeding the prerequisite number of signatures needed to trigger a Full Council meeting debate, such debate was refused, even after a challenge was raised to the Council's scrutiny Board. It is discriminatory that community generated evidence carries less weight than that provided by developer's consultants. E.g. residents challenged the previous use of land which plays a critical part in Nitrate budget calculations. At a recent appeal the inspector agreed with the views of residents and the appeal was dismissed. Similarly traffic survey results captured by Community Speedwatch teams and residents, demonstrate a huge discrepancy in the reality compared to the complex data presented by developers.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Public consultation in the true sense of the word needs to be demonstrated by this council. It should not be an 'ask and ignore' approach which at best, is all we have had since 2016. To facilitate a consultation process that a lay man would understand, communicating the proposals and implications with clarity and in plain English. The current process is complex, sometimes inaccurate and has the effect of discouraging engagement from residents, not because they don't want to but because they find the whole process off-putting, overwhelming and confusing. This Publication plan consultation is an example. It is important to overcome difficulties such as the current pandemic to ensure the public are not disadvantaged in consultations. It's important to display policies and procedures in the public domain but equally important that this council follows its own guidance not changing the rules when it suits them. Equal weight needs to be applied to all party's representation in planning decisions and this has to be evident to all concerned.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Communication of any documents that impact the public need to be written clearly and concisely. Not everyone is trained in planning law. This would help to fulfil the council's legal obligation to consult. The council encourages public involvement, as it is legally required but feedback should be provided to objections, deputations and comments such as in this plan, even if not on an individual basis. At least the public will feel their contribution has been considered even if not adopted. Measures put in place to ensure the public are not disadvantaged during consultation, particularly in the face of adversity. Not everyone uses online technology. Application of the rules at all times should be a given. If the council's rules state a petition will trigger a debate at full council if it meets the required number of signatures, that is what should happen. All evidence presented regardless of who presents it should at least be considered to carry equal weight by the council. Concerns over what may or may not happen if an application or consultation does not go the way the council want it to, shouldn't be a deciding factor.

Your suggested revised wording of any policy or text:

A 'variety of methods' used to solicit comments from the public should be expanded to 'ensure the material is easily understood.' Feedback on comments from members of the public should be provided as a matter of course. Innovative and reliable measures need to be in place to overcome unusual situations such as a pandemic, when face to face engagement is not possible, so that members of the public are not disadvantaged. Members of the public need to be clear about what they can expect when engaging with the council. A simple 'if you do this', 'we will do that' would suffice. The rules and guidance need to be executed correctly. The council needs to demonstrate how they have applied equal weight to the public's contributions and that of other representatives regardless of whether 'for' or 'against' a proposal.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

As the representative of thousands of local residents since 2016, there is a need for them to have a voice in decisions which impact their lives. Community involvement can easily be evidenced but consideration for their concerns and suggestions is absent and has been for years. The accuracy and undemocratic approach described in my submission is replicated in a number of other topics which will be covered in future iterations of this consultation, once a correct plan is presented. They include:- Housing allocations. In particular HA1 and distribution Habitats Directive. Is the LPA meeting its legal obligations? Settlement definition. Contrary to new standard methodology and policies. Movement of boundary to fit in development rather than selecting Urban areas for development Brownfield v Greenfield sites. Are we using it to the maximum? Carbon reduction. Lack of emission and improvement targets Infrastructure. Including environmental, amenity and traffic Predetermination of members 2 live Judicial Reviews against this council. An update.

Respondent details:

Title:	Mr
First Name:	Rob
Last Name:	Megginson
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 4.2

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 4.2 of the Publication Plan is unsound. It bases housing numbers on a proposed new standard methodology for calculating need, which was consulted on in 2020 but has not been agreed by government and is therefore premature. There has always been a significant risk that it may not be adopted. This risk materialized by the announcement on 16 Dec. by the Ministry of Housing, Communities & Local Government stating the computer-based formula used to decide where houses should be located has been "updated" to focus more on cities and urban areas in the North and Midlands, away from rural and semi rural communities in the South East. I suspect that this was merely a PR exercise for the Executive leader to announce reduced housing numbers and gain votes for the election in May 2020. Applying the proposed new methodology which was clearly premature and which led to Fareham forecasting a 5 year land supply. They then prematurely agreed to take an allocation of unmet need from Portsmouth. Page 37 Paras 4.12, 4.16 and Policy HP1 Illustrates that whilst a contingency buffer of 1094 homes has been made, the Plan is heavily reliant on the certainty of delivery on 4858 houses at Welborne. The latest Housing Delivery test will not be available until after this public consultation period. The agreement is premature and therefore Policy H1 is unsound. Para 3.10 The decision to "rewild" the Stubbington Strategic Gap was made without consultation with council officers or elected Members. Instead, this announcement came via a press release issued after the start of the Full Council meeting which was in the process of debating this Plan. This clearly undemocratic and illegal.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

The plan must apply the correct updated standard methodology for calculation need. Decisions taken on sites to be included or excluded in the plan need to be democratically selected. Premature decisions like the ones made in this plan must not be repeated in the future.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Revisions so that both the sites and evidence for this plan need to be use the 2014 projections. Council procedures need to be reviewed to ensure a democratic rather than autocratic approach to decision making More certainty on the council's own housing position with regard to dependency on Welborne, its ability to meet unmet need of neighbouring boroughs and the capacity to do so in respect of it's 5 year land supply will avoid unnecessary taxpayer's expense such as we have seen in the preparation of this plan, the second one to be 'ripped up' and not adopted since 2017.

Your suggested revised wording of any policy or text:

References should be made to applying the recommended up to date methodology not one which may or may not be adopted in the future and decision making to apply a sound democratic approach Any risk regarding dependencies impacting this council's ability to deliver the plan needs to be explicit with appropriate contingency built in and called out within the document

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Paragraph: 2.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

Para 2.1 Statement of Community Involvement says a "variety of methods" should be used to solicit comments from the public. Planned paper based documents failed to be delivered to many residents across the borough, so a large proportion of residents were disadvantaged in preparing their comments on this plan. This was exacerbated by Covid restrictions, which limited public access to libraries and the council office. This is contrary to the legal obligation on the council to involve the community. Para 1.5 Introduction Publication Plan Introduction Page 1 specifies that representations should focus solely on "Tests of Soundness" but is contradictory to FBC's guidance in Fareham Today which includes the additional areas of "Legal Compliance" and "Duty to Cooperate". This is misleading and confusing to members of the public wishing to provide commentary. Since 2017 residents' concerns regarding Fareham's approach to planning have not been considered regardless of protest marches and endless deputations and objections raised. For example, despite a petition exceeding the prerequisite number of signatures needed to trigger a Full Council meeting debate, such debate was refused, even after a challenge was raised to the Council's scrutiny Board. Community generated evidence carries less weight than that provided by developer's consultants and is therefore discriminatory. Residents challenged the previous use of land which plays a critical part in Nitrate budget calculations. At a recent appeal the inspector agreed with the views of residents and the appeal was dismissed. Similarly traffic survey results captured by Community Speedwatch teams and residents, demonstrate a huge discrepancy in the reality compared to the complex data presented by developers.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Public consultation in the true sense of the word needs to be demonstrated by this council. It should not be an 'ask then ignore' approach which at best, is all we have had since 2016. To facilitate a consultation process that a lay man would understand, communicating the proposals and implications with clarity and in plain English. The current process is complex, sometimes inaccurate and has the effect of discouraging engagement from residents, not because they don't want to but because they find the whole process off-putting, overwhelming and confusing. This Publication plan consultation is an example. It is important to overcome difficulties such as the current pandemic to ensure the public are not disadvantaged in consultations. It's important to display policies and procedures in the public domain but equally important that this council follows its own guidance not changing the rules when it suits them. Equal weight needs to be applied to all party's representation in planning decisions and this has to be evident to all concerned.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

The council encourages public involvement, as it is legally required but feedback should be provided to objections, deputations and comments such as in this plan, even if not on an individual basis. At least the public will feel their contribution has been considered even if not adopted. Measures put in place to ensure the public are not disadvantaged during consultation, particularly in the face of adversity. Not everyone uses online technology. Application of the rules at all times should be given. If the council's rules state a petition will trigger a debate at full council if it meets the required number of signatures, this should be applied. All evidence presented regardless of who presents it should at least be considered to carry equal weight by the council. Concerns over what may or may not happen if an application or consultation does not go the way the council want it to, shouldn't be a deciding factor. Communication of any documents that impact the public need to be written clearly and concisely. Not everyone is trained in planning law. This would help to fulfil the council's legal obligation to consult

Your suggested revised wording of any policy or text:

A 'variety of methods' used to solicit comments from the public should be expanded to 'ensure the material is easily understood.' Feedback on comments from members of the public should be provided as a matter of course. Innovative and reliable measures need to be in place to overcome unusual situations such as a pandemic, when face to face engagement is not possible, so that members of the public are not disadvantaged. Members of the public need to be clear about what they can expect when engaging with the council. A simple 'if you do this', 'we will do that' would suffice. The rules and guidance need to be executed correctly. The council needs to demonstrate how they have applied equal weight to the public's contributions and that of other representatives regardless of whether 'for' or 'against' a proposal.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Local Plan Comments December 2020 from Steve Metcalf

19 Romsey Avenue - Portchester

Romsey Ave Development - Planning application P/18/1073/FP

I must endorse the decision by Fareham Borough Council that the land south of Romsey Ave site be taken off the Local Fareham Plan.

Why:-

1. Environmental reasons, Natural England stated that any development would go against the protection of all the wildlife that use the field. Especially Brent Geese and the other Geese and waders use the field every year. Deer also use the field as its their habitat to live there.

Regarding Brent Geese, Portsmouth City Council set aside a piece of land called 'Castle Field' Southsea where decoy plastic geese were installed. They have not worked at all as Brent Geese have a lot more intelligence than that.

2. The growing of food on the field every year for over 40 years. Its mostly Grade 1 agricultural land.

That is a potential loss as a community we can ill afford, especially with Brexit.

3. The Access plan to the field south of Romsey Ave site has been proven to be both incapable of being safe and sensible but would also have been a major inconvenience to all the residence who live in Romsey Ave, Hatherley Crescent and Beaulieu Ave.

All three roads are used a 'Rat Run' at school times for both Wicor Primary School and Cams Hill Senior School.

4. The local services i.e Health Centres and Schools are already full and no account of this has been taken in account, where potentially another 600 to 1000 people would have been accommodated in Portchester.

Keely, Lauren

From: Consultation
Sent: 18 December 2020 16:13
To: Planning Policy
Subject: Cambria Land (on behalf of Michael Sparks Associates) response
Attachments: 31100 Local Plan Representation Form 17.12.2020.pdf; 31100 - Local Plan Reps Letter to Fareham BC - 18.12.20.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Matthew Thomas [REDACTED]
Sent: 18 December 2020 15:29
To: Consultation <Consultation@fareham.gov.uk>
Cc: 'Richard Powell' <[REDACTED]>
Subject: Consultation Response - Publication version of the new Local Plan

Consultation Response – Publication version of the Fareham Local Plan

Attached is a representation and supporting documentation that is being made to the consultation on the Publication version of the Fareham Local Plan.

This representation is made on behalf of a Joint Venture comprising Cambria Land Ltd and the landowners of the land at Down Barn Farm, that have been promoting this land for development to help meet the employment needs of the Borough.

The following is attached to this email:

1. Completed Representation Form
2. Accompanying Cover Letter with Enclosures

I trust that these comments will be taken into account in finalising the Local Plan.

Regards,

Matthew

Matthew Thomas MRTPI
Principal Planner

Michael Sparks Associates
Chartered Architects

11 Plato Place, St. Dionis Road, London SW6 4TU
[REDACTED]



This email message has been delivered safely and archived online by Mimecast.
For more information please visit <http://www.mimecast.com>

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?



Yes



No

A2 Please provide your details below:

Title:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

Cambria Land Ltd.

Address:

c/o Agent

Postcode:

Telephone Number:

Email Address:

A3 Please provide the Agent's details (if applicable):

Title:

Mr

First Name:

Matthew

Last Name:

Thomas

Job Title: (where relevant)

Principal Planner

Organisation: (where relevant)

Michael Sparks Associates (MSA)

Address:

Postcode:

Telephone Number:

Email Address:

m.thomas@msa-architects.co.uk

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | | |
|-------------------------------------|------------------|-----------|
| <input type="checkbox"/> | A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> | A policy | Go to B1b |
| <input checked="" type="checkbox"/> | The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

Strategic Policy E1: Employment Land Provision & Policy E5: Existing Employment Areas

B1c Which part of the Policies Map?

Identification of Down Barn Farm as an Existing Employment Area

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see cover letter

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Please see cover letter

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Please see cover letter

B4c Your suggested revised wording of any policy or text:

Please see cover letter

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ Yes, I want to take part in a hearing session

☒ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

N/A

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

18 December 2020

**MICHAEL
SPARKS
ASSOCIATES**

CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DIONIS ROAD
LONDON SW6 4TU

+44 (0)20 7736 6162
www.msa-architects.co.uk

The Consultation Team
Fareham Borough Council
Civic Offices
Civic Way
Fareham
PO16 7AZ

Dear Sir/Madam,

FAREHAM PUBLICATION LOCAL PLAN CONSULTATION

This representation is made on behalf of Cambria Land Ltd who are part of a Joint Venture (JV) company with the landowners of the land adjacent to the Down Barn Farm and Spurlings Industrial Estates. Cambria Land Ltd are promoting the site through the Local Plan process.

This follows earlier submissions to Fareham Borough Council as part of previous consultations on the emerging Local Plan and to the call for sites process, with the most recent submission having been made in February 2020 by Michael Sparks Associates on behalf of the JV company.

The land at Down Barn Farm Industrial Estate (the Site) is available and suitable to meet the objectives of sustainable development from an economic, environmental and social perspective. The proposed development will increase the supply of modern employment units to meet demand from businesses that require premises in Fareham but are unable to find suitable sites to meet their needs.

The Previous Consultation Response

The consultation response to the Revised Development Strategy and Additional Allocations that was submitted in February 2020 recommended that the land adjacent to the Down Barn Farm and Spurlings Industrial Estates is allocated for employment use and that the boundary of the proposed Area of Special Landscape Quality is realigned to exclude the proposed development site and its immediate surroundings. The reasons to support these amendments were as follows:

MICHAEL SPARKS ASSOCIATES LLP

Partners : Michael Sparks · Ashley Chambers · Anthony White · Neville Campbell · Sam Darwin · Paul Wahba · Lee Page · Rebecca Driscoll

Michael Sparks Associates LLP is a limited liability partnership, registered in England and Wales (registered number OC407290)

We use the word "partner" to refer to a member of the LLP or an employee of equivalent standing.

- The emerging pipeline of high-quality employment land is heavily reliant on the Development at Welborne coming forward in a timely manner and concerns were identified about the programme for delivery of this development and the associated improvements works to Junction 10 the M27.
- The designation of the land around the Down Barn Farm and Spurlings Industrial Estates as an Area of Special Landscape Character was not justified as this part of the site was not considered to be particularly sensitive or of high importance. Specifically, it was noted in the preliminary landscape and Visual Impact Assessment that supported the previous representations that the site was within the visual influence of the M27 motorway and would not be visible from sensitive visual receptors to the east, so the development would not have an adverse impact upon the defining characteristics of the Portsdown Hill Landscape Character Area.
- The Council's Evidence Base identified that there was a need to provide high quality land in close proximity to the strategic highway network to meet demand from occupiers requiring high quality premises in good locations built to modern specification.
- Given the uncertainty about the delivery of the Welborne development, there was therefore a need to allocate additional land to ensure that Fareham can provide sufficient land for businesses already in the Borough that are looking to expand and for those wishing to move to Fareham, which would secure inward investment.
- The proposed development at Down Barn Farm would provide this source of employment land and it is ready for development to provide new employment premises over the short-term with few constraints that would preclude development of the site.
- The development would generate a number of benefits such as contributing to economic growth, increasing access to the countryside and securing enhancements to biodiversity.

The emerging Development Framework has not included the suggested changes and is still largely relying on the employment land that will come forward at the Welborne development to meet the need for well located, high quality land supply for the Borough over the next plan period. Furthermore, the Publication version of the Local Plan will not meet the target employment floorspace of 130,000 sq m that the Partnership for South Hampshire state should be provided by Fareham.

The previous representations were made on the basis of a site area of 13.3 Ha that could provide in the region of 29,000 sq m. Following discussions with the Council, and taking on this feedback the proposed development at the site has been reduced to extend to 3.6 Ha which would provide in the region of 10,540 sq m of floorspace. The revised site location plan identifying this new boundary is provided on drawing 31100 FE 30 that is included as an Annex to this letter.

The proposed development of this site can come forward quickly as there are no ownership constraints or substantial infrastructure requirements needed to bring the site forward. The scale of the development will effectively comprise an infill development between the existing employment areas and with an appropriate landscape scheme can be developed without any

significant impact upon the Portsdown Hill Landscape Character Area. It is anticipated that subject to securing planning permission, employment premises will be available at the site in 2022.

This letter provides an assessment of the soundness of the Publication Local Plan in terms of its effectiveness and, specifically, its ability to deliver the economic outcomes it sets out to achieve.

Welborne

It is proposed that a significant proportion of new employment units for B2 and B8 development will be provided by the development of Welborne. In the Council's Evidence Base, it is noted that this development site will meet demand from occupiers that is not currently being satisfied by other sites within Fareham, largely as a result of the site's excellent location adjacent to the M27. It was noted in the evidence base document prepared by Lambert Smith Hampton that the delivery of this development was 'critical' to secure inward investment that would not otherwise occur. The development at Welborne therefore forms a significant part of the employment land supply for Fareham over the next plan period.

The Council have noted that they are confident that the Welborne development will proceed in accordance with their anticipated trajectory. However, planning permission still hasn't been granted for the development and the improvement works to Junction 10 of the M27, that are required to serve the new employment development still have no certainty on funding or delivery.

The trajectory for delivery of Welborne identified that the first phase of employment development would complete between 2019 and 2024. The employment land study that has been prepared as part of the Council's Evidence Base to support the emerging Local Plan, anticipated that the first employment units at Welborne would be available in 2025.

Within our previous representation, we identified concerns about the projected timescales for delivery of the Welborne development, identifying that this was unlikely to come forward as anticipated. We considered that the employment land would not come forward over the short term to provide the type of employment premises that were identified as being critical to the economic growth of the Borough as set out in the Council's own evidence base.

The further delays to the project over the course of 2020 indicate that the Council's trajectory for delivery of the development remain optimistic and there is a lack of certainty over the timescales associated with Welborne.

Given the uncertainty about the timescales associated with the delivery of this site and the fact that providing employment land of this nature is seen as critical to the Borough's economic growth, the Local Plan cannot be considered to be Sound unless other land with similar characteristics is allocated.

This revised proposal will therefore bridge the gap to provide a supply of modern premises in advance of units becoming available at Welborne. The development of the land adjacent to Down Barn Farm and Spurlings Industrial Estate will provide greater certainty on delivery and ensure that the Borough has a pipeline of new units coming forward to meet demand.

In addition, Down Barn Farm can provide a different type of commercial space, that is industrial and manufacturing, which would potentially be harmful to adjacent residential use, as is the case at Welborne.

Demand for employment premises

Demand for new employment premises remains strong within Fareham, and there is still a lack of available land and premises to help meet this demand. A number of occupier requirements were identified within the previous pre-application submission and these businesses as well as other newly identified occupiers are seeking premises. Copies of correspondence from these occupiers, including South Coast Concrete, TJ Transport, Pro Mech, Mimtec and Seafront are enclosed with this letter.

The sub regional work on the provision of employment land prepared by the Partnership for South Hampshire (PfSH) in their Spatial Position Statement (GL Hearn, 2016) identified that the need for additional employment floorspace in Fareham up to 2036 ranged from 325,793 to 123,961 sq m, all of which are over and above the Council's proposed allocation of land to provide 104,000 sq m of floorspace. The adjusted figure from the PfSH Spatial Position Statement then recommended that sufficient land to provide for 130,000 sq m of floorspace should be allocated by Fareham, which is still above the amount that has been provided for in the Publication Plan.

Additional land should therefore be allocated to meet the demand for premises and the identified need as set out in the Evidence Base.

The Borough's own Covid-19 Economic Recovery Plan (September 2020) specifically seeks to retain and enhance employment opportunities. This proposed development would support this objective in the short term with local investment and the retention of existing local businesses.

Requirements of the National Planning Policy Framework

For the emerging Local Plan to be considered a Sound policy document, it will need to have due regard to the National Planning Policy Framework (NPPF). Of particular relevance to the Down Barn Farm site are the following objectives of the NPPF (including our emphasis):

Paragraph 8

Achieving sustainable development means that the planning system has three overarching objectives...

- a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity*
- c) *an environmental objective...including making effective use of land*

Paragraph 23

Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period

Paragraph 81

Planning policies should:

- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.*

Paragraph 82

Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Paragraph 117

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses

Proposed Changes to the Publication Plan

The following section identifies proposed changes that we consider are necessary to make the plan Sound.

Strategic Policy E1: Employment Land Provision

This strategic policy identifies that 104,000 sq m of new employment floorspace will be provided across the plan period. This is contrary to the amount of floorspace that is identified by the Partnership for South Hampshire, which recommends that 130,000 sq of floorspace should be provided for over the plan period.

Whilst other sites apart from Welborne are identified as potentially coming forward to meet the need for employment floorspace, some of these (such as those that form part of the Daedalus allocation) are not suitable for certain types of occupiers and are too far from the strategic highway network to be considered by potential occupiers.

The NPPF is clear in requiring Development Plans to provide enough land to meet identified needs and also to make sure that a flexible supply of employment land is available in the right

location. Given that the requirements for employment land identified by the Partnership for South Hampshire are not being met in the Publication Plan and that there is considered to be an undersupply of sufficient land coming forward that is well located to the strategic highway network, additional land should be allocated in the new Local Plan.

Specifically, to ensure that the new Local Plan is Sound and has been prepared in a positive manner in accordance with the NPPF, the land at Down Barn Farm should be allocated for development to provide a more flexible source of land for employment purposes.

The Council have acknowledged that there is a need to increase the supply of employment premises within Fareham and Policy E5 of the Publication Plan relates to the intensification of existing sites to help support economic growth. There are existing occupiers that cannot find premises within Fareham to meet their needs, which indicates that there are few units available in the Borough.

Existing employment sites will only be intensified if there are vacancies that will allow new or extended premises to be built. If occupancy levels at these locations are high then intensification through redevelopment is unlikely to happen. This supports the allocation of additional land so that additional premises can be built to meet the needs of business and to support economic growth.

Policy E5: Existing Employment Areas

Spurlings Industrial Estate and Down Barn Farm are existing, established employment sites, and they perform an important employment function and they should be afforded flexibility to help them grow, adapt and support economic growth in Fareham. This proposal will intensify and extend these existing employment areas to provide the type of employment premises required by the market, which will therefore meet the objective of this policy.

The Spurlings Industrial Estate is identified as an Existing Employment Area on the draft proposal map, however the Down Barn Farm site is not. Whilst the Down Barn Farm site is used for waste processing purposes, it is not safeguarded and the activity at the site is consistent with an employment use and the adjacent barn is in use as offices. The extent of the land in employment generating uses is indicated on the location plan that supports this representation. Therefore, the Down Barn Farm site should also be identified as an existing Employment Area on the proposals map.

Conclusion

To conclude, while demand for new employment premises in Fareham is strong, there is growing evidence to suggest that the supply of employment floorspace, including the Welborne development, is not being brought forward in accordance within timescales anticipated by the Publication Local Plan. As such, this brings into question the effectiveness of the Publication Local Plan to deliver on its aims of building a strong and responsive economy in Fareham.

Furthermore, as the Covid-19 pandemic continues to have an impact on businesses across the country and unemployment is on the rise, it is of increasing importance that the Borough maximises the potential of sites that are suitable for employment development, where impacts of the development can be appropriately mitigated. Consequently, it is considered that the extension of employment land at Down Barn Farm and Spurlings Industrial Estate should be encouraged, as it can provide much-needed floorspace in the Borough, supporting the creation of jobs and building a resilient economy in Fareham, which will in turn improve the soundness of the Borough's Local Plan.

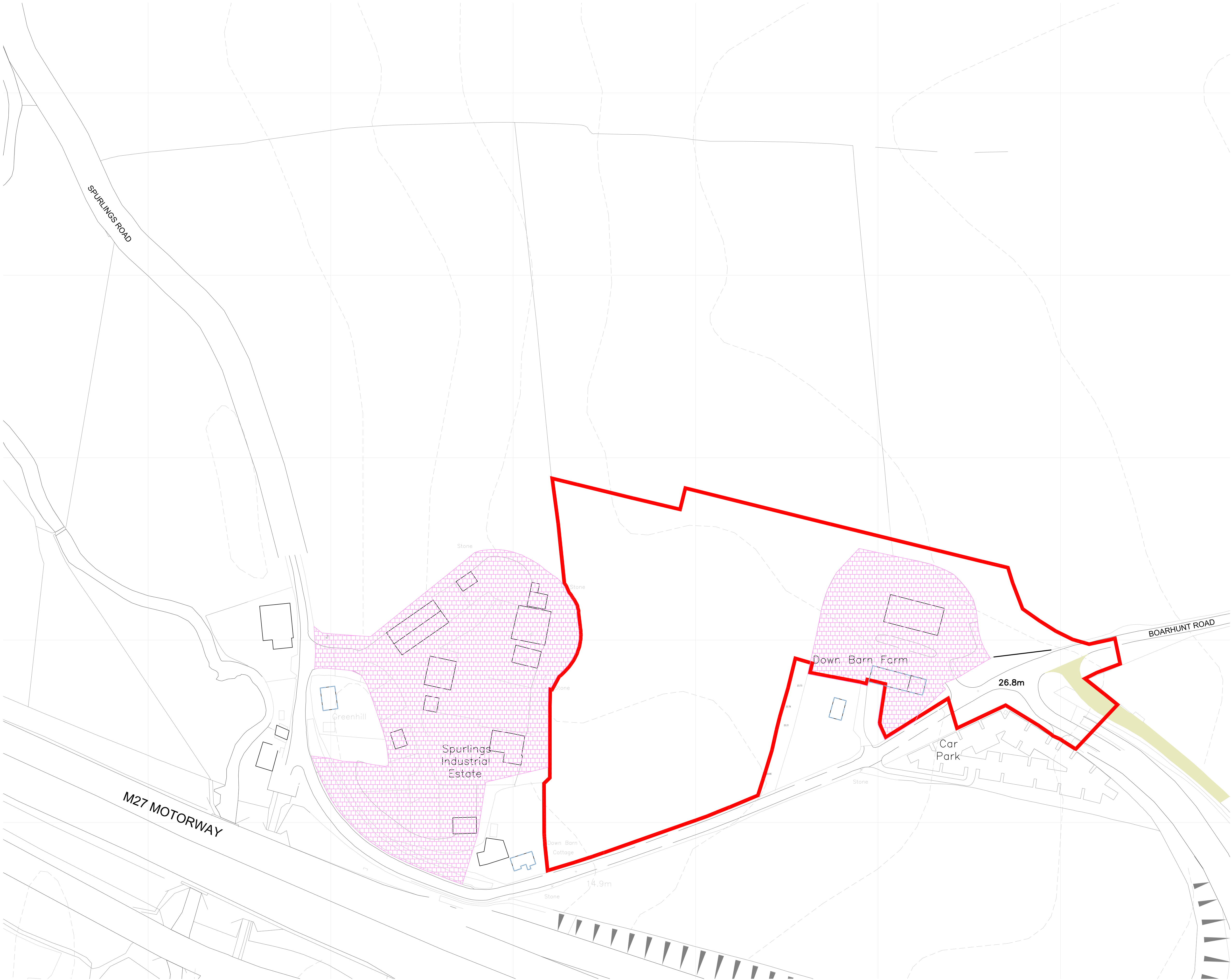
Yours faithfully,



Matthew Thomas
Michael Sparks Associates
m.thomas@msa-architects.co.uk

enc

ANNEX 1 – Site Location and Proposed Layout Drawings



NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

BASED ON OS MAP REPRODUCED BY PERMISSION OF CONTROLLER OF HM STATIONARY OFFICE (c) CROWN COPYRIGHT

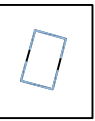
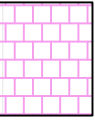

COPYRIGHT RESERVED

DO NOT SCALE THIS DRAWING


DO NOT USE ELECTRONIC VERSIONS OF THIS DRAWING TO DETERMINE DIMENSIONS UNLESS SPECIFICALLY AUTHORISED BY MICHAEL SPARKS ASSOCIATES

IF USING AN ELECTRONIC VERSION OF THIS DRAWING FIGURED DIMENSIONS TAKE PRECEDENCE AND NOTIFY MICHAEL SPARKS ASSOCIATES OF ANY DISCREPANCIES

SUBJECT TO LOCATION OF GAS MAIN

- LEGEND
-  LISTED BUILDINGS
 -  EXISTING EMPLOYMENT LAND
 -  APPLICATION BOUNDARY

..
REV	DATE	NOTE	DRAW	CHK



CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DUNGS ROAD
LONDON SW6 4TU

TELEPHONE 020 7736 6162
FAX 020 7736 3896
www.msa-architects.co.uk

TITLE

SPURLING'S INDUSTRIAL ESTATE, FAREHAM

DRAWING

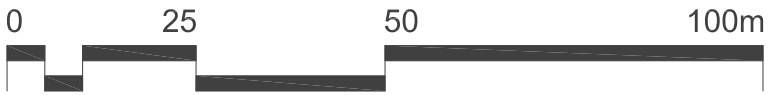
SITE LOCATION PLAN

CLIENT

DATE	SCALE	DRAWN
NOV 2020	1:1000@A1	PF
	STATUS	CHECKED
	FEASIBILITY	MT

DRAWING NUMBER

31100-FE-30





NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

BASED ON OS MAP REPRODUCED BY PERMISSION OF
CONTROLLER OF HM STATIONARY OFFICE (c) CROWN
COPYRIGHT

COPYRIGHT RESERVED

DO NOT SCALE THIS DRAWING

DO NOT USE ELECTRONIC VERSIONS OF THIS DRAWING TO
DETERMINE DIMENSIONS UNLESS SPECIFICALLY
AUTHORISED BY MICHAEL SPARKS ASSOCIATES

IF USING AN ELECTRONIC VERSION OF THIS DRAWING
FIGURED DIMENSIONS TAKE PRECEDENCE AND NOTIFY
MICHAEL SPARKS ASSOCIATES OF ANY DISCREPANCIES

SUBJECT TO LOCATION OF GAS MAIN

- LEGEND
- PROPOSED SOFT LANDSCAPING
 - APPLICATION BOUNDARY
 - PROPOSED HAUL ROAD
 - APPROXIMATE LOCATION OF GAS MAIN

AREA SCHEDULE
GIA

1	sqm	sqft
Unit	1,884	20,280
Offices	409	4,400
Sub total	2,293	24,680

2	sqm	sqft
Unit	1,043	11,225
Offices	115	1,240
Sub total	1,158	12,465

3	sqm	sqft
Unit	954	10,270
Offices	105	1,130
Sub total	1,059	11,400

4	sqm	sqft
Unit	767	8,255
Offices	88	945
Sub total	855	9,200

5	sqm	sqft
Unit	1,778	19,140
Offices	174	1,875
Sub total	1,952	21,015

6	sqm	sqft
Unit	1,490	16,040
Offices	164	1,765
Sub total	1,654	17,805

7	sqm	sqft
Unit	1,405	15,125
Offices	166	1,785
Sub total	1,571	16,910

TOTAL	10,542	113,475
-------	--------	---------

	Ha	acres
SITE AREA	3.702	9.15



CHARTERED ARCHITECTS

11 PLATO PLACE
STUDIOS ROAD
LONDON SW6 4TU

TELEPHONE 020 7736 6162
FAX 020 7736 3696
www.mso-architects.co.uk

TITLE

SPURLING'S INDUSTRIAL ESTATE, FAREHAM

DRAWING

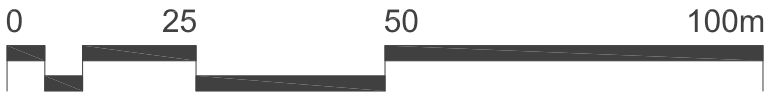
SITE LAYOUT PLAN

CLIENT

DATE	SCALE	DRAWN
NOV 2020	1:1000@A1	PF
	STATUS	CHECKED
	FEASIBILITY	MS/GZ/MT

DRAWING NUMBER

31100-FE-31



ANNEX 2 – Occupier Letters

Graham Moyse,
Down Barn Farm,
Boarhunt Road,
FAREHAM,
Hants
PO17 6AJ

26th November 2020

Dear Graham,

I am writing to confirm interest in the new development of industrial units at Down Barn Farm. We are an established local business with our premises located near Wickham Road, Fareham.

We are looking to expand our premises to a unit of approx. 12,000 sq ft in size, complete with staff parking and a small office. This will help to accommodate the extra 10-20 staff we are looking to employ.

The new premises will need to be situated near the m27 and our existing site at junction 10 in Fareham. We would be looking to move in within the next 1-2 years ideally.

Should you be successful in acquisition of planning permission, we believe the planned development at Down Barn Farm would accommodate our expansion requirements.

Yours sincerely



Mark Waring

Managing Director

Graham Moyse
Estate Office
Downbarn Farm
Boarhunt Road
Fareham
PO17 6AJ

23 November 2020

Dear Mr Moyse

Ref: Proposed Industrial Development - Downbarn Farm and Land Fareham

I understand that you will be seeking planning for a development on land adjacent to Downbarn Farm for industrial and warehousing use. As a well-established local company whose existing premises will be affected by its re-development as part of the Welborne plan, I would like to register our interest in securing new accommodation close by at Downbarn Farm.

We are a Fareham based marine wholesale and retail business with 20 employees wishing to stay within the borough and we would like to secure a long-term lease on a warehouse of approximately 20,000 ft with offices.

I understand that your proposed development, if successful at planning, would be able to accommodate this requirement and I would welcome details of occupational terms from you when convenient.

Yours sincerely



R Besse

Managing Director
Seafront Marine Group Limited



Pro Mech Limited

Head Office: 7A, The Gardens, Fareham, PO16 8SS
Accounts Tel: 01329 725002 Fax: 01329 288535

Down Barn Farm
Boarhunt Road
Fareham
Hampshire
PO17 6AJ

Dear Graham,

Further to our conversation regarding the expansion of our operations at Pro Mech, I would like to formally register our strong interest in the possibility of acquiring a larger site at Spurlings Industrial Estate. We are keen to stay at Spurlings as it is an ideal location for our operation as well as having a large locally based workforce.

We have now been based here for 18 years and currently employ 22 people. The current site occupies 0.8 acres with 6,600 sq ft of accommodation and 29,000 sq ft of hard standing, which you recently upgraded for us. We estimate our ideal operational requirement is an additional 21,000 sq ft of hard standing. We would happily expand at our existing location by taking on the site currently used by South Coast Concrete Pumping.

This existing hard standing would be ideal for us to store additional equipment and park more of our vehicles. If we could expand our business, we would look to employ an additional 10 – 15 new members of staff.

We would be very keen to understand further if this is a possibility.

Your Sincerely,



John Cooper
Managing Director
Pro Mech

South Coast Concrete Pumping Ltd

Unit 14 Spurlings Industrial Estate, Fareham, Hampshire, PO17 6AB.
United Kingdom

Tel: 01329 232220 Fax: 01329 287953 Web: www.southcoastpumping.co.uk

Mr G Moyse
Down Barn Farm
Boarhunt Road
Fareham
Hampshire
PO17 6AJ

Dear Graham

I am writing to confirm our conversations exploring an expansion of operations for South Coast Concrete Pumping at Spurlings Industrial Estate on Junction 11.

I am delighted to report that our current operation at Spurlings Industrial Estate is going from strength to strength and we are now in a position where we would like to expand our business. We are keen to stay at Spurlings Industrial Estate as it is an ideal location for our operation and as a local established business myself and my team are keen to stay in the area. We have now been based here for 25 years and currently employ 40 people and run 25 trucks from Spurlings Industrial Estate.

We currently occupy 0.5 acres with 3,600 sq ft of accommodation and 20,000 sq ft of hard standing. We need more space to expand our business to accommodate for 8 new trucks, including 8 new drivers, 2 new workshop staff and an apprentice. We estimate our ideal operational requirement is 1.4 acres with 7,100 sq ft of accommodation and 32,000 sq ft of hard standing. We would happily expand at our existing location, however there is not enough space for us to expand within Spurlings Industrial Estate. We feel our best option would be to move our operation to a field adjacent to Spurlings Industrial Estate.

We understand you are promoting an extension to Spurlings with Fareham Borough Council and would like to register our firm interest in remaining here in an expanded facility should the site come forward in the near future.

Yours sincerely



Mr G Moyse
Down Barn Farm
Boarhunt Road
Fareham
Hampshire
PO17 6AJ

Dear Graham,

I am writing to confirm our conversations exploring a relocation of TJ Waste and Recycling from Charity Farm, Wickham Road, Fareham to an expanded Spurlings Industrial Park on Junction 11.

As you know our current operation at Charity Farm sits within the proposed new garden village of Welborne. The owner, Buckland Developments Limited, is progressing a planning application for a new settlement and has indicated that he will soon be serving us a notice to quit and we will no longer be able to operate from this site.

As a local business we are keen to stay in the area, having been based here for 15 years. Our ideal operational requirement is 4/5 acres with 7000 sq ft of accommodation and 85,000 sq ft of hard standing. We understand you are promoting an extension to Spurlings with Fareham Borough Council and would like to register our firm interest in relocating here should the site come forward in the near future.

Yours sincerely



John Gosling
Managing Director

From: Nick Millett [REDACTED]
Sent: 18 December 2020 12:59
To: Consultation
Subject: RE: Winnham Farm (E of Downend Road) planning application

Follow Up Flag: Follow up
Flag Status: Flagged

Hi

This was in response to a specific planning application (Downend P/20/0912/OA), however, looking at the Local Planning Consultation, I do have some comments.

1. Very comprehensive and detailed! Apologies if some of my points below are explicitly addressed, however my time is limited to review the document(s).
2. General comment – it is feared by many in the area that while applications may be approved, once built they will not perform to expectations. I suggest that contracts include a significant/punitive element of retention – if the promised benefits (some or all) are not realised, that retention is used to address the problems that have been introduced – either by the responsible agents/contractor(s) or their replacements.
3. Where is linkage with National policies –
e.g. 1.47 – key reason that Fareham Shopping Centre is dying is that business rates are too high – and these are not managed by Fareham Council.
4. 2.6, 2.10 Ambience in Fareham is getting visibly worse with obvious drug abuse, begging and the dying shopping centre. What are the actions/timelines to address these?
5. 3.4 Good Growth – This should not allow high volumes of traffic through/adjacent existing housing – access by local residents (particularly peak times 0830-0930, 1630-1800), pollution, noise.
6. 3.42 I watched recent proceedings for Downend Planning Application P/20/0912/OA. There was little credibility with the councillors for the traffic modelling provided (I.e. they didn't believe what was being presented).
What can be done to ensure the analysis stands up to the real world situation under proposal? I also am not convinced they model accurately for peak traffic combined with bad weather (0830-0930, 1630-1800) when traffic is at it's worst - everyone using their cars instead of walking/cycling/public transport. We live in the UK and it rains a lot, so don't assume a balmy summers day for the analysis!!
7. 3.9 – I understand that currently there is no limit on the number of appeals that can be made for a development – can this be reduced to a reasonable number, e.g. 3 to avoid abuse, nuisance and fatigue of the process?
8. 4.4 – why should Fareham be responsible for another organisations Unmet Need? This creates additional pressure in the area, which is not desirable.
9. 4 - Interesting that Cams Golf Course not considered for development – good location for motorway, although similar traffic issues compared to Downend.
10. 7.8 – diverse night time choices – significantly reduced if developments from Railway station to Osborn Road are put in place.
11. 9.98 – In addition to Air quality (risk to life, e.g. Ella Kissi-Debrah death due to traffic pollution), what about other Quality of Life indicators – resultant heat/cold, humidity, moisture loss (air, soil) noise, traffic volumes?
12. Figure 9.2 – there should be an AQMA for A27/Downend/Motorway roundabout.
13. 10.6 – ensure REALISTIC expectations of sustainable transport. Experience is that projections are optimistic, leaving the residents to live with the resultant mess afterwards!
Ensure older population (e.g. 80 year olds) is explicitly addressed – lower mobility (up and down hills), shorter walking distances, lack of car, timely access to public transport, access to emergency support/vehicles.
14. 11.64 – what about garden space minima? Car Parking? Cycle Parking? Electric Charge Points for cars?

I look forward to your responses.

Regards
Nick Millett

From: [Consultation](#)
Sent: 17 December 2020 15:41
To: [Nick Millett](#)
Subject: RE: Winnham Farm (E of Downend Road) planning application

Dear Mr Millett

Thank you for your email. Could you confirm that this is in response to the Local Plan Consultation or in response to a specific planning application?

Kind regards

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Nick Millett [REDACTED]
Sent: 17 December 2020 13:18
To: Consultation <Consultation@fareham.gov.uk>
Subject: Winnham Farm (E of Downend Road) planning application

Dear sir

I am pleased that outline planning has again been rejected for Winnham Farm (E of Downend Road). However this was only rejected through the casting vote of the chairman.

Bearing in mind the likely traffic chaos (both during building phase and afterwards) for school children, cyclists, pedestrians and drivers as well as the resultant air pollution and impact on quality of life for local residents (ref recent High Court confirmation of death of a London child Ella Kissi-Debrah due to traffic pollution) - Is there any way that the appellant can be limited to a finite number of appeals?

Please can resident's quality of life, air quality, traffic noise/pollution exposure be resubmitted as part of the discussion (since the only issue currently under discussion is the rail bridge's ability to handle traffic). At least as important is the health and quality of life for residents in the Downend area – as well as those who might live in the proposed development.

Regards
Nick Millett

This email (and its attachments) is intended only for the use of the person(s) to whom it is addressed and may contain information which is privileged and/or confidential. If it has come to you in error, you must take no action based on it nor must you copy or show it to anyone.

This email is confidential but may have to be disclosed under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004. If you are not the person or organisation it was meant for, apologies. Please ignore it, delete it and notify us. Emails may be monitored.

Respondent details:

Title:	Mr
First Name:	Robert
Last Name:	Milliken
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Policies map: BRENT GEESE & WADERS CLASSIFICATION 2 - PRIMARY SUPPORT AREA (© HBIC) (NE5)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

Dear Sirs and Mesdames, Regarding The Romsey Avenue site The Wicor coastal zone has special protection for Solent Waders and Brent Geese. As Romsey Avenue farmland is the highest quality grade and one of the last remaining agricultural areas adjacent to the Portsmouth Harbour SPA, it seems to make sense to me to give it the protection of strategic policy DS3, by extending that protection to the farmland that borders the recreation ground. This would help to form a 40 hectare countryside gap. Some sites already listed have no greater landscape quality than this farmland. Natural England have rejected development on this Romsey Avenue site describing this area as supporting habitat for Portsmouth Harbour SPA and a Primary Support Area under the Solent Waders and Brent Goose strategy. Yours faithfully, Rob Milliken

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Dear Sirs and Mesdames, Regarding The Romsey Avenue site The Wicor coastal zone has special protection for Solent Waders and Brent Geese. As Romsey Avenue farmland is the highest quality grade and one of the last remaining agricultural areas adjacent to the Portsmouth Harbour SPA, it seems to make sense to me to give it the protection of strategic policy DS3, by extending that protection to the farmland that borders the recreation ground. This would help to form a 40 hectare countryside gap. Some sites already listed have no greater landscape quality than this farmland. Natural England have rejected development on this Romsey Avenue site describing this area as supporting habitat for Portsmouth Harbour SPA and a Primary Support Area under the Solent Waders and Brent Goose strategy. Yours faithfully, Rob Milliken

How would the modification(s) you propose make the Local Plan legally compliant or sound?

Dear Sirs and Mesdames, Regarding The Romsey Avenue site The Wicor coastal zone has special protection for Solent Waders and Brent Geese. As Romsey Avenue farmland is the highest quality grade and one of the last remaining agricultural areas adjacent to the Portsmouth Harbour SPA, it seems to make sense to me to give it the protection of strategic policy DS3, by extending that protection to the farmland that borders the recreation ground. This would help to form a 40 hectare countryside gap. Some sites already listed have no greater landscape quality than this farmland. Natural England have rejected development on this Romsey Avenue site describing this area as supporting habitat for Portsmouth Harbour SPA and a Primary Support Area under the Solent Waders and Brent Goose strategy. Yours faithfully, Rob Milliken

Your suggested revised wording of any policy or text:

Dear Sirs and Mesdames, Regarding The Romsey Avenue site The Wicor coastal zone has special protection for Solent Waders and Brent Geese. As Romsey Avenue farmland is the highest quality grade and one of the last remaining agricultural areas adjacent to the Portsmouth Harbour SPA, it seems to make sense to me to give it the protection of strategic policy DS3, by extending that protection to the farmland that borders the recreation ground. This would help to form a 40 hectare countryside gap. Some sites already listed have no greater landscape quality than this farmland. Natural England have rejected development on this Romsey Avenue site describing this area as supporting habitat for Portsmouth Harbour SPA and a Primary Support Area under the Solent Waders and Brent Goose strategy. Yours faithfully, Rob Milliken

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

Respondent details:

Title:	Mr
First Name:	James
Last Name:	Morgan
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: HP2 - New Small-scale Development Outside Defined Urban Areas

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

I believe small scale development is important in providing necessary bespoke housing to an area and often helps to safeguard the environment which it sits within while enabling bespoke houses which utilise the best technology and sustainable techniques in what could perhaps be described as sensitive / valuable locations.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

2) Policy: HP9 - Self and Custom Build Homes

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

I would also like to support HP9 by with a caveat that HP8 should look to promote one off self build and custom build properties which would fall under HP2. Custom build within areas of special landscape quality should also be considered on their merits especially where they would effectively be a partial infill on a road where previous development has been permitted or planning granted such as the site between Egmont Nurseries and Cawtes Reach on Brook Avenue. The urban area boundary should be moved to include Yorkdale, Cawtes Reach and Egmont Nurseries and all the land in-between this area.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

none

How would the modification(s) you propose make the Local Plan legally compliant or sound?

I would move the defined urban settlement boundary as previously state.

Your suggested revised wording of any policy or text:

none

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

3) Policies map: URBAN AREA BOUNDARY (DS1)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

I believe the urban area boundary on Brook Avenue needs adjusting to include Yorkdale, Cawtes Reach and all the parcels of land in-between this. The area no longer fits in with DS3 and should be adjusted accordingly.

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Adjust plan as previously suggested on Brook Avenue, Warsash.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would encompass areas already developed along with areas which already have outline planning and those sites in-between.

Your suggested revised wording of any policy or text:

None

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

4) Policy: NE5 - Solent Wader and Brent Goose Sites

Legally compliant	Yes
Sound	Yes
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

These sites need protecting into the future.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I don't want to take part in a hearing session

From: David Mugford <[REDACTED]>
Sent: 29 November 2020 19:47
To: Consultation
Subject: Fareham Local Plan 2037

Follow Up Flag: Follow up
Flag Status: Flagged

For Fareham Planning Department.

I must first recognise how much thought and work has gone into the Plan, and it reads well. Congratulations to the authors, who know their subject in such detail. Most of it I agree with, without reading every word, but comments have been invited.

Strategic Priorities. Para 2.21 (5). I think a vibrant future for the town centre might be positive with increased housing, ie FTC1, FTC2 and FTC6, but all these developments remove some existing parking space, or add to a car parking problem. If there is no new parking, where will out of town shoppers park their cars? Perhaps hidden within the text is an assumption that FBC can do nothing to halt changes to the retail trade: from increased IT shopping, click and collect, and the demise or closure of retail chains and local businesses. This was happening before the Covid19 outbreak, but has become much worse. So will people come from outlying communities like Stubbington, as they will not be able to buy what they want in Fareham anyway. I believe FBC will have to consider lowering business rates to counter balance lower footfall, or give help with high rents to encourage more local shops and businesses. Maybe entertainment options might bring some life to the centre. Whiteley is the main shopping centre for Fareham now, which unfortunately comes under Winchester. I would suggest that para 2.21 needs greater vision if the town centre is to survive, albeit in a different form than today.

Strategic Gap. Para 3.9 and 3.10. Para 3.9 reads positively, but 3.10 says 'a redefinition' does not preserve the size or shape of the existing. This is reinforced when read in conjunction with para 3.44 'spatial definition tightened', and 'redrawing boundaries' in para 3.46. I fear for the future of Strategic Gaps when referring back to Strategic Growth Areas in para 3.20: are these potential new SGAs, or a yet again redefinition of Strategic Gaps? My confidence in the existing SGs being retained is seriously diminished, and these conflicting phrases do not create trust in the FBC future decision making on this topic.

On this same topic of the boundaries of the Meon SG, I would greatly appreciate having or seeing a map of the Meon SG area, as my house backs on to open fields looking west to the river. This would help me to comment on any future development submission which involves land on the east side of the river along Old St and further north to Titchfield Road. Thank you.

Housing Allocation Policy HA3. What will happen to the existing business within this development outline?

Housing Allocation Policy HA41. I read this with interest, as it is local to me. A very interesting development, original thinking. But where will the residents park their cars without denying existing shoppers? And how will they be able to recharge batteries as there is no parking at the back of the existing building?

Employment. Two development sites are on Solent airfield, and the third at Whiteley. None of these is served by any form of public transport, so private transport will be essential. Does this fit with climate change? Or is it assumed e-vehicles of one sort or another will be commonplace after 2037? But in the meantime? Any thought about discussing new or revised bus routes with the bus companies?

Air Quality and Transport. Reading these as a current and topical issue worldwide, the policies read well, yet I feel quite strongly that there is something the FBC can do (other than address the issue for future planning applications) to reduce existing levels of pollution. Why not plan for the Strategic Gap between Fareham and Stubbington/Hill Head/Lee to be heavily planted with trees in the spaces between the new by-pass and existing dwellings to lower Co2 levels? This would help the environment, nature, keep communities separate, provide recreation space for good mental health, and improve air quality, all in the one exercise. More trees throughout the borough is already being studied, I understand. Central government will set the pace for reducing fossil fuel emissions, phasing out petrol and diesel. I feel the cost of e-vehicles will be prohibitive compared with existing cars, so the number of vehicles may fall. This will drive the need for better public transport. Locally, this should be a much better bus service, not just a

trunk route service as we have today in Stubbington. But I doubt that any bus service could meet the needs of the elderly, handicapped, young and old, and be available throughout the day, or be affordable. Nevertheless I would like to have found more sense of action or need in words on this under either of these two headings, and also something about car charging ports in the Housing Policy section. FBC has to lead on this last point, I believe.

Having struggled to page 244, I'm done for. But again, a very exhaustive Plan with many specialisations, and an eye opener for the uninitiated, which is me!

Thank you for your patience in reading this.


David Mugford

19 The Oakes, Stubbington, Po14 3TP



Virus-free. www.avg.com

Respondent details:

Title:	mr
First Name:	R A K
Last Name:	Murphy
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 1.2

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

housing need of local persons out of date as it has a long term downward trend. local need is not met by estate agents putting properties on the open market

What modification(s) is necessary to make the Local Plan legally compliant or sound?

consultation to all households

How would the modification(s) you propose make the Local Plan legally compliant or sound?

supply hard copy when requested. not everyone has easy access to internet

Your suggested revised wording of any policy or text:

the council will supply written copies on request

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

AS an accountant and committee member of many community groups, I am used to delivering results, which this document fails to do

2) Paragraph: 2.4

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

housing on flood plains and marshland not identified

What modification(s) is necessary to make the Local Plan legally compliant or sound?

excluding unsuitable sites

How would the modification(s) you propose make the Local Plan legally compliant or sound?

remove the property speculators ability to sell cardboard houses on marshland to gullible buyers

Your suggested revised wording of any policy or text:

all sites have been tested for poor drainage and toxic residues

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

As accountant for a large property company and having bought and sold houses, I can help the council close the loopholes used by companies in the in the borough over the last 40 years

3) Paragraph: 2.1

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

this particular town requires social housing , not properties for sale out of the reach of most young families or the disabled or veterans

What modification(s) is necessary to make the Local Plan legally compliant or sound?

replacing the affordable definition with one that aligns with reality

How would the modification(s) you propose make the Local Plan legally compliant or sound?

gets the result it aims for, not the building of cardboard houses

Your suggested revised wording of any policy or text:

provision of social housing , not affordable housing

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

having experience in property in various parts of the country, I can help achieve realistic results which the plan may not do

4) Paragraph: 2.12

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

high quality design has not been supplied by property speculators to date

What modification(s) is necessary to make the Local Plan legally compliant or sound?

provision of social housing specified by the councils excellent housing maintenance dept

How would the modification(s) you propose make the Local Plan legally compliant or sound?

achieve the objectives stated

Your suggested revised wording of any policy or text:

replace "affordable housing " with social housing throughout the document as the definition is fundamentally flawed

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

used to committee procedures and providing brief and on point contributions

5) Paragraph: 4.3

Legally compliant	No
Sound	No
Complies with the duty to co-operate	No

Please provide details you have to support your answers above

existing local households have to compete with buyers from anywhere when private property companies are involved, so the aims are unachievable

What modification(s) is necessary to make the Local Plan legally compliant or sound?

council houses built in conjunction with housing associations as achieved in many parts of the country

How would the modification(s) you propose make the Local Plan legally compliant or sound?

get the results aimed for

Your suggested revised wording of any policy or text:

the Welbourne numbers can be piled into the first ten years , so there can be a moratorium on speculative planning applications for this period

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it necessary to take part in the hearing session(s):

I have extensive inside knowledge of how companies renege on assurances

Keely, Lauren

From: National Grid (Avison Young - UK) <[REDACTED]>
Sent: 10 December 2020 13:37
To: Planning Policy
Subject: Local Plan Regulation 19 Consultation
Attachments: Fareham BC - Local Plan Reg 19 - Response letter - Dec20.pdf; Fareham BC - Local Plan Reg 19 Asset Map HA3.pdf; Fareham BC - Local Plan Reg 19 Asset Map HA19.pdf; Fareham BC - Local Plan Reg 19 Asset Map HA38.pdf

Dear Sir / Madam

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Kind regards

Chris Johnson

Chris Johnson MRTPI
Planner



Avison Young, Central Square South, Newcastle, NE1 3AZ

**AVISON
YOUNG** [Twitter](#) | [Property Listings](#)
[LinkedIn](#) | [Instagram](#)

Avison Young – Avison Young Planning and Regeneration Limited | [Legal Disclaimer](#)

Our Ref: MV/ 15B901605

T +44 (0)191 261 2361
F: +44 (0)191 269 0076

09 December 2020

avisonyoung.co.uk

Fareham Borough Council
Via Email only

Dear Sir/ Madam
**Local Plan (Regulation 19) Consultation
November-December 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.

Details of the sites affecting National Grid assets are provided below.

Electricity Transmission

Development Plan Document Site Reference	Asset Description
HA3, HA38	4YE Route TWR (001-002) - 400Kv Overhead Transmission Line Route: Botley Wood – Fawley
HA19	4YE Route TWR (001-022) - 400Kv Overhead Transmission Line Route: Botley Wood - Fawley

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jeffries, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRIPI
Director
0191 269 0094
matt.verlander@avisonyoung.com
For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.co.uk/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgrid.co.uk/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgrid.co.uk/land-and-assets/working-near-our-assets

How to contact National Grid

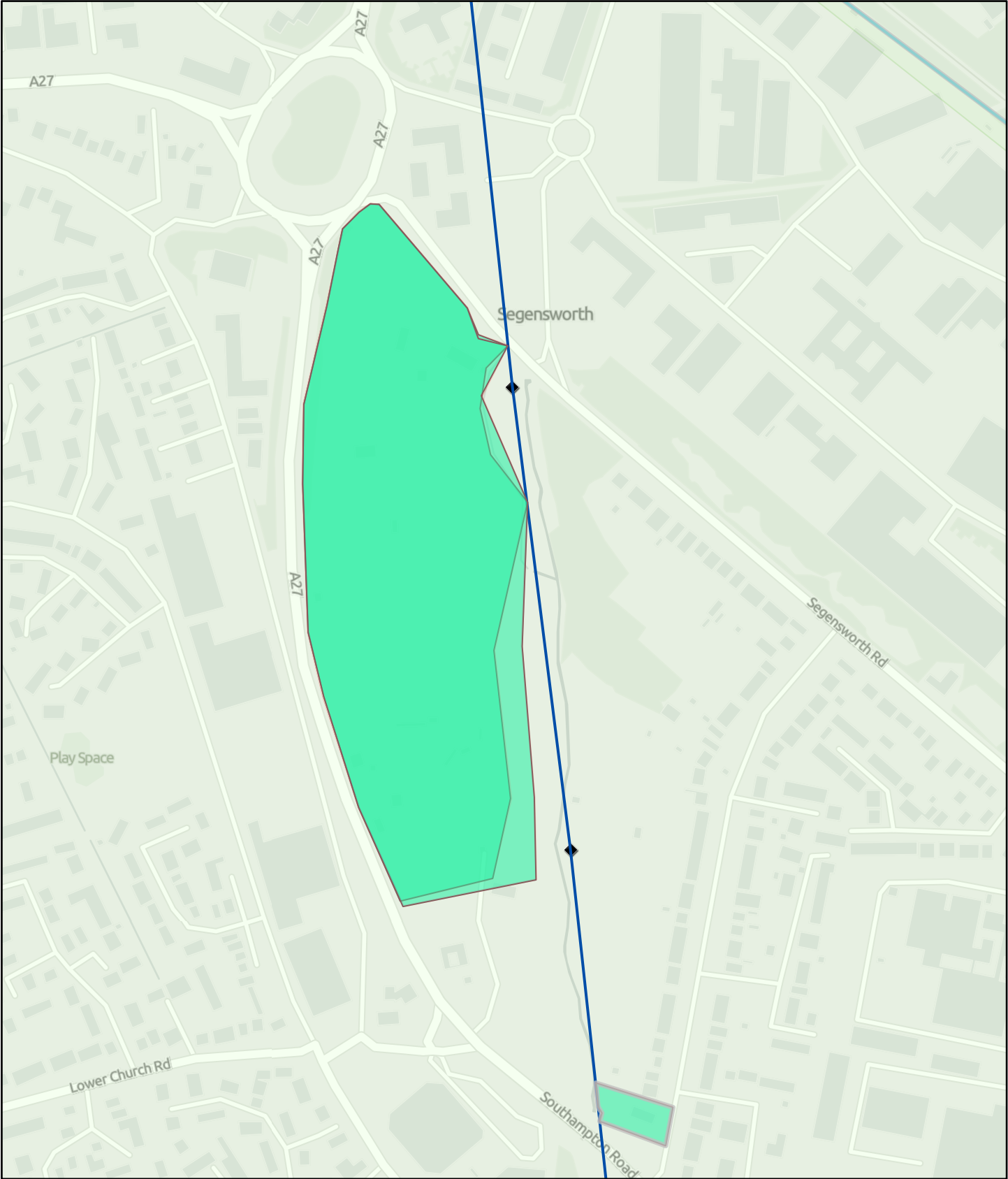
If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.co.uk

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

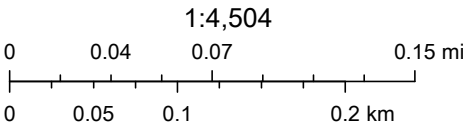
or visit the website: <https://www.beforeyoudig.cadentgas.co.uk/login.aspx>

041220 Fareham BC - Local Plan Reg 19 Consultation - Asset map HA3



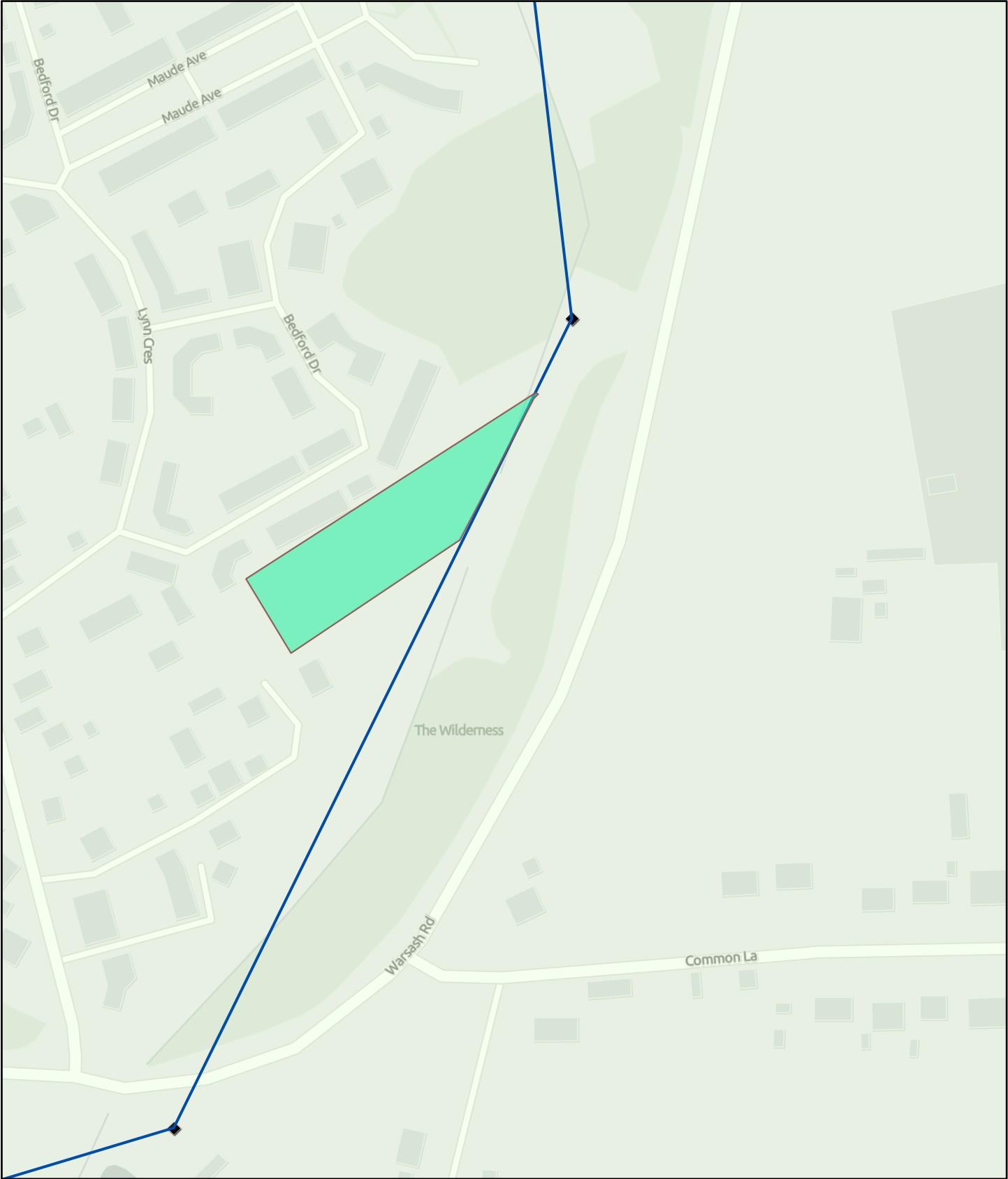
04/12/2020, 14:33:00

- Development_Plan_Monitoring_Sites_vw_9270
- Development_Plan_Monitoring_v2_7386
- Electric_Assets_4020
 - 400
 - Electric_Assets_1587
 - Development_Plan_Monitoring_v2_977_5701



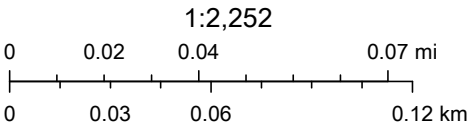
Contains OS data © Crown Copyright and database right 2020
Contains data from OS Zoomstack

041220 Fareham BC - Local Plan Reg 19 Consultation - Asset map HA19



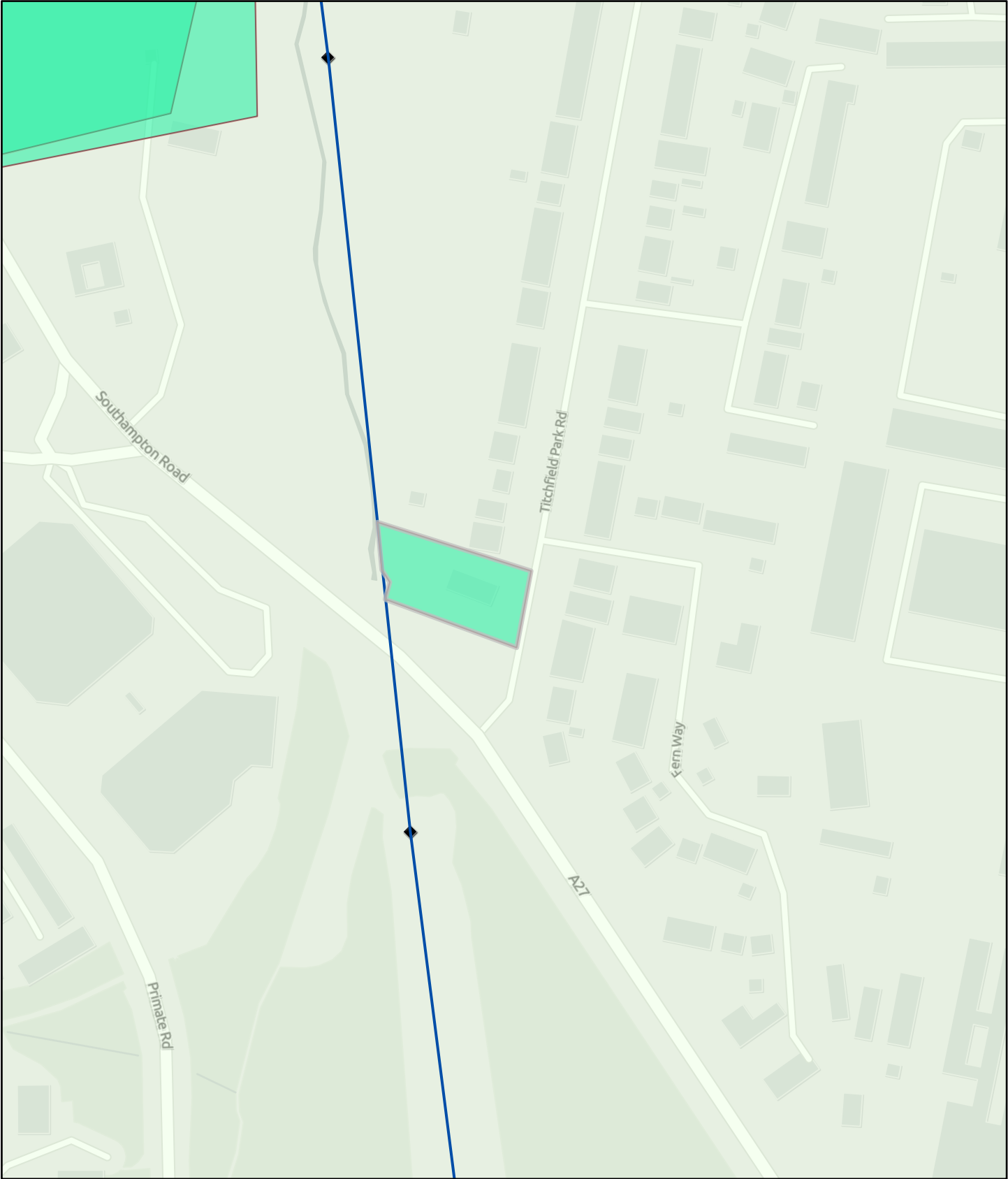
04/12/2020, 14:35:59

- Development_Plan_Monitoring_Sites_vw_9270
- Development_Plan_Monitoring_v2_7386
- Electric_Assets_4020
 - 400
 - Electric_Assets_1587
- Development_Plan_Monitoring_v2_977_5701



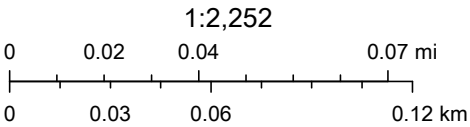
Contains OS data © Crown Copyright and database right 2020
Contains data from OS Zoomstack

041220 Fareham BC - Local Plan Reg 19 Consultation - Asset map HA38



04/12/2020, 14:34:36

- Development_Plan_Monitoring_Sites_vw_9270
- Development_Plan_Monitoring_v2_7386
- Electric_Assets_4020
- 400
- Electric_Assets_1587
- Development_Plan_Monitoring_v2_977_5701



Contains OS data © Crown Copyright and database right 2020
Contains data from OS Zoomstack

Keely, Lauren

From: Aziz, Rebecca <Rebecca.Aziz@naturalengland.org.uk>
Sent: 18 December 2020 12:04
To: Planning Policy
Subject: Natural England's consultation response
Attachments: 333521 NE response - Fareham Local Plan 2037 - Regulation 19 Consultation - Fareham Borough Council.pdf

Dear Planning Strategy Team,

RE: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Thank you for consulting Natural England on Fareham's Local Plan. We have also reviewed the local plan Habitats Regulations Assessment and Sustainability Appraisal. Please find our response attached.

If you have any queries please let me know.

Many thanks,

Becky

Becky Aziz

Sustainable Development Senior Advisor (Development Plans)

Thames Solent Area Team

Natural England



www.gov.uk/natural-england



During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay alert, control the virus, save lives.

This message has been sent using TLS 1.2

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: 18 December 2020
Our ref: 333521
Your ref: N/A



Planning Strategy Team
Fareham Borough Council

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Thank you for your consultation dated 06 November 2020 which was received by Natural England on the same date.

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.

Natural England welcomes the Council's approach to achieving sustainable development through its Local Plan, particularly through its suite of Natural Environment policies that include protection of internationally, nationally and locally designated sites, the enhancement of the local ecological network and the requirement for biodiversity net gain.

Our comments on the Regulation 19 Local Plan and supporting Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA) are made below.

Strategic Policy DS1: Development in the Countryside

It is recommended this Policy also requires proposals to ensure compliance with Natural Environment policies, in particular Strategic Policy NE1 and Policy NE2, to ensure impacts on nature conservation interests are properly considered and addressed, and biodiversity net gain is achieved (for applicable development).

With regards to soils, the local plan outlines that 'the benefits of protecting the Best and Most Versatile (BMV) agricultural land are considered against the need for development'. This Policy requires development proposals to demonstrate they 'Conserve and enhance landscapes, sites of biodiversity or geological value and soils'.

The National Planning Policy Framework sets out that:

'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework¹; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

1 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

It is recommended that this Policy is amended to give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long term capability of BMV agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.

Where site allocations are sited on BMV land, the Plan should outline a requirement for the protection of soils during construction where possible, referencing the '[Defra Code of practice for the sustainable use of soils on construction sites](#)'.

Strategic Policy DS3: Landscape

Natural England welcomes the proposed designation of eight Areas of Special Landscape Quality within the Borough, and the requirement for development in these areas to meet stringent criteria that seek to protect and enhance landscape.

Strategic Policy CC1: Climate Change

Natural England advise all Local Plans consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

Natural England welcomes Strategic Policy CC1: Climate Change that promotes mitigation and adaptation to climate change through various methods including the integration of green and blue infrastructure into the design of developments, adopting higher water efficiency standards, the integration of energy efficiency, renewable and low carbon technologies into all development, and reducing reliance on car travel.

Natural England supports the embedding of policy that will deliver measures to increase sustainability of development over the Plan period. This should also include reducing consumption of raw natural resources, sourcing more renewable or 'green' energy, and reducing waste. Consideration should be given to the collection of financial contributions from development to offset residual carbon emissions elsewhere in the Borough. Consideration can also be given to the retrofitting of existing development with technology that improves energy and water efficiency.

It is recommended that Local Plan policy also seeks measures that help natural habitats across the Borough adapt to the effects of climate change. We would encourage you to refer to the Natural England and RSPB [Climate Change Adaptation Manual](#) and look at the step by step approach to identifying the climate resilience of habitats that occur in the Borough. Consideration should be given to addressing issues on habitats and protected sites that will be exacerbated by climate change, such as flooding, drought, reduction of water resources etc.- the Manual can also help identify these.

Consideration can be given to delivering specific projects within the Borough. For example, to maximise climate change adaptation and mitigation through the establishment of a Nature Recovery Network (NRN), and the Local Nature Recovery Strategy in which the NRN would sit, to ensure climate change resilience at their core. Such projects could potentially benefit from carbon offsetting contributions from development over the local plan period.

Such an approach could link into other aspects of the Plan such as water and air quality, nutrient mitigation for Solent European designated sites, delivery of biodiversity net gain, natural flood management, and green infrastructure implementation among others. Natural England would be happy to advise further on this aspect.

Policy CC2: Managing Flood Risk and Sustainable Drainage Systems

Natural England welcome this Policy that requires development ensures flood and surface drainage are properly addressed, and that Sustainable Drainage Systems (SuDS) are designed in accordance with CIRIA C753 SuDs Manual, to be as 'natural' as possible.

It is advised that the policy makes clear that where a development drains to a protected site(s), an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection may be required to ensure water quality impacts are avoided.

Where SuDS are proposed serving as mitigation for protected sites, development should ensure that appropriate resources are put in place to ensure their long-term (in perpetuity) monitoring, maintenance/replacement, and funding.

Policy CC3: Coastal Change Management Areas (CCMAs)

Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. Sustainable coastal management needs to embrace long-term change and achieve positive outcomes for both.

Policy CC3 identifies that the North Solent Shoreline Management Plan (SMP) policy for the majority of Fareham Borough's coastline is 'Hold the Line', and identifies two CCMAs between Hook spit and Meon Shore, with an identified coastal management policy of 'No Active Intervention'. The Policy will ensure that development in these areas will appropriately consider coastal change. It also will ensure replacement coastal defence schemes 'are consistent with the relevant Shoreline Management Plan and that there will be no severe adverse impact on the environment, the English Coast Path, and the rights of way network'.

We would advise that the Local Plan should also help facilitate the relocation of valued environmental assets away from areas of risk.

Strategic Policy NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network

Natural England welcomes this policy that sets out clearly the hierarchy of nature conservation and the requirement for development to 'demonstrate clearly that the mitigation hierarchy has been followed' in terms of avoiding, mitigating or compensating (as a last resort) impacts on biodiversity. Natural England welcomes the Local Ecological Network (LEN) approach that has been included in the local plan.

It is helpful that the LEN and the Council's Green Infrastructure Strategy have been suggested as tools to provide opportunity for enhancements across the Borough. Please read our comments below in relation to Policy NE2 that regards the choosing of suitable opportunities for biodiversity enhancement.

Policy NE2: Biodiversity Net Gain

Natural England is fully supportive of the inclusion in the local plan of a Policy for biodiversity net gain. It is welcomed that the policy refers to the benefits to Borough residents from the ecosystem services that being close to nature provides, and outlines an expectation that offsite net gain must be sought as close to the development as possible. However in some instances this may be difficult, and Natural England recommends that consideration is given to developing a suite of projects across the LEN that development within the Borough can contribute to thereby ensuring the biodiversity within the Borough is protected and enhanced. For example, partners that manage Local Nature Reserves and Sites of Importance for Natural Conservation in the Borough could submit projects to the local planning authority to enhance the ecological value of these sites. These projects could be funded by development that requires offsite compensation or additional enhancements to achieve biodiversity net gain. This approach can also be used by development with limited opportunities for biodiversity net gain on-site.

The Policy outlines that the Council may prepare and adopt a Supplementary Planning Document (SPD) for Biodiversity Net Gain. Due to the need to ensure net gain is delivered in a suitably

strategic way, and having regard to the timescales of the legislative requirement for net gain and further national guidance, Natural England would support the development of such an SPD and would encourage Policy NE2 to outline this as a clear intention of the Council, in order to provide further guidance and support to aid sustainable development across the borough. Natural England will be happy to advise further to aid the development of such an SPD.

- *Calculating net gain*

Please note that Biodiversity Metric 3.0 is due to be published early 2021, which will supersede [Biodiversity Metric 2.0](#). We advise that the Policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain.

Please note that although the Policy includes 'nesting and roosting features' as suggestions for achieving net gain, it is our advice that features such as bird and bat boxes, swift bricks, bee hotels etc should be classed as general biodiversity enhancements that should be included as part of a wider biodiversity enhancement and mitigation plan. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric.

- *Wider environmental gains*

The reference to seeking wider environmental gains, for example to address water/air quality, flooding, climate change etc. is welcomed. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips, changing cutting regime of open spaces and road verges*) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats

*Please see this [paper](#) regarding cost-effective and low-maintenance management for species-rich grassland on road verges and the value it can contribute to biodiversity and ecosystem services.

Please note that Natural England and Defra are developing an Environmental Net Gain/metric for Natural Capital Net Gain that can be used in conjunction with the Biodiversity Metric (but not instead of). Further information will be available in 2021.

- *Monitoring of net gain*

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

Policy NE3: Recreational Disturbance on the Solent Special Protection Areas (SPAs)

Natural England welcome this policy that will require new residential development to address in-combination effects on the Solent SPAs via recreational disturbance. It is recommended the Policy also outlines that other types of development (such as new hotels, student accommodation, care homes etc.) may also need to address recreational disturbance impacts, both alone and in-combination. Such development should be assessed on a case by case basis.

Policy NE4: Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent

Natural England welcome this policy that will require new development that propose a net increase in overnight accommodation to address in-combination effects on the Solent designated sites via eutrophication from nutrients in wastewater.

Policy NE5: Solent Wader and Brent Goose Sites

Natural England welcome this policy that will require development to address effects on sites identified by the Solent Wader and Brent Goose Strategy (SWBGS) which serve as functionally linked land to the Solent SPAs.

It is recommended that the following wording within the Policy “*Sites which are used by Solent Waders and/or Brent Geese (as shown on the Policies map)*” is amended to read “*Sites which are used by Solent Waders and/or Brent Geese (as identified within the most up to date version of the Solent Wader and Brent Goose Strategy)*” to take account of any changes to sites and their distribution across the Borough, as these updates can be implemented at irregular times. Any further references to the Policies map should be similarly amended to refer to the SWBGS mapping.

Core Areas – due to their essential function within the SWBG network, it is advised these sites are identified for protection by the Policy. Any development that would result in impacts to a Core Area will need to be carefully assessed on a case-by-case basis. There are limited options where the function of a Core site can be fully replicated elsewhere in terms of its suitability and appropriate locality; where such land is available, an assessment of replicability will need to be undertaken through discussions with Natural England and the Local Planning Authority.

Financial contributions – it is welcomed that the Policy outlines that financial contributions proposed as mitigation will be used for the management and enhancement of an ‘agreed suitable identified site for Solent Waders and Brent Geese’. Such proposals should demonstrate how such funds will be used to enhance, manage and monitor sites within the wider Solent Waders and Brent Geese network, in perpetuity. It is suggested that the Council works with relevant partners/stakeholders, including cross-boundary partnerships, to develop a strategic project(s), such as a bird reserve, and/or list of projects to enhance, manage and monitor the wider Solent wader and brent goose ecological network, to which contributions can be directed.

Policy NE6: Trees, Woodland and Hedgerows

Natural England welcomes this Policy that seeks to protect and enhance trees, woodland and hedgerows within the Borough. It is recommended that this Policy requires development proposals that affect ancient woodland, ancient trees and veteran trees, to ensure they are in line with [standing advice](#) published by Natural England and the Forestry Commission.

Policy NE8: Air Quality

It is welcomed that the Policy recognises that ‘poor levels of air quality can also lead to environmental issues’. The Policy includes a need for planning applications to consider if they will have a ‘potential adverse effect on biodiversity, especially where it would affect sites designated for their biodiversity value’.

The Policy outlines that the Local Plan HRA concludes the Plan ‘would not have a likely significant effect on the internationally important habitats and species present in the area’. As this issue has

been considered within the HRA appropriate assessment, the wording here should be amended to use the correct terminology under the Habitats Regulations, i.e. the HRA concludes the Plan will not result in an 'adverse effect on integrity' (the term 'likely significant effect' is used at the screening stage of the HRA). See further comments on air quality below in regards to the Local Plan HRA.

Policy NE9: Green Infrastructure

Natural England welcomes this Policy that seeks to fully integrate green infrastructure (GI) into development and maximise opportunities to connect to the wider environment. The provision of enhanced green infrastructure and sites of nature conservation value can not only help address some of the mental and physical health problems that are experienced in the Borough's population, but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation.

Policy NE10: Protection and Provision of Open Space

This Policy references protection of public rights of way. Natural England advises that the Policy should also seek to secure enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. It is welcomed the plan seeks new access opportunities; it should seek to link existing rights of way where possible. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.

It is welcomed that the Policy makes provision for appropriate quantity and quality of green space to meet identified local needs (as outlined in paragraph 96 of the NPPF) based on Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) in assessing the level of accessible natural greenspace; it is also welcomed that it recognises development may be required to 'provide more open space above what is required by the standards to make the development more acceptable'.

Policy D1: High Quality Design and Place Making

Natural England welcomes this Policy that requires the design of developments to integrate existing and new habitats and biodiversity within a coherent and well managed, connected structure. It is advised that landscaping of developments and open spaces seeks to use appropriate native and locally sourced species as far as possible to cater for local wildlife.

Policy D4: Water Quality and Resources

Natural England welcome this policy that seeks to conserve water and improve its quality.

Southern Water's Water Resources Management Plan (WRMP) 2019, that covers the planning period 2020-2070, projects a significant supply demand deficit during periods of drought in the Western Area, and commits to implementing a long term water resources scheme to restore the supply demand balance whilst avoiding and/or mitigating impacts on European sites, including the River Itchen SAC.

It is Natural England's advice that in advance of any permitting of such a suitable long term scheme, uncertainty remains with regards to water resources and the impacts of abstraction on protected sites.

Although it is welcomed that Policy D4 requires a water consumption for new dwellings of no more than 110 litres per person per day, Natural England strongly recommend all new development within the Southern Water supply area adopt a higher standard of water efficiency of 100 litres/per person/day, including external water use and re-use, in line with Southern Water's Target 100 demand reduction programme which is committed to within their WRMP19. Natural England also recommends that the Policy encourages the wise use of water in conjunction with the water companies, for example by developments incorporating grey water recycling systems and efficient appliances

Please see Natural England advice above in relation to Policies NE4 and Policy CC2 with regards to nutrients and surface water treatment via SuDS.

Neighbourhood Plans

Currently there are no Neighbourhood Plans in the Borough, but the Local Plan provides a 'strategic evidence base' which will inform any future Neighbourhood Plans.

It is recommended that any future Neighbourhood Plans which allocate housing should also identify spaces for environmental enhancement, for the purpose of offsetting environmental impacts, e.g. through the designation of Local Green Spaces. Such a local approach could give communities more ownership over such green spaces and provide a more strategic route to addressing common environmental impacts from development in that area, such as air and water pollution, habitat and species loss and increased carbon emissions, and could deliver biodiversity net gain and nutrient offsetting.

Such spaces could include the development of community orchards and play areas, woodlands and nature reserves, and serve a variety of functions that benefit both nature and the local community, for example providing benefits to health and wellbeing, offsetting nutrient discharges from allocated development and providing further scope for carbon sequestration.

Specific comments on Housing Allocation Policies

- HA9 - Heath Road (70 dwellings)

It is acknowledged this allocation site has resolution to grant permission for 70 dwellings. It is recommended this Policy includes the requirement to secure an appropriate level of offsite compensation to address the loss of secondary woodland on site which may in parts qualify as lowland mixed deciduous woodland habitat.

- HA29 - Land East of Church Road (20 dwellings)

Much of this site shows as Lowland Mixed Deciduous Woodland priority habitat on the Ecological Network mapping for Hampshire. Part of the site is designated as a Site of Importance for Nature Conservation (SINC) according to the Policy map. The Policy outlines a requirement for ecological mitigation for the site-specific construction and operational impacts of a development proposal. It is advised the Policy outlines a requirement to secure an appropriate level of offsite compensation to address any loss of priority habitat on site to ensure compliance with Policy NE1.

- HA31 - Hammond Industrial Estate (64 bed care home)

The Policy should ensure the impact of nutrients in wastewater is addressed to ensure compliance with Policy NE4.

- HA37 - Former Locks Heath Filling Station (30 dwellings)

This site is adjacent to an area of Lowland Mixed Deciduous Woodland priority habitat as shown on the Ecological Network mapping. The Policy should ensure that impacts on priority habitats and protected species are taken into account and appropriately addressed.

- HA38 – 68 Titchfield Park Road (9 dwellings)

The site is adjacent to Sylvan Glade SINC, much of which is ancient semi-natural woodland. The Policy should ensure compliance with standing advice on ancient woodland, ancient trees and veteran trees and that impacts on the SINC and protected species are appropriately addressed.

- HA42 - Land South of Cams Alders (60 sheltered housing)

This allocation site is located on 'Fort Fareham Grassland' SINC that supports woodland and meadow communities. It also lies adjacent to Fort Fareham SINC known for supporting wet woodland communities.

As previously advised in our response to the Supplement to the Reg 18 Local Plan (letter dated 23rd April 2020), allocations and development proposals should ensure they engage the mitigation

hierarchy, where impacts on designated ecological sites/features should first be avoided, and where not possible, adequately mitigated. Where this is not possible, any loss of priority habitat should be appropriately compensated. All residual ecological impacts will need to be addressed before any net gain for biodiversity can be achieved.

Natural England recommends that where loss of SINC habitat cannot be avoided, the policy should make clear how requirements set out within the NPPF, NERC Act 2006 and Local Plan Natural Environment policies will be met. It is advised an appropriate level of offsite compensation should be required to address any loss of priority habitat on site to ensure compliance with Policy NE1.

- E4: Solent 2 (Employment - 23,500 sq. metres)

This employment allocation is located on Whiteley Meadow - Plot 2184 SINC and Ashley Wood, Fareham SINC. The Hampshire Ecological Network Mapping dataset shows much of this area as Lowland Mixed Deciduous Woodland, a priority habitat listed as required under Section 41 of the Natural Environment and Rural Communities Act 2006. The site is also situated adjacent to the Gull Coppice (South-West Remnant) SINC which comprises ancient semi-natural woodland.

It is acknowledged that this site is an existing allocation within the adopted Fareham Local Plan Part 2 (2015). The current Policy outlines a requirement for this development to protect existing woodland and avoid habitat severance, and appropriate mitigation and compensation for any loss of protected trees. However, it is our view that a significant area of habitat, including mature woodland, is likely to be lost as a result of development. The Policy should ensure that it is compliant with Strategic Policy NE1 with regards to impacts on the local ecological network in this locality. In line with existing national and local policy and legislation, it is Natural England's advice that the mitigation hierarchy of avoid, mitigate and lastly compensate is employed where considering impacts on these habitats, particularly those designated as SINC. Measures should be sought to protect and enhance the local ecological network. Where impacts cannot be avoided or adequately mitigated, a comprehensive compensation package should be required that addresses the loss of all priority habitat on site (rather than just specifying protected trees), that seeks to enhance and connect habitat in the locality.

Comments on the HRA

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the Local Plan in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

We have the following comments on the HRA:

- *Recreational disturbance – New Forest designated sites*

The Local Plan HRA screening assessment outlines that although the Borough falls within the 25km buffer of the New Forest designated sites (via a straight line), the minimum actual travel distance by car is of approximately 30km travel distance (via the M27). In comparison to the number of visits from residents closer to the New Forest, the assessment states 'visits to the New Forest SAC/SPA/Ramsar associated with increased housing development in Fareham Borough contribute a significantly lower proportion of overall visits to the designated sites and it is not considered likely that significant effects associated with recreational disturbance from Fareham housing development would arise'. The HRA screens this impact pathway out from an appropriate assessment on this basis.

It is understood Footprint Ecology are currently conducting further analysis on several aspects of their latest visitor surveys. This analysis will assist the definition of a robust catchment area for recreational impacts. It will help in the preparation of a strategic, cross-boundary approach with neighbouring competent authorities to deliver habitat mitigation for the New Forest SPA/SAC/Ramsar. This work is due to be completed shortly and will provide a useful update to the evidence base against which such impacts from new development from surrounding local authority areas can be assessed.

Therefore, whilst acknowledging that the level of additional impacts from new residents is known to significantly decrease with distance from the New Forest designated sites, Natural England consider at this time there remains some uncertainty with regard to the evidence confirming the level of additional impacts from new residents of Fareham local plan development. We therefore advise this issue is taken forward to the appropriate assessment stage where further work may be carried out to ascertain the level of impacts as accurately as possible.

Where impacts are identified, suitable and proportionate mitigation should be proposed; we recommend the Council works with the New Forest National Park Authority and the other partner authorities to develop a strategic approach to addressing recreational impacts from new development on the New Forest designated sites. Such an approach should include developer contributions towards the New Forest National Park Authority's Habitat Mitigation Scheme to enable the authority to deliver site specific mitigation measures on behalf of applicants.

Natural England will be happy to provide further advice to the Council on this aspect as the evidence base develops.

- *Air quality*

The Local Plan is supported by an Air Quality Habitats Regulations Assessment (Ricardo, Sept 2020). The conclusions drawn in the Local Plan HRA in regards to air quality impacts are based on those drawn within the Ricardo report. Natural England concurs with the conclusions drawn in the report.

The Ricardo report suggests that the Council regularly reviews the Defra airborne NOx forecast levels. This is welcomed as a way to ensure any changes in forecasting and potential consequential changes to conclusions drawn in the report for this pollutant can be appropriately reviewed and addressed during the local plan period.

- *Water quality – nutrients*

The HRA calculates a nitrogen budget for the local plan of 2536.99 kgTN/yr. Appendix III of the HRA outlines various mitigation schemes that can be utilised or progressed as a means to ensure nutrient neutrality can be delivered by new development.

The HRA states within its Summary of Findings that the sites Chichester and Langstone Harbours SPA/Ramsar, Portsmouth Harbour SPA/Ramsar and Solent and Dorset Coast SPA are screened out of an appropriate assessment in relation to water pollution impacts. Much of development within Fareham borough is served by Peel Common wastewater treatment works (WwTW), which is a coastal WwTW that discharges effluent several kilometres out into the Solent. It is our advice that long-shore outfall pipes are likely to have shifted and widened the distribution of nitrogen loading within the effluent across the Solent SAC and SPAs. It is important to recognise the loading from Peel Common WwTW contributes to a number of estuaries and catchments within the Solent (including Portsmouth Harbour, Langstone Harbour, Chichester Harbour, River Meon, Wootton Creek and the Medina Estuary catchments). It is therefore Natural England's view that, because of this wide distribution of nitrogen loading, all designated sites should be screened in.

- *Other comments on the HRA*

Section 7.7.3 – this paragraph refers to the 'SAC' although it is relating to Portsmouth Harbour SPA and Ramsar.

Comments on the SA

We are broadly satisfied that the objectives and indicators within the Sustainability Appraisal cover our key interests, and welcome the identification of the need to conserve and enhance biodiversity, landscape character, and to reduce pollution. We also welcome the need to address minimise the

effects of climate change, and to minimise impacts on best and most versatile agricultural land. Please see some more specific comments below.

- SA5: To Minimise Carbon Emissions and Promote Adaptation to Climate Change

This SA objective to address the effects of climate change is welcomed. It is suggested a further monitoring parameter(s) is included to monitor the implementation of new GI/habitat that can seek to alleviate the pressures of climate change on species and the ecological network whilst also providing other benefits as described further in our advice above; e.g. percentage of new GI/ extent of priority habitat within the ecological network.

- SA7: To Conserve and Enhance Biodiversity

We advise that this SA objective also seeks to conserve and enhance geodiversity within the Borough, in line with national planning policy.

The SA outlines the Plan 'is predicted to lead to negative impacts to ecological receptors in the short to medium term, but many of these impacts are capable of being mitigated. Long-term effects are likely to be both positive and negative, and highly site-specific'. It is acknowledged these effects can be avoided/mitigated by the implementation of several policies including NE1, NE3, NE4 and NE5. It is advised Local Plan Policy requires relevant development to carry out site-level Habitats Regulations Assessments in order to ensure impacts on European sites are suitably addressed.

It is also suggested that further monitoring parameters are incorporated to ensure impacts on internationally, nationally and locally designated sites are monitored throughout the Plan period, e.g. via the number, extent and condition of sites designated for nature conservation. We would advise the use of a green infrastructure standard as an indicator, such as Natural England's Accessible Natural Greenspace Standard (ANGSt). Parameters for measuring the implementation of net gain should be introduced, see further above for our advice on net gain monitoring.

We would be very happy to comment further as the plan process progresses. If you have any queries relating to the detail in this letter please contact me on 07787005505.

Yours faithfully

Rebecca Aziz
Sustainable Development Senior Advisor
Thames Solent Area Team

Respondent details:

Title:	Mr
First Name:	Christopher
Last Name:	Nixon
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

1) Policy: H1 - Housing Provision

Legally compliant	No
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers above

As HMG is currently in the process of modifying the way that housing requirement is assessed and currently there is no knowledge of exactly how it will affect the number of dwellings required in Fareham, the numbers used in the policy are pure guesswork and, from what is being leaked at the moment, will almost certainly be incorrect. As such this document is premature and it makes no sense whatever to pursue this matter until the new central government system has been released. See <https://commonslibrary.parliament.uk/research-briefings/cbp-8981/>

What modification(s) is necessary to make the Local Plan legally compliant or sound?

Await the reforms to the National Planning Policy before finalising.

How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would then definitely comply with the required regulations and we would possibly then NOT be planning for a number of dwellings in excess of those required.

Your suggested revised wording of any policy or text:

No idea

If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

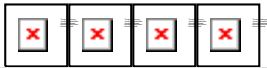
No, I don't want to take part in a hearing session

Keely, Lauren

From: Consultation
Sent: 21 December 2020 08:58
To: Planning Policy
Subject: Bargate Homes- Land at Warsash (On behalf of Pegasus)
Attachments: Fareham LP 2037 Reps_Bargate_Warsash_Dec 2020 Final.pdf; Fareham LP 2037 Reps_Bargate_Warsash_FLPR-LP.01_P1.pdf

Importance: High

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Gould <[REDACTED]>
Sent: 18 December 2020 17:07
To: Consultation <Consultation@fareham.gov.uk>
Cc: Trevor Moody [REDACTED]
Subject: Fareham Local Plan 2037 - Representations on behalf of Bargate Homes - Land at Warsash
Importance: High

Dear Sir/Madam

I refer to the above matter and attach representations and one associated appendix prepared by Pegasus Group on behalf of Bargate Homes in relation to their three land interests in Warsash: 1. Land South of Greenaway Lane (adjacent to 125 Greenaway Lane); 2. Land East of Brook Lane and West of Lockwood Road; and 3. Land East of Brook Lane and North of Warsash Road.

I look forward to receiving receipt of these representations in due course.

If you require anything else please do not hesitate to contact me.

Kind regards

CarolineGould
Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

3 West Links | Tollgate | Chandlers Ford | Eastleigh|Hampshire|SO53 3TG

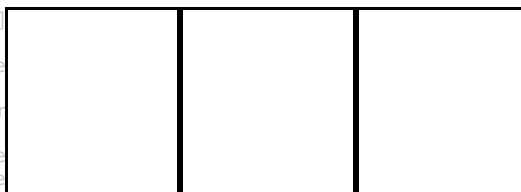


Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



www.pegasusgroup.co.uk

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.
This email and any associated files, is intended for the exclusive use of the addressee only.
If you are not the intended recipient you should not use the contents nor disclose them to any other person.
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



☐ Please consider the environment before printing this email message.

*****IMPORTANT INFORMATION REGARDING PEGASUS GROUP & CORONAVIRUS / COVID-19*****

After the extraordinary events of 2020, may we wish you a peaceful Christmas and a Happy New Year.
Our company will take a break over the festive period so Pegasus Group will close from 5.30pm on **Wednesday 23rd December 2020** and reopen at 9am on **Monday 4th January 2021**



FAREHAM LOCAL PLAN 2037 REPRESENTATIONS

POLICY HA1 HOUSING ALLOCATION – LAND NORTH AND SOUTH OF GREENAWAY LANE, WARSASH

**ON BEHALF OF
BARGATE HOMES**



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0 Introduction 1

2.0 Plan Overall 3

3.0 Specific Proposed Changes 13

4.0 Participation at the Examination Hearing Sessions 32

APPENDICES:

Appendix 1 - Site Location Plan (Drawing No. FLPR-LP.01 – Rev P1)

1.0 Introduction

- 1.1 The following representations are prepared by Pegasus Group on behalf of our client, Bargate Homes. Our client has interests in three parcels of land that all form part of the proposed Policy HA1 housing allocation – Land North and South of Greenaway Lane, Warsash, identified within the emerging Fareham Local Plan 2037 (hereafter referred to as the Publication Local Plan).
- 1.2 The three land interests are as follows: 1. Land South of Greenaway Lane (adjacent to 125 Greenaway Lane); 2. Land East of Brook Lane and West of Lockwood Road (our client controls all but the easternmost part of this site); and 3. Land East of Brook Lane and North of Warsash Road. A Site Location Plan (Drawing No. FLPR-LP.01 – Rev P1) is attached at Appendix 1.
- 1.3 At the time of writing these representations, all three sites are subject to outline planning applications, which have all been considered by Fareham Borough Council's (FBC) Planning Committee. Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) has a resolution to grant outline planning permission for the construction of up to 100 dwellings (Ref. No. P/19/0402/OA). Land East of Brook Lane and West of Lockwood Road has a resolution to grant outline planning permission for the construction of up to 157 dwellings (Ref. No. P/17/0998/OA). Land East of Brook Lane and North of Warsash Road has a resolution to grant outline planning permission for up to 140 dwellings (Ref. No. P/17/0752/OA).
- 1.4 For the reasons set out in these representations, our client strongly supports the allocation of their three land interests as part of Policy HA1. However, their view is that amendments are required to the specific wording of this policy. These representations also set out our client's position in relation to required amendments to some of the more general policies proposed within the Publication Local Plan (PLP).
- 1.5 Our client is an important stakeholder within Fareham and is keen to work with the Council to produce a plan which is legally compliant and meets the tests of soundness set out within the National Planning Policy Framework (NPPF). Currently the plan is neither legally compliant nor sound.

- 1.6 The following representations utilise the same format as the Council's response form. Each area of the PLP which is deemed to be either not legally compliant or unsound is clearly outlined below. Proposed changes to the plan in relation to policies, supporting text and the proposals map are provided.

	Agent	Client
Title	Mr	Bargate Homes c/o
First Name	Jeremy	Agent
Last Name	Gardiner	
Job Title	Senior Director	
Organisation	Pegasus Group	
Address	3 West Links Tollgate Chandlers Ford Eastleigh Hampshire	
Postcode	SO53 3TG	
Telephone	07929 788776	
Email	jeremy.gardiner@pegasusgroup.co.uk	

2.0 Plan Overall

B1 Which part of the Local Plan is this representation about?

2.1 The following comments relate to the overall Local Plan.

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan:

2.2 Paragraphs 1.5–1.6, 1.14, 1.17, 1.37, 2.12, 3.19–3.22, 3.49–3.57, 4.1–4.20, Appendix B.

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan

2.3 Policies H1, HA1, HP1, HP4, HP5, HP6, HP7, HP9, DS1, DS3, NE8, D1.

B1c Which part of the Policies Map

2.4 Policy HA1 allocation site – Land North and South of Greenaway Lane, Warsash.

B2 Do you think the Publication Local Plan is:

Legally compliant – No

Sound – No

Complies with the duty to co-operate – No

2.5 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

B3.1 The Publication Local Plan is not Legally Compliant

2.6 The Publication Local Plan (PLP) has based its housing proposals on the annual housing target derived from the Government's draft Revised Standard

Methodology published in August 2020 in its consultation "Planning for the Future". The Government's response to this consultation was published on 16th December 2020. The Government does not propose to proceed with the changes to assessing local housing need consulted on earlier this year in "Changes to the Current Planning System"; but instead has published a revised approach to the Standard Method, which retains the method in its previous and current form except for London and 19 of the most populated cities and urban centres.

- 2.7 The key change is to apply a 35% uplift to the Standard Method for Greater London and the 19 most populated cities and urban areas in England – Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke on Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton and Brighton and Hove. The minimum housing requirement for Fareham calculated using the amended standard method therefore remains 514hpa.
- 2.8 The Government's White Paper, "Changes to the Current Planning System" (published in August 2020 alongside the "Planning for the Future" consultation) provided guidance to local planning authorities which were at or close to the Regulation 19 stage of plan-making at paragraph 43:

"Transition

43. The Government is aware that any change in the standard method will have an impact for plans that are currently under development, as authorities expend considerable resources in developing new plans. To enable an orderly transition to the revised standard method, and achieve as much short-term supply as possible while setting the right expectations for early stage plan-making, we propose that from the publication date of the revised guidance, authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination. Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning

Inspectorate. This is to strike a balance between allowing an appropriate transition period for plans that are nearly through the process, but without causing a significant delay in planning for a higher level of need."

- 2.9 This transitional arrangement applies to Fareham at the time, such that the previous Standard Method (514 hpa) continued to apply for plan-making purposes in the borough in any event, but the Council chose not to follow this national guidance.
- 2.10 The National Planning Policy Framework (NPPF) states (paragraph 16 a)) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". Footnote 10 confirms that this is a legal requirement of local planning authorities in exercising their plan-making functions. Meeting the objectives of sustainable development includes "...meeting the needs of the present...". By preparing a Plan based on the revised draft Standard Methodology target of 403 dwellings per annum, the local planning authority is failing to meet its local objectively assessed need for housing, thereby failing to plan to deliver sustainable development.
- 2.11 The PPG (ID 2a-003-20190220) is clear that the standard method should be used and any other method should only be used in exceptional circumstances. It further explains that:
- "...Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."* (PPG ID 2a-015-20190220).
- 2.12 As discussed above the extant standard method identifies a requirement of 514hpa. The NPPF (paragraph 60) identifies that the current standard method provides a minimum requirement. To depart and provide a figure lower than the current Standard Method requires exceptional circumstances and must be justified by clear and robust evidence. This is absent from the Council's evidence base and as such is an unsound approach.

- 2.13 The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa) – a requirement confirmed by the Government's announcement of 16th December 2020. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa was procedurally flawed, lacking in evidential basis, premature and misleading.
- 2.14 The NPPF (paragraph 33) also states that plans should be reviewed every 5 years and updated as necessary. The Inspector's Report on the Examination into the Fareham Local Plan Part 2 (dated 12th May 2015) included modifications which were all proposed by the Council. Its first Main Modification was "a commitment to an early review of the local plan (ie. LP1, LP2 and LP3)". This included a timetable for the local plan review between 2016 and 2018 which the Council has failed to adhere to, having previously expressed its commitment to the Inspector.
- 2.15 The Local Plan Part 3 is the Welborne Plan which was adopted in 2015. The total quantum of housing to be delivered at Welborne has reduced over the years, and the date for its commencement has repeatedly slipped back. The development is currently running about 5 years late. Recently, serious doubts have been expressed over whether it is deliverable at all given the reported funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10. The development is certainly not currently "deliverable" in NPPF terms. Nonetheless, the PLP relies heavily on the delivery of homes at Welborne as by far the most important source of its housing supply - 4,020 homes (just over 48%) out of a total suggested supply of 8,389 homes are timetabled to be completed at Welborne by 2037, and completions are included in the Council's trajectory for the first five years of the plan. Given the heavy reliance placed on a development which, at best, appears to be at serious risk of continuing to be significantly delayed, the Welborne Plan should be reviewed as a matter of urgency.
- 2.16 Given the importance of the Welborne Plan to housing delivery this is considered an issue of both soundness and legal non-compliance.

B3.2 The Publication Local Plan is not Sound

2.17 Paragraphs 1.5 – 1.6 of the PLP set out the "Tests of Soundness" which require that the Plan has been "positively prepared, justified, effective and consistent with national policy". The PLP fails to meet the Tests of Soundness for the following reasons:

1. It has not been "positively prepared"

2.18 The Plan does not seek to, as a minimum, meet the area's objectively assessed need. Given that the Core Strategy was adopted on 4th August 2011, it is significantly out of date such that (as advised by paragraph 73 and footnote 32 of the NPPF) local housing need should be calculated using the current Standard Methodology. On this basis the local housing need target is 514 homes per annum (hpa) plus the appropriate buffer (5% or 20%). Instead, the PLP plans for 403 hpa, thereby failing to plan for the area's objectively assessed need, and failing to contribute to the achievement of sustainable development.

2.19 The lower housing requirement has also not been the subject of sustainability appraisal (SA). Whilst the SA re-assesses sites based upon a lower housing requirement it fails to consider the implications of a lower housing requirement, compared to the current standard method, upon the delivery of the SA objectives. Even if the lower requirement were justified by national policy, which it is not, the retention of the housing requirement at the level previously consulted upon would be a reasonable alternative.

2.20 The Council published an Affordable Housing Strategy in 2019. On page 14 of the Affordable Housing Strategy, it is suggested that there is a need for 3,500 affordable homes to 2036, or circa 220 per annum. This is based on the existing need for 3,000 affordable homes and an allowance of 500 homes to provide for new households and those falling into need. Given that an average of only 76 affordable homes have been built per annum in Fareham Borough since 2011, there is a significant need to boost the supply of additional affordable housing to address needs. Indeed, the delivery of affordable housing needs to almost treble. The provision of affordable housing to address this need is a

significant matter.

- 2.21 It is also unclear whether the PLP has planned to adequately accommodate unmet need from other authorities. The PPG (ID 2a-010-20190220) identifies that meeting unmet needs from neighbouring authorities as set out in a Statement of Common Ground is one reason why local housing need calculated using the current standard should be exceeded. Contrary to the advice within the PPG (ID 2a-010-20190220) there are currently no Statements of Common Ground identifying if the figure of 847 dwellings is adequate or accepted by other authorities. Rather the Council speculates that this contribution would be “ratified” by a subsequent Partnership for South Hampshire Statement of Common Ground (Duty to Co-operate Statement of Compliance, paragraph 4.5). There is, however, no evidence to support this speculation. Indeed, the only evidence presented confirms a request for Fareham to accommodate 1,000 dwellings from a single neighbouring authority. The PLP has been prepared in advance of the publication of Statements of Common Ground – as such its preparation is premature.
- 2.22 At paragraph 4.4 of the PLP it is stated that unmet need in the sub-region over the plan period could be “circa 10,750 dwellings”. At paragraph 4.5, Fareham’s “immediate neighbours” are considered, and it is confirmed that Portsmouth City Council has requested that Fareham contributes 1,000 dwellings towards its unmet need, and that Gosport is “likely to have an unmet need issue, currently estimated to be in the region of 2,500 dwellings...”. The Council’s ‘Duty to Co-operate Statement of Compliance’ identifies at paragraph 4.6 that instead of responding to the request from Portsmouth the Council is proposing to: “...take the approach that the issue of unmet need is not dealt with as specific to any authority, but as a general contribution.” It is not clear how this “general contribution” has been calculated but it appears inadequate. Gosport Borough lies between Portsmouth and Fareham. It is clear that Portsmouth cannot accommodate any of Gosport’s unmet need so the obvious place to accommodate it is in Fareham Borough. Therefore, if Fareham plans to deliver the unmet needs of Portsmouth and Gosport, its contribution would be 3,500 homes. However, the PLP (Table 4.1) proposes a contribution of just 847 dwellings to wider unmet need. This figure should be reviewed.

2.23 In relation to unmet need, it should also be remembered that Welborne (previously known as the North of Fareham SDA) was originally conceived by PUSH (now PfSH) as one of two SDAs which were promoted to meet the sub-regional needs of south Hampshire and brought forward in the "South East Plan". The Inspector's Report on the Examination into the Fareham LDF Core Strategy (dated 20th July 2011) identified five Main Issues, Main Issue 1 being:

"7. The North of Fareham SDA represents the most significant and controversial element of the Core Strategy.While the principle of the SDA's development is contained in the regional strategy – policy SH2 of the South East Plan (SEP) – the justification for the proposal derives from evidence prepared by South Hampshire local authorities (the Partnership for Urban South Hampshire [PUSH]) during the SEP's preparation....The advantages of SDAs are seen as threefold: safeguarding existing towns and villages by reducing coalescence; providing more opportunities for planning gain; and achieving a critical mass to deliver sustainability benefits. The development now proposed is one of two SDAs proposed by PUSH and brought forward into the SEP. Both are aimed at meeting sub-regional housing needs and, as such, their housing totals are separated from the housing requirement for the remainder of the Boroughs concerned in the sub-regional strategy and SEP."
(our underlining)

2.24 However, the Council is now treating Welborne as a source of housing supply for Fareham Borough only, disregarding its planned sub-regional role. This compounds the lack of positive preparation of the PLP and starkly contrasts the Council's current approach to the delivery of housing to meet sub-regional needs with its approach of a decade ago.

2. It is not "justified":

2.25 The PLP's strategy for housing delivery is not appropriate, because it is based on a need figure derived from the draft revised Standard Methodology which was still the subject of public consultation at the time that the Plan was prepared. The Government's response to the consultation is awaited. The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's

case, 514 hpa). As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa is procedurally flawed, lacking in evidential basis, premature and potentially misleading.

3. It is not "effective":

- 2.26 Fareham has decided to deliberately plan to not meet its local objectively assessed housing need, so fundamentally the plan will not be effective. This, coupled with its apparent failure to plan to contribute appropriately to the unmet housing need of the sub-region, indicates a failure to work effectively with its neighbouring authorities on cross-boundary strategic planning for housing delivery and a failure "to support the Government's objective of significantly boosting the supply of homes" (NPPF, paragraph 59). Rather, the PLP proposes to restrict the supply of homes in the plan period in a way which will exacerbate the local housing crisis.

4. It is not "consistent with national policy":

- 2.27 The PLP is not consistent with the NPPF because:
- It will not contribute to the achievement of sustainable development by not, as a minimum, planning to meet its local objectively assessed housing need;
 - It is not planning to adequately meet the unmet housing needs of neighbouring authorities in the sub-region;
 - It has not based its housing proposals on the current Standard Methodology;
 - Its strategy lacks a robust evidential justification; and
 - Its proposed housing land supply includes a majority of housing from sites which are not "deliverable" as defined by the NPPF.

B3.3 The Publication Local Plan does not Comply with the Duty to Co-operate

- 2.28 As stated at B3.1 above, it is unclear whether the PLP has planned to

adequately accommodate unmet need from other authorities.

- 2.29 Against a sub-regional unmet need figure of "circa 10,750 dwellings", and in the context of both neighbouring authorities of Portsmouth City Council and Gosport Borough Council having "unmet need issue(s)", and Havant Borough Council being expressly unable to accommodate any unmet need, the PLP (Table 4.1) proposes a contribution of 847 dwellings to wider unmet need. It is not clear how this has been calculated and it appears inadequate.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

1. Plan to meet, as a minimum, the area's objectively assessed housing need. The current Standard Methodology annual housing need figure is currently 514 hpa.
2. Provide Statements of Common Ground in relation to unmet need from neighbouring and PfSH authorities. Any agreements will need to be included as additional housing to the minimum 514hpa.
3. In any event, plan for a level of housing which contributes to the achievement of sustainable development.
4. Treat this plan as an interim plan and reaffirm the Council's commitment to undertake an urgent a review of the Welborne Plan for incorporation into a consolidated early review of this plan.
5. The Council has not undertaken SA of all reasonable alternative housing requirements.
6. The Council has not planned to meet current housing needs, opting instead to phase its housing supply in a way which will exacerbate the current significant under-supply problems.

- 2.30 Consequential to the above, the Council must allocate additional sites for housing in this interim plan (ahead of the urgent review of the Welborne Plan) to meet its confirmed housing target of 514 hpa.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 2.31 The role of plan-making in contributing to the achievement of sustainable development is a legal requirement (Section 39(2) of the Planning and Compulsory Purchase Act 2004).
- 2.32 Revisions to the plan so that it plans, as a minimum, to meet the local objectively assessed need for housing, meet affordable housing need and adequately contribute to meeting unmet need would assist the PLP to meet the Tests of Soundness.

3.0 Specific Proposed Changes

B4c Suggested revised wording of any policy or text

Policy H1: Housing provision

- 3.1 Completely revise the proposed housing target on the basis of the current Standard Methodology figure for the Borough of a minimum of 514 hpa plus an appropriate contribution to meeting sub-regional unmet needs.
- 3.2 Ensure that the revised housing target includes the delivery of a minimum of 220 affordable homes per annum.
- 3.3 Plan to deliver the revised housing target including a five-year supply of deliverable sites. In this regard, Welborne (the supply of housing from which is relied on heavily by the PLP) cannot currently be regarded as "deliverable" as defined in the NPPF.
- 3.4 Consequential updates to paragraphs 4.1 – 4.20 including Tables 4.1, 4.2, 4.3.
- 3.5 Consequential revisions to the list of Housing Allocation Policies under paragraph 4.20 to include allocations sufficient to deliver the revised housing and affordable housing targets.
- 3.6 Policy H1 also seeks to identify a 'phased' requirement. The overall supply is described as at least 8,389 dwellings - this is just 165 dwellings greater than the requirement when the correct local housing need standard method is applied. Given the need to provide for unmet needs from neighbouring authorities this is clearly insufficient and as such further allocations are required.
- 3.7 Policy H1 seeks to 'phase' this supply identifying the following:
 - Approximately 2,250 dwellings (averaging 450 dwellings per annum) between 2021/22 and 2025/2613;
 - Approximately 2,400 dwellings (averaging 480 dwellings per annum)

between 2026/27 and 2030/31; and

- Approximately 3,750 dwellings (averaging 625 dwellings per annum) between 2031/32 and 2036/2037.

- 3.8 This phasing clearly will not meet the overall plan requirement. The rationale for this phasing is due to an anticipation that many of the housing allocations will begin to deliver later in the plan period. This is simply a factor of the sites chosen rather than an evidence-based approach to need. The net effect is that in the early part of the plan period the full need will not be met, exacerbating the current significant housing land supply shortfall in the Borough. This will mean households will either be unable to form or will be forced to move elsewhere to find appropriate accommodation. This not only has an impact upon affordability through increased demand but also has implications for social mobility and health for young and old alike.
- 3.9 The lack of housing to meet needs in the short-term is exacerbated by recent under-delivery of both market and affordable housing. The Council recognises it has under-delivered in recent years due to the reference to the need for a 20% buffer in accordance with NPPF, paragraph 73 (paragraph 4.16, PLP).
- 3.10 The housing requirement in the PLP should not be phased to manufacture a five-year housing land supply in the short-term. The plan should seek to address housing need now – to do otherwise is not justified or effective.
- 3.11 The second part of Policy H1 identifies the sources of supply. Whilst our client does not wish to comment upon individual sites, we do have significant concerns that the sources of supply will not deliver the plan period housing requirement in full. The PLP, paragraph 4.16, acknowledges that many of the chosen sites will not deliver until later in the plan period therefore any slippage in timescale could well push delivery beyond the plan period. Furthermore, the Council is heavily reliant upon delivery at Welborne. Within our comments upon the Plan overall we identify the need for delivery from this site to be reviewed and indeed question whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10.

- 3.12 Furthermore, the Council cannot currently demonstrate a five-year housing land supply. The Council's most recent assessment of its five-year housing land supply suggests a 4.03-year supply. This assessment appears optimistic given recent appeal decisions which identify it is closer 2.4 years. Given these shortcomings it is essential that the PLP seeks to address this under-supply in the short-term.

Section 3: Development Strategy

- 3.13 This section is substantially focussed on restricting development outside the existing settlement policy boundaries of urban areas. This is in conflict with the NPPF, paragraph 11, which advises that "Plans and decisions should apply a presumption in favour of sustainable development" and that "For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change".

- 3.14 The highly restrictive strategic policy approach introduced into the PLP does not accord with this national guidance.

Policy DS1: Development in the Countryside

- 3.15 For housing development which is brought forward in the absence of a 5-year housing land supply, Policy HP4 applies. This will necessarily introduce new built form onto greenfield sites adjacent or well related to existing urban area boundaries. This will inevitably cause a change to the landscape character of the site and immediately adjacent land. Criteria ii) and iii) require proposals to "conserve and enhance landscapes" and "recognise the intrinsic character and beauty of the countryside". It is not clear which "landscapes" are being referred to – presumably this should be restricted to formally designated landscapes or defined "valued" landscapes because otherwise it could be applied to every area of countryside. It is also not clear how, for example, a housing development can "conserve and enhance" a landscape – relevant measures should be defined. Moreover, it is not clear how the extent to which a proposal has recognised "the intrinsic character of the beauty of the countryside" can

be measured. After all, those attributes can be "recognised" but then disregarded. It is true that every area of countryside has a "character" but not that every area of countryside has "beauty".

3.16 Criterion v) should include an exception for development which is brought forward under Policy HP4, where the application of the "tilted balance" would allow the loss of BMVAL.

3.17 Paragraph 3.39 fails to explain how this policy works in relation to housing policies.

Policy DS3: Landscape

3.18 This draft policy designates about a quarter of the land area of the Borough as "Areas of Special Landscape Quality" (as shown on Figure 3.3).

3.19 From the commentary provided in paragraph 3.49, it appears that the Council is equating its 'Areas of Special Landscape Quality' (ASLQ) with 'valued landscapes'. This is questionable. All landscapes are valued at some level by different people. NPPF paragraph 170 triggers a need to consider when landscape value is just a local consideration, or when landscapes are more 'out of the ordinary'. Fundamentally, for a landscape to be a valued landscape, it does not have to be designated - so by designating the ASLQ (or by creating a valued landscape designation) the Council is at risk of creating a policy that is irrelevant, because guidance says that non designated landscapes can be valued, so site-by-site assessments will be required in any event. **Given that Policy DS3 is irrelevant, it is unnecessary and it should be deleted.**

3.20 However, if it is held that Policy DS3 should not be deleted, the following comments apply.

3.21 Paragraph 3.55 states that "...all parts of the Borough have some landscape quality and may be sensitive to landscape change". This is ambiguous. All landscape will be of 'a quality' but quality (in GLVIA3 aligned with condition) is only one consideration of landscape sensitivity.

- 3.22 With regard to "How the policy works", paragraph 3.56 states that "*The criteria within the policy (points a-g) are derived from the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) published by the Landscape Institute.*". The GLVIA is an extensive and diverse document and, if it is to be used as basis for this policy then a specific reference or explanation should be provided as to how points a-g have been derived.
- 3.23 Paragraph 3.57 refers to the submission of "...a proportionate Landscape Assessment". This should be amended to require the submission of a 'Landscape and Visual Impact Assessment'. There are many applications of Landscape Assessment and several forms of reporting. Reference to LVIA would be specific and clear as to what is required (and incidentally relates better to the approaches set out in GLVIA3).

Policy HA1: Land North and South of Greenaway Lane

- 3.24 As set out in the Introduction to these representations, our client has interests in three parcels of land that all form part of the proposed Policy HA1 housing allocation – Land North and South of Greenaway Lane, Warsash. Our client therefore strongly supports Policy HA1 and the identification of their three land interests within this proposed residential allocation.
- 3.25 The three land interests are as follows: 1. Land South of Greenaway Lane (adjacent to 125 Greenaway Lane); 2. Land East of Brook Lane and West of Lockwood Road; and 3. Land East of Brook Lane and North of Warsash Road.
- 3.26 At the time of writing these representations, all three sites are subject to outline planning applications, which have all been considered by Fareham Borough Council's (FBC) Planning Committee. Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) has a resolution to grant outline planning permission for the construction of up to 100 dwellings (Ref. No. P/19/0402/OA). Land East of Brook Lane and West of Lockwood Road has a resolution to grant outline planning permission for the construction of up to 157 dwellings (Ref. No. P/17/0998/OA). Land East of Brook Lane and North of Warsash Road has a resolution to grant outline planning permission for up to 140 dwellings (Ref. No. P/17/0752/OA).

- 3.27 The outstanding matters relating to the outline planning applications are all close to being resolved, especially now that a solution has been agreed in relation to nitrogen deposition into the Solent. It is therefore anticipated that outline planning permission can be granted for all three sites in the near future. Our client then intends to proceed to detailed planning followed by construction stages in a phased but timely manner, such that all three sites are deliverable and can therefore contribute towards the Council's housing land supply position in the short-term.
- 3.28 Whilst our client supports Policy HA1 and the allocation of their land interests for residential development in principle, in their view the wording of the site-specific requirements contained within the policy requires some amendments, as explained below.
- a) The quantum of housing proposed shall be broadly consistent with the indicative site capacity
- 3.29 Policy HA1 sets out an indicative yield for the allocation as a whole of 824 dwellings. This is supported and no changes are suggested to this site-specific requirement. Our client's three land interests could provide up to 366 dwellings when combined. This includes up to 100 dwellings on Land South of Greenaway Lane (adjacent to 125 Greenaway Lane); approximately 126 dwellings on Land East of Brook Lane and East of Lockwood Road (considering our client does not control the easternmost part of the site so cannot deliver all of the 'up to 157 dwellings' approved at the outline stage); and up to 140 dwellings on Land East of Brook Lane and North of Warsash Road. This represents almost 45% of the indicative yield.
- b) Primary highway access should be focused on Brook Lane and Lockwood Road with limited access via Greenaway Lane where necessary, subject to consideration of the impact on the character of Greenaway Lane
- 3.30 This is not supported, particularly having regard to Land South of Greenaway Lane (adjacent to 125 Greenaway Lane). The wording of this site-specific requirement, including the use of 'limited' and 'where necessary', could be

considered to preclude the provision of a primary vehicular access to the Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) from Greenaway Lane.

- 3.31 The wording of site-specific requirement b) is inconsistent with Figure 4.1 – Policy HA1 Indicative Framework Plan contained within the PLP. Figure 4.1 identifies 'Indicative Principal Vehicular Access' points into the HA1 allocation, which are indicated by purple arrows and includes the identification of a principal access to the Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) from Greenaway Lane, located in the north-west corner of the site. Figure 4.1 also identifies two further principal accesses further east along Greenaway Lane associated with other parts of the HA1 allocation (outside of our client's control).
- 3.32 The wording of site-specific requirement b) is also inconsistent with the Illustrative Masterplan that has been approved by the Council as part of the resolution to grant outline planning permission for Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) under Ref. No. P/19/0402/OA. The approved Illustrative Masterplan includes the provision of a primary vehicular access point from Greenaway Lane, located in the north-west corner of the site (in a similar location to the purple arrow shown on Figure 4.1 of the PLP).
- 3.33 The Committee Report relating to the outline application (dated 16 December 2020), discusses highways matters at paragraphs 8.46 to 8.51. It confirms that from a highway safety perspective, the proposed access from Greenaway Lane is acceptable subject to the imposition of planning conditions (requiring the construction of the access junctions and visibility splays in accordance with the approved plans) and financial contributions towards off-site highways works and a Travel Plan.
- 3.34 The Committee Report confirms that the Highway Authority is satisfied that a safe means of access can be provided and identifies this as *"...a significant material planning consideration."* In terms of the impact on Greenaway Lane as a result of the physical alterations proposed as part of the development, the Committee Report states that these *"...are not of a level that would adversely detract from the character of Greenaway Lane or justify refusal of outline*

planning permission." The Committee Report then makes reference to the decision of the Planning Inspectorate in relation to a previous scheme for the site (Ref. No. APP/A1720/W/19/3225866 dated 11 December 2019), in which the Inspector confirms at paragraph 42 that *"...it would be possible to secure complementary development of the Greenaway Lane frontage within the scope of the reserved matters. Furthermore, highways works, and any additional traffic generated by the development, would affect only a very short section of the lane which lacks the more rural character seen towards the east."* At paragraph 38 of the Inspector's decision, it is concluded that *"...no necessity for an alternative access has been demonstrated on highways grounds."*

3.35 On the above basis, it is considered that the wording of site-specific requirement b) is inappropriate and misleading in potentially precluding the provision of a primary vehicular access to Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) from Greenaway Lane. This would be inconsistent with the provisions of Figure 4.1 of the PLP, as well as the Council's recent resolution to grant outline planning permission and conclusions of the previous appeal Inspector.

3.36 Accordingly, the wording of site-specific requirement b) should be amended to state:

"b) Primary highways access should be in accordance with the broad locations of the 'Indicative Principal Vehicular Access' points shown on Figure 4.1."

c) The provision of vehicular highway access between development parcels without prejudice to adjacent land in accordance with Policy D3

3.37 This is supported and no changes are suggested to this site-specific requirement. Figure 4.1 – Policy HA1 Indicative Framework Plan of the PLP shows the location of 'indicative secondary vehicular link roads' which are identified by dotted grey arrows. Our client agrees with the indicative location of these secondary access points within the Policy HA1 allocation, insofar as they relate to their three land interests, although it should be noted some of these connections may be bought forwards as pedestrian/cycle links only at

the detailed planning application stage to avoid more than 100 units having direct access onto Greenaway Lane.

d) The provision of a continuous north-south Green Infrastructure Corridor between the northern and southern site boundaries that is of an appropriate scale to accommodate public open space, connected foot and cycle paths, natural greenspace and wildlife habitats that link the two badger setts and other species, and east-west wildlife corridors. Highway cross-over points shall be limited in number and width and include wildlife tunnels where necessary, in accordance with the Framework Plan

3.38 The provisions of this site-specific requirement are supported in principle. The outline illustrative masterplans for the three parts of the HA1 allocation under our client's control incorporate these measures as far as possible and have been agreed with the Council.

3.39 Figure 4.1 – Policy HA1 Indicative Framework Plan of the PLP shows the location of 'indicative wildlife link tunnels'. This includes one running north-south on Land East of Brook Lane and North of Warsash Road which is accepted.

3.40 Figure 4.1 also shows two tunnels on Land South of Greenaway Lane (adjacent to 125 Greenaway Lane), both of which are shown running north-south. Whilst it is acknowledged that these tunnels are only shown indicatively on Figure 4.1, it is noted that the southernmost tunnel on Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) should in fact be shown running east-west, so that it crosses and runs perpendicular (not parallel to) the 'indicative secondary vehicular link road' in this location, and so that it reflects the line of the green corridor running along the southern boundary of the land parcel. Otherwise, the provision of two tunnels within this part of the allocation is accepted, as is the indicative location and orientation of the northernmost tunnel.

e) The provision of pedestrian and cycle connectivity between adjoining land parcels, as well as providing connectivity with Warsash Road and nearby facilities and services

3.41 This site-specific requirement is supported in principle and the outline illustrative masterplans for the three parts of the HA1 allocation under our client's control incorporate these measures as far as possible and have been agreed with the Council.

3.42 It is noted that it is not possible to provide direct connectivity between the land within the HA1 allocation and Warsash Road to the south, as the boundaries do not immediately adjoin the road. However, the outline illustrative masterplans provide pedestrian and cycle linkages to Brook Lane, which in turn leads to Warsash Road and nearby facilities and services.

3.43 In relation to the development proposals for Land East of Brook Lane and North of Warsash Road, it has previously been proposed to provide a pedestrian/cycle link from the southern boundary of the site into the rear car park of The Victory Hall which fronts on to Warsash Road. However, this proposal was not supported by the relevant stakeholders and so has not been carried forward into the illustrative outline masterplan for the site.

f) Building heights should be limited to a maximum of 2.5 storeys, except for buildings which front onto Greenaway Lane and Brook Lane where building heights shall be limited to a maximum of 2 storeys

3.44 The first part of this site-specific requirement is not supported. It is considered that some elements of 3 storey development are appropriate on the allocation site, provided they are located sensitively in the central parts of the site and setback from the site boundaries, allowing them to be appropriately screened and for a buffer to be provided to existing adjoining land uses. This is consistent with the requirement for the efficient use of land as set out in the NPPF.

3.45 The second part of this site-specific requirement for buildings fronting Greenaway Lane and Brook Lane to be limited to a maximum of 2 storeys is accepted.

g) Existing trees subject to a Tree Preservation Order should be retained and incorporated within the design and layout of proposals in a manner that does

not impact on living conditions

3.46 This is not supported. The wording of this site-specific requirement suggests that any tree that is subject to a Tree Preservation Order (TPO) cannot be removed. This is not appropriate and is not justified, particularly in light of the vehicular link required through TPO woodland in the southern most portion of the allocation. It is possible that cases may arise where it is necessary to remove a tree even if it is subject to a TPO, for example if the tree is no longer in a good condition or if it poses a health and safety risk in the future.

3.47 The wording of this site-specific requirement should be amended to provide greater flexibility and should state:

"Where possible, existing trees subject to a Tree Preservation Order should be retained and incorporated within the design and layout of proposals in a manner that does not impact on living conditions, unless agreed in writing with the Local Authority."

h) A Construction Environmental Management Plan to avoid adverse impacts of construction on the Solent designated sites shall be provided

3.48 This is supported and no changes are suggested to this site-specific requirement.

i) Provide future access to the existing underground water and wastewater infrastructure for maintenance and upsizing purposes (included at the request of Southern Water)

3.49 This is supported and no changes are suggested to this site-specific requirement. These measures can be incorporated into the detailed design for the three land parcels controlled by our client to ensure that future access is provided.

j) The site is identified as a mineral safeguarded site (sand and gravel are likely to underlay site). A Minerals Assessment will be required prior to any

development in accordance with the Hampshire Minerals and Waste Plan (2013)

3.50 The justification and evidence in support of this site-specific requirement are unclear. From our review of the information available on Hampshire County Council's (HCC) website, including the HCC Minerals and Waste Plan (adopted 2013) and its associated online Proposals Map, the HCC Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document (adopted February 2016) and the HCC Minerals and Waste Plan Minerals Consultation Area (2015), the land within the Policy HA1 allocation does not appear to be identified as a minerals safeguarded site or as having any potential to be underlain by any mineral resources.

3.51 Furthermore, this matter has not been raised during the outline planning stages for our client's land interests.

3.52 This site-specific requirement is therefore not supported and should be deleted in relation to the Policy HA1 allocation.

k) Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4 and NE3. In addition, the following site-specific infrastructure will be required:

i) Two junior football pitches on-site; and

ii) Off-site improvements to existing sports facilities

3.53 The wording of site-specific requirement k) implies that financial contributions will definitely be required. This wording should be amended to provide more flexibility, in the event that it is agreed between the relevant parties that contributions are not in fact required in relation to one or more of the matters referred to.

3.54 The provision of reasonable financial contributions towards education and transport are accepted in principle where a specific need is identified and at an appropriate level to be agreed between the relevant parties.

3.55 In terms of our client's three land interests, financial contributions towards

education and transport have been agreed in principle through the resolutions to grant outline planning permission, with Section 106 Agreements to secure these being agreed prior to the outline planning permission for each site being issued.

- 3.56 The reference in site-specific requirement k) to providing contributions towards health is not supported. The Committee Report relating to Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) (Ref. No. P/19/0402/OA dated 16 December 2020) discusses this matter with regard to a request from the University Hospital Southampton NHS Foundation Trust for a financial contribution to provide services needed by the occupants of the proposed new dwellings. The Officer's comments at paragraphs 8.64-8.68 of the Committee Report are as follows:

"In considering the requests it is noted that the construction of houses does not itself lead to population growth. Officers consider that the need for housing is a consequence of population growth. Furthermore, there is no account in the representations, it seems, for the potential for the residents of the new development to be moving locally around the Borough or adjoining boroughs such that their residence locally is already accounted for by the current services and funding commissioned by the hospital...

...The length of time between sites being identified, planning permission being granted, and the houses actually being constructed and subsequently occupied is many years. The amount of residential development coming forward in the Borough which has not been reasonably foreseeable for a period of year is therefore very limited.

In January 2019 the NHS launched its new 10-year plan. This plan sets out how the NHS thinks it can overcome the challenges that the NHS faces, such as staff shortages and growing demand for services. This is to be achieved essentially by doing things differently and at no point does it refer to the need for new developments to provide for healthcare services by means of financial contribution such as that requested by the Trust.

For the reasons set out above, Officers do not consider that the contribution

sought by the Trust is necessary to make the development acceptable in planning terms and thus the tests for planning obligations as set out above are not considered to have been met. Furthermore, given the adopted policy framework it is considered that in the absence of the contribution, the application does not fail as a consequence as this issue alone would not justify a reason for refusal, which it must do in order to make the contribution necessary to make the development acceptable in planning terms and meet the test for a planning obligation."

- 3.57 The same conclusions should be made in terms of site-specific requirement k) and the reference to health should therefore be deleted.
- 3.58 Finally, the requirement to provide two junior football pitches on-site is not supported. During the time that developers in the 'Warsash Cluster' have been in discussion with FBC in relation to their land interests, the Council has not been able to justify why on-site provision is needed and appears to have been an aspiration which has not been properly considered. The provision of sports pitches in this location is not appropriate, particularly having regard to the likely noise and traffic implications associated with this use, as well as the presumed need for a complementary pavilion. Site-specific requirement k) i) should therefore be deleted.
- 3.59 In terms of the requirement to provide off-site improvements to existing sports facilities, this is inconsistent with the financial contributions that have been agreed as part of the resolutions to grant outline planning permission for our client's three land interests and this requirement has not been raised by FBC as part of this process. The wording of site-specific requirement k) should therefore be amended to provide more flexibility, so that it cannot be interpreted that an off-site financial contribution towards sports facilities is required in relation to all land parcels within the Policy HA1 allocation (such as our client's three sites), but so that this can be sought in relation to the other parcels of land if justified and agreed between the relevant parties.
- 3.60 Taking into account all of the above, the wording of site-specific requirement k) should be amended to state:

"Infrastructure provision or contributions including but not limited to education and transport may be necessary in line with Policy TIN4 and NE3. In addition, contributions towards off-site improvements to existing sports facilities may be required."

Figure 4.1 – Policy HA1 Indicative Framework Plan

- 3.61 Figure 4.1 includes the identification of areas referred to as 'open space or development options. Development not on both', which are marked by a light green diagonal hatching. The only areas annotated as such on Figure 4.1 relate to our client's interest at Land South of Greenaway Lane (adjacent to 125 Greenaway Lane) – one is shown at the western end of the site frontage with Greenaway Lane and the other running north-south in the centre of the site.
- 3.62 These annotations are not necessary and should be deleted as their intended purpose is unclear. The agreed illustrative outline masterplan for this site shows that development will be set back from Greenaway Lane with a linear area of public open shown across the entire site frontage, which in turn connects with further public open space shown running north-south through the centre of the site.

Policy HP1: New Residential Development

- 3.63 This policy relates to all new housing proposals. However, it only envisages housing coming forward outside Urban Area boundaries through either the conversion of a non-residential building or as a replacement dwelling. It should also cross-refer to Policy HP4 which allows housing to come forward on land outside Urban Area boundaries if the Council cannot demonstrate a Five-Year Housing Land Supply.

- 3.64 Therefore add:

"c) It is for additional housing in circumstances where the Council cannot demonstrate a Five Year Housing Land Supply and Policy HP4 applies."

Policy HP4: Five-Year Housing Land Supply

3.65 The housing requirement set out in Policy H1 must be re-calculated using the current Standard methodology as described in our comments on draft Policy H1 above.

3.66 Paragraph 5.24 infers that Policy HP4 reproduces Local Plan Part 2 Policy DSP40. However, the third criterion in Policy DSP40 was as follows:

"iii) The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;"

3.67 This has been replaced in Policy HP4 by:

"c) The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant, does not significantly affect the integrity of a Strategic Gap;"

3.68 If a five-year housing land supply cannot be demonstrated, then in accordance with the NPPF, paragraph 11d, the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply. This policy may therefore be judged to be inappropriate because it adds restrictions which may prevent sustainable sites from coming forward. However, if such a policy is held to be necessary, then a faithful reproduction of Policy DSP40 iii) is strongly preferred. See our comments on Policy DS1 in this regard.

Policy HP5: Provision of Affordable Housing

3.69 This draft policy states that "affordable housing must be provided" (our underlining) in the following proportions:

- i. At least 10% as Social Rent; and
- ii. At least 55% as Affordable Rent or Social Rent; and

- iii. The remainder, but no less than 10% as Affordable Home Ownership.
- iv. The mix of property size and type should reflect the local need and the site characteristics.

3.70 As drafted this policy is not sufficiently flexible. As acknowledged at paragraph 5.36, development viability will be an issue on some sites. As acknowledged at paragraph 5.39, occasionally the tenure mix prescribed by the policy will not be appropriate; and as acknowledged at paragraph 5.34, other exceptional circumstances may arise (such as abnormal costs) which dictate that a non-standard provision of affordable housing is demonstrated to be appropriate.

3.71 Therefore, amend the first part of the policy to read:

"Sites that can accommodate 10 or more dwellings or sites with an area of 0.5 hectares or more shall normally provide: ..."

3.72 And amend the second part of the policy to read:

"The affordable housing shall normally be provided in accordance with the following proportions: ..."

Policy HP7: Adaptable and Accessible Dwellings

3.73 This draft policy states:

"Development proposals for all new dwellings shall provide:

- a) At least 15% of all new dwellings at Category 2 standard; and
- b) On schemes of over 100 dwellings (gross), at least 2% of private housing and 5% of affordable housing shall be provided as wheelchair accessible Category 3 properties."

3.74 Similar to Policy HP5 above, as drafted this policy is not sufficiently flexible. It is acknowledged that this policy is based on the requirements of Part M of the Building Regulations but it must allow for circumstances arising which mean that these requirements cannot be delivered (fully or otherwise).

3.75 Therefore, amend the first line of the policy to read:

**"Development proposals for all new dwellings shall normally provide:
..."**

3.76 Paragraph 5.57 of the supporting text states:

"The cost to development for providing Category 2 and 3 is relatively minimal. Flexibility for additional costs have been factored into the viability evidence base and this indicates that the requirements for Category 2 and 3 should have no detrimental impact on the viability of schemes in the Borough..."

3.77 This statement is strongly disputed. In reality, these costs will not be factored into a developer's viability calculations (particularly in relation to Category 3 requirements) because option agreements / conditional contracts will have already been agreed on the sites that the Council want to see come forward, so these costs will not have been anticipated. The Category 3 requirements must be substantiated by quantified evidence of the need for such units in the Borough.

Policy HP9: Self and Custom Build Homes

3.78 This policy requires 10% of dwellings on sites of 40 dwellings or more to be provided for Self and Custom Build Homes. The practical implications of managing self or custom build developments on sites otherwise being constructed by housing developers or housing associations must be carefully considered. There is concern that 40 dwellings is too small a threshold at which to introduce this requirement due to the potentially onerous construction management implications which will arise. It would be preferable for the Council to allocate specific sites for self and custom build developments instead of requiring this element on all housing developments of 40 dwellings or more.

3.79 It is noted that, as stated at paragraph 5.70, only 1% of housing plots at Welborne are required to be provided for self or custom build under the Welborne Plan (2015). Strategic allocations such as Welborne provide the ideal opportunity for parcels of land to be allocated for self or custom build, so that

opportunity should not be missed. This should be addressed in the review of the Welborne Plan which is overdue and necessary.

Policy D1: High Quality Design and Place Making

- 3.80 This is a highly aspirational policy which sets out ten criteria ("key characteristics of high quality design") against which all development proposals will be judged "to ensure the creation of quality places." It is not clear what a "quality place" is – this should be defined. The ten criteria push the "bar" too high – all proposals cannot be expected to "create places that are attractive, memorable, distinctive and of strong character", for example, laudable though those aspirations are. In practice, very few proposals would receive planning permission if assessed against this requirement.

Appendix B: Housing Trajectory

- 3.81 This appendix must be updated as it does not reflect the quantum of housing required to meet the local needs. It also projects completions of 975 homes in 2023/24 and 961 homes in 2024/5, which are at risk due to the delays to Welborne which continue. Completions from Welborne should be shown separately as previously.

4.0 Participation at the Examination Hearing Sessions

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

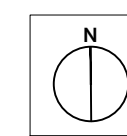
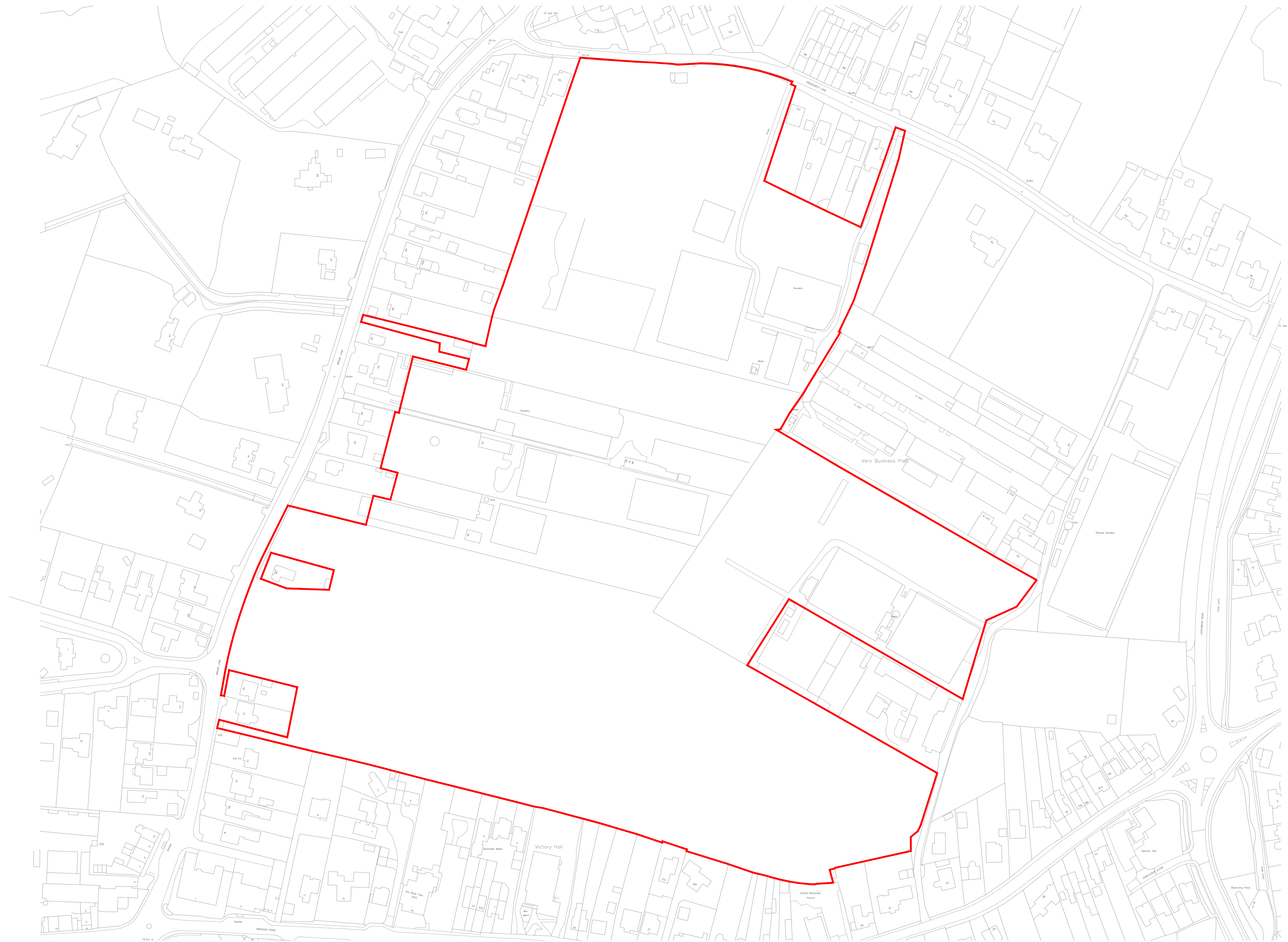
4.1 Yes, we want to take part in a hearing session.

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

4.2 To contribute to testing the legal compliance and soundness of the PLP for the reasons set out in these representations.

APPENDIX 1

Site Location Plan (Drawing No. FLPR-LP.01 – Rev P1)



Romsey Office Building 300, The Grange, Romsey Road, Michelmersh, Romsey, Hampshire, SO51 0AE T:01794 367703 F:01794 367276	Portsmouth Office Unit 5, Middle Bridge Business Park Bristol Road, Portsmouth, Bristol, BS20 6PN T:01275 407000 F:01794 367276
---	---

www.thrivearchitects.co.uk

This drawing is the copyright of Thrive Architects Ltd ©. All rights reserved. Ordnance Survey Data © Crown Copyright. All rights reserved. Licence No. 100007359. DO NOT scale from this drawing. Contractors, Sub contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect. Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

Rev	Description	Date	Au	Ch
P1	Preliminary issue.	18.12.20	CMI	-

Project	Fareham Local Plan Representation		
Drawing	Location Plan		
Client	Bargate Homes		
Job no.	-	Date	Dec'20
Dwg no.	FLPR-LP.01	Rev.	P1
Author	CMI	Checked	-
Status	PRELIMINARY	Scale	1:1250 at A1
Client ref.		Office	Romsey



Keely, Lauren

From: Consultation
Sent: 18 December 2020 11:25
To: Planning Policy
Subject: Pegasus Group (on behalf of Bargate Homes & Sustainable Land)
Attachments: BRS.4989.Reps01aDec2020.pdf; BRS.4989 Form Dec2020.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Daniel Millward <[REDACTED]>
Sent: 18 December 2020 09:59
To: Consultation <Consultation@fareham.gov.uk>
Cc: Daniel Weaver <[REDACTED]>
Subject: BRS.4989 Fareham Local Plan Representations on behalf of Newgate Homes and Sustainable Land Products Ltd

Dear Sir/Madam,

Please see attached representations and accompanying form on behalf of Newgate Homes and Sustainable Land Products Ltd.

These representations make some general comments on the plan as a whole, before then making specific representations in respect of policies DS2, H1 and HP4.

I trust the attached are of use and self-explanatory. However, if you have any further questions, please do not hesitate to contact me.

Kind regards,

Daniel Millward
Senior Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury|Bristol|BS32 4QL



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



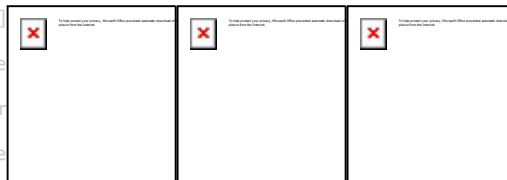
www.pegasusgroup.co.uk

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.


This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We



have updated our Privacy Statement in line with the GDPR; please click here to view it.

 Please consider the environment before printing this email message.

*****IMPORTANT INFORMATION REGARDING PEGASUS GROUP & CORONAVIRUS / COVID-19*****

After the extraordinary events of 2020, may we wish you a peaceful Christmas and a Happy New Year.

Our company will take a break over the festive period so Pegasus Group will close from 5.30pm on

Wednesday 23rd December 2020 and reopen at 9am on **Monday 4th January 2021**



This is a placeholder for a missing image. Please check the link to the image in the email body.

FAREHAM LOCAL PLAN 2037 REPRESENTATIONS

LAND AT NEWGATE LANE (NORTH AND SOUTH), FAREHAM

ON BEHALF OF BARGATE HOMES LTD AND SUSTAINABLE LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Matthew Good



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0 Introduction / Details..... 1

2.0 Plan Overall 4

3.0 Strategic Policy DS2: Development in Strategic Gaps 6

4.0 Policy H1: Housing Provision (including supporting text) 12

5.0 Policy HP4: Five-Year Housing Land Supply 19

6.0 Participation at the examination hearing sessions..... 21

APPENDICES:

APPENDIX 1:	LANDSCAPE EVIDENCE
-------------	--------------------

1.0 Introduction / Details

- 1.1 The following representations are made by Pegasus Group on behalf of our clients Bargate Homes Ltd and Sustainable Land. Our clients have interests in an area of land between Newgate Lane and Newgate Lane East (the new relief road) in Peel Common. Applications for outline planning permission (refs. P/18/1118/OA and P/19/0460/OA) have been made at 'Land at Newgate Lane' which together will provide for the development of up to 190 homes. Both applications are currently the subject of undetermined appeals.
- 1.2 Representations have been made in respect of the sites in response to the Regulation 18 consultation on the original version of the draft Local Plan in December 2017, and again in July 2019 and in February 2020 on subsequent consultations for the new Local Plan. The site continues to be promoted through the Local Plan process as it represents a sustainable and deliverable option to deliver much needed housing in this authority.
- 1.3 Our clients are important stakeholders within Fareham and are keen to work with the Council to produce a plan which is legally compliant and meets the tests of soundness set out within the National Planning Policy Framework (NPPF).
- 1.4 The following representations utilise the same format as the Council's response form. Each area of the Publication Local Plan (PLP) which is deemed to be either not legally compliant or unsound is clearly outlined below. The exceptions are questions A (1,2 & 3) and B5 (parts a & b) where a single response at the beginning and end of the representations is provided, respectively. This is because these responses are common to all questions and our representations.



FIGURE 1 – NEW GATE LANE NORTH

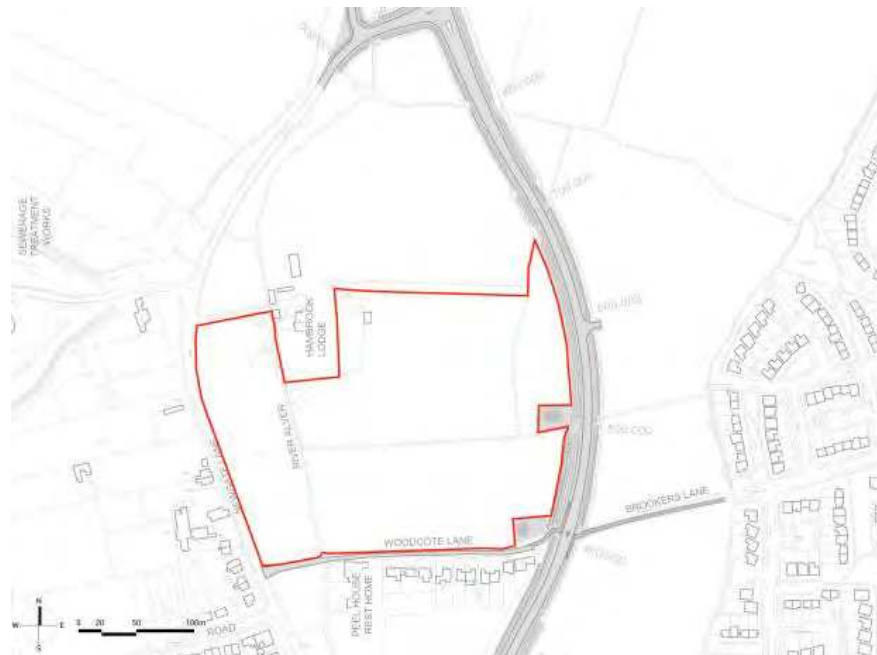


FIGURE 2 – NEW GATE LANE SOUTH

Questions A1, A2, A3 Agent / Client details

	Agent	Client
Title	Mr	Bargate Homes and
First Name	Daniel	Sustainable Land c/o
Last Name	Weaver	Agent
Job Title	Executive Director	
Organisation	Pegasus Group	
Address	First Floor	
	South Wing	
	Equinox North	
	Great Park Road	
	Almondsbury	
	Bristol	
Postcode	BS32 4QL	
Telephone	01454 625945	
Email	c/o	
	Daniel.millward@pegasusgroup.co.uk	

2.0 Plan Overall

B1 Which part of the Local Plan is this representation about?

2.1 The following comments relate to the overall Local Plan.

B2 Do you think the Publication Local Plan is:

Legally compliant - No

Sound - No

Complies with the duty to co-operate - No

2.2 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

2.3 The NPPF (paragraph 33) states that plans should be reviewed every 5 years and updated as necessary. Previously the local planning authority indicated that this local plan review would amalgamate the adopted Local Plan Parts 1, 2 and 3 into a single new plan. Part 3 is the Welborne Plan which was adopted in 2015. The total quantum of housing to be delivered at Welborne has reduced over the years, and the date for its commencement has repeatedly slipped back. Recently, serious doubts have been expressed over whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10. Certainly, the development is not currently "deliverable" in NPPF terms.

Taking all of this into account, the Welborne Plan should be reviewed, which it has not (PLP paragraph 4.9). It is also clear that at this stage the Council suggests that it is not intending to review the Welbourne Plan (Local Development Scheme (LDS), paragraph 1.5). Given the importance of the Welborne Plan to housing delivery this is considered an issue of both soundness and legal non-compliance.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

2.4 Include a review of the Welborne Plan in this Local Plan review.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

2.5 Compliance with the NPPF requirement to review plans and provide an up to date framework to ensure housing delivery.

B4c Your suggested revised wording of any policy or text

2.6 Not applicable.

3.0 Strategic Policy DS2: Development in Strategic Gaps

B1 Which part of the Local Plan is this representation about?

- 3.1 The following comments relate to the Policy DS2, the supporting text and the inclusion of our clients' land between Newgate Lane and Newgate Lane East (the new relief road) in Peel Common within this designation.

B2 Do you think the Publication Local Plan is:

Legally compliant – N/ A

Sound - No

Complies with the duty to co-operate – N/ A

- 3.2 The Fareham Local Plan is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

- 3.3 The PLP, paragraph 3.43, identifies that the:

"...primary purpose of identifying Strategic Gaps is to prevent the coalescence of separate settlements and help maintain distinct community identities. Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, defining settlement character and providing green infrastructure opportunities."

- 3.4 The proposed policy seeks to strengthen the current Core Strategy policy position, contained within Policy CS22 with regards to preventing settlement coalescence. It is stated in the PLP this has been undertaken in response to the NPPF and recent planning decisions (paragraph 3.44). The Council's evidence in relation to this policy is contained within the September 2020 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' document. Chapter 2, section 4.2, seeks to apply the NPPF to this policy.

3.5 The interpretation of the NPPF in this section is selective and as such misleading. For example in referencing paragraph 20 of the NPPF it states:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... conservation and enhancement of the natural, built and historic environment, including landscapes."

3.6 This fails to recognise that strategic policies should also set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. The Council's evidence also refers to paragraph 170 of the NPPF noting:

"planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan)".

3.7 It must, however, be recognised that the strategic gaps do not have any statutory status therefore shouldn't be unduly restrictive. A tightening of restrictions would be contrary to the NPPF. The policy does identify that development can be accommodated within the Strategic Gap. Indeed, the previous iteration of the plan identified site HA2 and Strategic Growth Areas within the Fareham – Stubbington Strategic Gap. Thus, suggesting that development in the gap is not prohibitive per se.

3.8 Within our representations on the draft Local Plan Supplement we argued the evidence base lacks robustness and has been applied without justification. The updated evidence does not overcome these concerns. Our clients site is situated within parcel 8c of the updated evidence. The study suggests that despite the proximity of Fareham and Gosport in the north part, the gap is currently still effective in providing a 'sense of separation', but it is at risk. It is further noted at point 15 that;

"Whilst the recently completed Newgate Lane South road development does not alter the experience of entering the urban area of Gosport beyond the Peel Common Roundabout, it does reduce tranquillity and bring more built features

(such as noise attenuation barriers) into this part of the gap.”

- 3.9 Despite this significant development, the ‘Technical Review of Areas of Special Landscape Quality and Strategic Gaps’ simply re-iterates previous conclusions from earlier analysis undertaken by LDA and described in the Fareham Borough Landscape Character Assessment, 2017. There is no consideration as to how the development of Newgate Lane South has altered the area. Clearly, the new highway has added a substantial urbanising influence upon the gap, this should be assessed. The blanket approach taken within the policy does not recognise these substantial changes.
- 3.10 Within our client’s appeal evidence in relation to applications P/18/1118/OA and P/19/0460/OA we provide evidence in relation to landscape and visual matters. This evidence takes full consideration of the strategic gap and identifies that Peel Common is not well defined as a coherent area of settlement character due to the fact the settlement appears to be based on the progression of wayside and ribbon development since the early twentieth century. It also notes that the amenity value of the area has altered since the completion of Newgate Lane East. It was concluded that this parcel makes a limited contribution to the wider context of the strategic gap.
- 3.11 The protection of the Strategic Gap is currently governed by policy CS22 of the Core Strategy, which does not permit development where it significantly affects the integrity of the gap. The policy provides a useful starting point for considering the purpose of strategic gaps. It states:
- 3.12 *“Their boundaries will be reviewed in accordance with the following criteria:*
- a) The open nature/sense of separation between settlements cannot be retained by other policy designations;*
 - b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;*
 - c) 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 their physical and visual separation.”*

3.13 Taking each of these key criteria in turn:

Openness and sense separation

3.14 Although the proposed development site is a greenfield site within the countryside, it would not represent isolated development. The site is located to the west of the settlement of Bridgemary. The development will become a cohesive part of the Bridgemary neighbourhood through the provision of key pedestrian links and local facilities (open space and children's play areas) for the benefit of the wider community.

3.15 The site is bounded by Newgate Lane East to the east. To the west it is bounded by Newgate Lane, which is the focus of ribbon development, and beyond this the Peel Common Waste Water Treatment Works and solar farm. If the site is not developed, then it will be an open pocket of land between the two roads within an otherwise urbanized landscape, which in our view is of inherently less value in terms of its contribution to the strategic gap.

3.16 It is notable that the Council's evidence 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' identifies the Peel Common Waste Water Treatment Works to provide a strong physical and visual gap between Gosport and Stubbington (Area 8b), and to a lesser extent so does the Solar Farm. This physical and visual gap would not be affected by development on our clients' sites.

3.17 The Council's evidence also identifies that a Green Infrastructure (GI) Strategy or Framework would be beneficial to enhance the GI value of the current gap and potentially help determine an appropriate GI framework for moderately scaled development. Our clients' proposals would enhance the provision of GI through the provision of on-site open space and pedestrian linkages. It should be noted that due to the site being within private ownership there is currently no public right of way connectivity, such that it has no real functional value as GI other than its contribution to a wider landscape setting.

3.18 As such, although the development of the site would necessarily have an urbanizing effect on the existing open land, good growth could be achieved without compromising the gap between the existing urban edge of Fareham/Bridgemary and Stubbington.

Defining the Settlement Character and Preventing Coalescence

- 3.19 The character of the site and surrounding area is defined by both the natural and built environment, having regard to the landscape setting in which it sits.
- 3.20 The development of the site, by extending the boundary of the Fareham/Gosport built-up area would not have the effect of coalescence with Stubbington. The settlement character of Bridgemarky is distinct from that of Stubbington. Whilst both are characterized by large areas of low-rise, medium-density development from the late-20th century (and in the case of Bridgemarky also from the pre-war era), the development of Bridgemarky as a suburban extension of Fareham/Gosport lends it a different character compared with Stubbington's growth as a distinct village with a more extensive local centre.
- 3.21 The remaining Strategic Gap will still achieve a 'green' gap between the two settlements such that the distinct identities of the two settlements are reinforced by their physical and visual separation.

Extent of Gap Required

- 3.22 Most obviously, the development of the Land at Newgate Lane would retain a 'green' gap between the two settlements. The extent of this gap remaining is sufficient to prevent coalescence in line with the policy consideration in Core Strategy Policy 22.
- 3.23 This green gap will also help to retain the physical and visual separation of the settlements, an effect which will be further enhanced by the introduction of the Stubbington By-Pass which will serve to sever them further. The location of Land at Newgate Lane is not within the 'pinch point' between Fareham and Stubbington. Further north, the Strategic Gap between the two settlements narrows, and an extension to Fareham in this location would reduce the gap to a much greater degree or eliminate it. This makes Land at Newgate Lane a preferable development location than sites north of Peel Common/West of Fareham in terms of impact on coalescence.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

- 3.24 The policy and proposals map should be amended to either exclude our client's site from the strategic gap or it should be identified as a location which could accommodate sensitive development.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 3.25 It would be justified by the evidence and would assist the Council in achieving an appropriate housing requirement.

B4c Your suggested revised wording of any policy or text

- 3.26 See response to B4a above.

4.0 Policy H1: Housing Provision (including supporting text)

B1 Which part of the Local Plan is this representation about?

4.1 Policy H1: Housing Provision and all supporting text.

B2 Do you think the Publication Local Plan is:

Legally compliant - No

Sound - No

Complies with the duty to co-operate - No

4.2 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective, positively prepared or justified.

B3 Please provide details you have to support your answers above.

4.3 The PLP has based its housing proposals on the annual housing target derived from the Government's draft Revised Standard Methodology published in August 2020 in its consultation "Planning for the Future". The Government's response to this consultation was published on 16th December 2020. The Government does not propose to proceed with the changes to assessing local housing need consulted on earlier this year in the "Changes to the Current Planning System"; but instead has published a revised approach to the standard method, which retains the method in its current form except for London and 19 of the most populated cities and urban centres.

4.4 The key change is to apply a 35% uplift to the standard method for Greater London and the 19 most populated cities and urban areas in England – Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke on Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton and Brighton and Hove. The minimum housing requirement for Fareham calculated using the amended standard method therefore remains 514hpa.

- 4.5 The National Planning Policy Framework (NPPF) states (paragraph 16 a) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". Footnote 10 confirms that this is a legal requirement of local planning authorities in exercising their plan-making functions. Meeting the objectives of sustainable development includes "...meeting the needs of the present...". By preparing a Plan based on a consultation draft Standard Methodology target of 403 dwellings per annum, the local planning authority is failing to meet its local objectively assessed need for housing, thereby failing to plan to deliver sustainable development.
- 4.6 The lower housing requirement has also not been the subject of sustainability appraisal (SA). Whilst the SA re-assesses sites based upon a lower housing requirement it fails to consider the implications of a lower housing requirement, compared to the current standard method, upon the delivery of the SA objectives.
- 4.7 The Plan does not seek to, as a minimum, meet the area's objectively assessed need. Given that the Core Strategy was adopted on 4th August, 2011, it is significantly out of date such that (as advised by paragraph 73 and footnote 32 of the NPPF) local housing need should be calculated using the current Standard Methodology. On this basis the extant local housing need target is 514 homes per annum (hpa). Instead, the PLP plans for 403hpa, thereby failing to plan for the area's objectively assessed need and failing to contribute to the achievement of sustainable development.
- 4.8 The PPG (ID 2a-003-20190220) is clear that the current standard method should be used and any other method should only be used in exceptional circumstances. It further explains that:
- "...Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."* (PPG ID 2a-015-20190220).

- 4.9 As discussed above the extant standard method identifies a requirement of 514hpa. The NPPF (paragraph 60) identifies that the current standard method provides a minimum requirement. To depart and provide a figure lower than the current standard method must be justified by clear and robust evidence. This is absent from the Council's evidence base and as such is an unsound approach.
- 4.10 The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure. However, given that there is no change for Fareham this is irrelevant.. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on a figure of 403hpa is procedurally flawed, lacking in evidential basis, premature and potentially misleading.
- 4.11 It is also unclear whether the PLP has planned to adequately accommodate unmet need from other authorities. The PPG (ID 2a-010-20190220) identifies that meeting unmet needs from neighbouring authorities, as set out in a statement of common ground, is one reason why local housing need calculated using the current standard should be exceeded.
- 4.12 Paragraph 4.4 of the PLP states that unmet need in the sub-region over the plan period could be "circa 10,750 dwellings". At paragraph 4.5, Fareham's "immediate neighbours" are considered, and it is confirmed that Portsmouth City Council has requested that Fareham contributes 1,000 dwellings towards its unmet need, and that Gosport is "likely to have an unmet need issue, currently estimated to be in the region of 2,500 dwellings...". However, in response, the PLP (Table 4.1) proposes a contribution of 847 dwellings to wider unmet need. This produces an overall plan requirement of 7,295 dwellings, equivalent to 456hpa. The Council's 'Duty to Co-operate Statement of Compliance' identifies at paragraph 4.6 that instead of responding to the request from Portsmouth the Council is proposing to: *"...take the approach that the issue of unmet need is not dealt with as specific to any authority, but as a general contribution."* It is not clear how this "general contribution" has been calculated but it appears inadequate.

4.13 Contrary to the advice within the PPG (ID 2a-010-20190220) there are currently no statements of common ground identifying if the figure of 847 dwellings is adequate or accepted by other authorities. Rather, the Council speculates that this contribution would be “ratified” by a subsequent Partnership for South Hampshire Statement of Common Ground (Duty to Co-operate Statement of Compliance, paragraph 4.5). There is, however, no evidence to support this speculation. Indeed, the only evidence presented suggests a higher requirement of 1,000 dwellings from a single authority.

4.14 Fareham has decided to deliberately plan to not meet its local objectively assessed housing need, which fundamentally means that the plan will not be effective. This, coupled with its apparent failure to plan to contribute appropriately to the unmet housing need of the sub-region, indicates a failure to work effectively with its neighbouring authorities on cross-boundary strategic planning for housing delivery and a failure “to support the Government's objective of significantly boosting the supply of homes” (NPPF, paragraph 59). Rather, the PLP proposes to restrict the supply of homes in the plan period in a way which will exacerbate the local housing crisis.

4.15 The PLP is not consistent with the NPPF because:

- It will not contribute to the achievement of sustainable development by not, as a minimum, planning to meet its local objectively assessed housing need;
- It is not planning to adequately meet the unmet housing needs of neighbouring authorities in the sub-region;
- It has not based its housing proposals on the current Standard Methodology;
- Its strategy lacks a robust evidential justification.

Phased Provision

4.16 In addition to the issues with the overall requirement, Policy H1 also seeks to identify a ‘phased’ requirement. The overall supply is at least 8,389 dwellings this is just 165 dwellings greater than the requirement when the correct local housing need standard method is applied. Given the need to provide for unmet needs from neighbouring authorities this is clearly insufficient and as such further allocations are required. Policy H1 seeks to ‘phase’ this supply identifying the following:

- Approximately 2,250 dwellings (averaging 450 dwellings per annum) between 2021/22 and 2025/2613,
- Approximately 2,400 dwellings (averaging 480 dwellings per annum) between 2026/27 and 2030/31,
- Approximately 3,750 dwellings (averaging 625 dwellings per annum) between 2031/32 and 2036/2037.

4.17 This phasing clearly will not meet the overall plan requirement. The rationale for this phasing is due to an anticipation that many of the housing allocations will begin to deliver later in the plan period. This is simply a factor of the sites chosen rather than an evidence-based approach to need. The net effect is that in the early part of the plan period the full need will not be met. This will mean households will either be unable to form or will be forced to move elsewhere to find appropriate accommodation. This not only has an impact upon affordability through increased demand but also has implications for social mobility and health for young and old alike.

4.18 The lack of housing to meet needs in the short-term is exacerbated by recent under-delivery of both market and affordable housing. The Council recognises it has under-delivered in recent years due to the reference to the need for a 20% buffer in accordance with NPPF, paragraph 73 (paragraph 4.16, PLP).

4.19 The housing requirement in the PLP should not be phased to manufacture a five-year housing land supply in the short-term. The plan should seek to address housing need now and to do otherwise is not justified or effective.

Housing Supply

4.20 The second part of Policy H1 identifies the sources of supply. Whilst our clients do not wish to comment upon individual sites, we do have significant concerns that the sources of supply will not deliver the plan period housing requirement in full. The PLP, paragraph 4.16, acknowledges that many of the chosen sites will not deliver until later in the plan period therefore any slippage in timescale could well push delivery beyond the plan period. Furthermore, the Council is heavily reliant upon delivery at Welborne. Within our comments upon the Plan overall we identify the need for delivery from this site to be reviewed and indeed question whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27

junction 10.

4.21 Furthermore, the Council cannot currently demonstrate a five-year housing land supply. The Council's most recent assessment of its five-year housing land supply suggests a 4.03-year supply. This assessment appears optimistic given recent appeal decisions which identify it is closer 2.4-years¹. Given these shortcomings it is essential that the PLP seeks to address this under-supply in the short-term.

4.22 Our client's sites, SHLAA references 3129 and 3161, should be considered for allocation. Both sites are sustainable being well located in terms of accessibility to services, facilities and employment. They also have good access to public transport opportunities. Furthermore, whilst the sites are located within the Fareham – Stubbington Gap, there are no unsurmountable specific statutory or non-statutory landscape related planning designations.

4.23 The SHLAA identifies that both sites are discounted because:

"Development in this location would not be in keeping with the settlement pattern and would change the settlement character of Peel Common. The site is therefore considered unsuitable for residential development."

4.24 Our clients fundamentally disagree with these points. This is discussed in greater detail within our response to Policy DS2 above. However, in summary the sites are well located in relation to the settlement of Bridgemary and our evidence identifies that development in this location would have a limited impact due to the recent completion of the Newgate Lane East site. The proposals could also enhance the strategic gap through the provision of appropriate Green Infrastructure.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

4.25 The following amendments are necessary to ensure that the plan is legally compliant and sound.

¹ APP/A1720/W/19/3230015

1. Plan to meet, as a minimum, the area's objectively assessed housing need. The current Standard Methodology annual housing need figure is currently 514hpa.
2. Provide Statements of Common Ground in relation to unmet need from neighbouring and PfSH authorities. Any agreements will need to be included as additional housing to the minimum 514hpa.
3. In any event, plan for a level of housing which contributes to the achievement of sustainable development.
4. Undertake SA of all reasonable alternative housing requirements.
5. Provide a housing requirement which is not phased and meets needs now.
6. Provide additional allocations, including our clients, which can deliver in the short-term.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 4.26 Compliance with the NPPF requirement for the housing requirement to be based upon current local housing need standard method as a minimum. To comply with relevant legal and procedural requirements.

B4c Your suggested revised wording of any policy or text

- 4.27 Not applicable, as this will be dependent upon the outcome of the work identified in response to question B3.

5.0 Policy HP4: Five-Year Housing Land Supply

B1 Which part of the Local Plan is this representation about?

5.1 The following comments relate to Policy HP4 and all supporting text.

B2 Do you think the Publication Local Plan is:

Legally compliant – N/ A

Sound - No

Complies with the duty to co-operate – N/ A

5.2 The Fareham Local Plan is unsound as it is not effective or justified.

B3 Please provide details you have to support your answers above.

5.3 Whilst the principle of the policy is supported the current wording is considered contrary to its stated purpose. The supporting text identifies that this policy is required to provide flexibility if a five-year housing land supply cannot be demonstrated. However, in accordance with the NPPF, paragraph 11d, in such cases the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply.

5.4 It is therefore not justified to seek to apply additional requirements upon developments should a five-year supply not be demonstrable. For example, the requirement for the scale of the site to be relative to the shortfall is not only unclear but could be prohibitive of sustainable sites being brought forward. Furthermore, many of the criteria are replicated from other policies and as such are superfluous.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

5.5 A more positive policy is justified. Parts a, c, d and e should be deleted to avoid repetition and conflict with the NPPF.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

5.6 See above.

B4c Your suggested revised wording of any policy or text

5.7 See above.

6.0 Participation at the examination hearing sessions

B5a If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

6.1 Yes, I want to take part in the hearing sessions.

B5b Please outline why you consider it necessary to take part in the hearing session(s):

6.2 There are several detailed and complex points made within our representations which would benefit from further debate and consideration. It is also important that our clients can respond orally to hearing statements made by the Council and other participants to ensure that the Inspector has a full understanding of our case.

APPENDIX 1

LANDSCAPE EVIDENCE

FL&BH 1.1

APPEAL BY FAREHAM LAND LP AND BARGATE HOMES LTD

LAND AT NEW GATE LANE (NORTH) AND LAND AT NEW GATE LANE (SOUTH), FAREHAM, HAMPSHIRE

LANDSCAPE AND VISUAL MATTERS: PROOF OF EVIDENCE

PREPARED BY:

JAMES W. ATKIN
BSC (Hons) DIP LM CMLI



5 The Priory, Old London Road, Canwell, Sutton Coldfield, B75 5SH

T 0121 308 9570 www.pegasusgroup.co.uk

CONTENTS

1. INTRODUCTION	2
2. THE APPEAL SITES	5
3. BACKGROUND TO THE APPEAL	8
4. ANALYSIS OF LANDSCAPE AND VISUAL MATTERS	16
5. RESPONSE TO POLICY	41
6. SUMMARY AND CONCLUSION	46

APPENDICES:

(REFER TO SEPARATE DOCUMENT REF. FL&BH 1.2)

APPENDIX FL&BH 1.2.1	Extract from the Fareham Landscape Assessment
APPENDIX FL&BH 1.2.2	Composite Landscape Strategy
APPENDIX FL&HB 1.2.3	Extract from the 'Technical Review of AoSLQ and Strategic Gaps'
APPENDIX FL&BH 1.2.4	Landscape Analysis of the Strategic Gap

1. INTRODUCTION

Qualifications and Experience

- 1.1. My name is James Atkin. I hold the position of Director (Landscape) in the Birmingham Office of the Pegasus Group. The Company undertakes all aspects of planning, urban and landscape design and environmental planning. I have a Bachelor of Science Degree in Landscape Design and Plant Science and a Diploma in Landscape Management, both from the University of Sheffield. I am also a Chartered Member of the Landscape Institute (2005).
- 1.2. I have over 19 years professional experience specialising in the application of landscape and visual assessment and the use of best practice guidance. I have authored landscape and visual impact appraisals, assessments and evidence, both in the UK and in the international context.
- 1.3. Prior to joining the Pegasus Group I have worked in multidisciplinary consultancies, including Wardell Armstrong LLP and Atkins, advising on landscape and visual matters across a range of sectors including power, highways, rail, housing, waste, land reclamation and restoration, mineral extraction, commercial developments and renewable energy.
- 1.4. Since joining the Pegasus Group I have completed a number of detailed LVIA's for sites across the UK, including residential development and mixed use development schemes, care home developments, solar installations and commercial development. As an inherent part of this work I apply an iterative process of landscape and visual appraisal and assessment to inform masterplanning principles which avoid or respond to landscape and visual constraints and opportunities.
- 1.5. In this context I have produced technical documents on landscape and visual matters for use in the emerging design process, for planning applications and at appeal. I am currently involved in a variety of projects for mixed use and residential masterplans, of varying scales between 10 and 1000 units, in both urban and urban fringe environments, where matters of sensitive and designated landscapes are key considerations. The diversity of these different project types has enabled me to develop a strong understanding as to how different landscapes can respond to different types of development.

Terms of Reference

- 1.6. This evidence is written on behalf of Fareham Land LP and Bargate Homes Ltd (the appellants) and relates to an appeal for non-determination by Fareham Borough Council in respect of two outline applications for residential development, both on land to the east of Newgate Lane. This evidence sets out an overview of relevant landscape and visual matters.
- 1.7. The outline application for 'Land at Newgate Lane (North)' (Fareham Land LP; LPA ref. P/18/1118/OA) sought permission for:
- The demolition of existing buildings and development of up to 75 dwellings, open space, vehicular access point from Newgate Lane and associated and ancillary infrastructure, with all matters except access to be reserved.
- 1.8. The outline application for 'Land at Newgate Lane (South)' (Bargate Homes Limited; LPA ref. P/19/0460/OA) sought permission for:
- The demolition of existing buildings and development of up to 115 dwellings, open space, vehicular access point from Newgate Lane and associated and ancillary infrastructure, with all matters except access to be reserved.
- 1.9. These are referred to as the 'northern' site and the 'southern' site respectively.
- 1.10. Whilst the two sites are subject of separate applications, it is important to note that the proposals have always been conceived as a cohesive development, together addressing the constraints and opportunities in respect of the local landscape context and providing a cohesive and complementary strategy for development and mitigation.
- 1.11. The evidence presented herein applies to both appeals, unless specifically stated otherwise.
- 1.12. Each application was supported by a Landscape and Visual Impact Assessment (LVIA), prepared by Pegasus Group on behalf of the appellants. Reference is made to the content and findings of these where relevant, supplemented by additional professional judgement as necessary.

Evidence Structure

- 1.13. The evidence is structured as follows, including this introduction (section 1):
- At section 2, I give a brief description of the appeal sites in their context, and the appeal scheme, including an analysis of constraints and opportunities and development potential (based on my own observations and judgement);
 - At section 3, I present a brief background to the appeal, including a summary of the Council's reasons for refusal where these are relevant to landscape and visual matters;
 - At section 4, I address the key issues in the reason for refusal in respect of landscape and visual matters, and present additional analysis of these;
 - At section 5, I address policies relevant to landscape and visual matters; and
 - At section 6, I provide a summary and conclusions.
- 1.14. Principles and good practice for undertaking landscape and visual impact assessment (LVIA) and/or applying the principles of LVIA are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹ (GLVIA3). The concepts and procedures set out in this guidance have been adopted where appropriate.
- 1.15. The professional judgements which are presented in this evidence for this appeal (reference LPA reference P/18/1118/OA and P/19/0460/OA) have been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

2. THE APPEAL SITES

2.1. This section sets out an overview of the appeal sites and their context.

Overview

- 2.2. Together, the appeal sites extend to ca. 10 hectares (ha) of agricultural land, situated close to the urban edge of Fareham and Gosport and within a discreet parcel of land that is bounded by Newgate Lane to the west, Woodcote Lane to the south and Newgate Lane East to the east (with Newgate Lane and Newgate Lane East framing the northern edge of the sites also).
- 2.3. Hambrook Lodge (accessed from the west, off Newgate Lane) Lodge and its curtilage is located between the two sites, but the property (and the access to the property) is not included in the red line boundary for the sites.
- 2.4. The appeal sites are located outside the defined settlement boundary identified in the Local Plan policies map, in a 'Strategic Gap' known as the Fareham/Gosport to Stubbington/Lee on Solent Gap (or simply the Fareham - Stubbington Gap).
- 2.5. They are not subject to specific statutory or non-statutory landscape related planning designations.

Description and Context

- 2.6. The sites are located between Fareham and Gosport, adjacent to the suburbs of Woodcot and Bridgemary which are located to the east and adjacent to Peel Common which is located to the west.
- 2.7. The northern site comprises three enclosures, the largest of which is currently in arable production, the smaller two are in pastoral use. These cover an area that surrounds the northern extent of Hambrook Lodge which itself includes a number of related buildings (some dilapidated) and is generally enclosed by mature vegetation.
- 2.8. The southern site comprises four mixed use agricultural enclosures, the fields to the east are currently in arable production, whilst the field to the west, adjacent to Peel Common and Newgate Lane are in use as pastoral and equestrian paddocks. A small watercourse and drainage ditch bisects the southern site and reinforces the differentiation between the land uses of the eastern and western areas.

- 2.9. Newgate Lane is located immediately to the west of the sites and forms a connection with the southern edge of Fareham and, further south Gosport Road (noting that this is closed to traffic but retains a link for pedestrians and cyclists). Immediately to the east is the route of the new relief road, Newgate Lane East. Newgate Lane East is accessed from Newgate Lane by a T-junction, situated just north of the northern parcel.
- 2.10. The wider landscape context is set within the low-lying ground of the coastal plain landscapes and characterised by abrupt transitions between the open landscapes of the coastal plain and the urban environments which abut these. These urban areas include Fareham, Gosport and Woodcot and Bridgemary to the north and east. The settlement area of Stubbington, a medium scale, predominantly residential area is located to the west. The settlement edge of Stubbington forms the western extent of the Fareham to Stubbington strategic gap. In this context the strategic gap comprises an area of open landscape that extends across the coastal plain between the local settlement areas. Separation is most pronounced across the arable areas between Fareham/Peel Common and Stubbington.

Recent Landscape Change

- 2.11. The LVIA reports submitted in support of the planning applications were prepared and finalised in late 2018. These included reference to the published landscape character study for the Borough (The Fareham Landscape Assessment, 2017) which was prepared by LUC on behalf of Fareham Borough Council (FBC) and forms part of the evidence base to the current Local Plan.
- 2.12. The appeal sites are located in an area defined by the LUC study as 'LCA 8, Woodcot-Alver Valley' (including sub areas 08.1a and 08.2b). In relation to 'LCA 8, Woodcot-Alver Valley', the LUC study acknowledges the emerging proposals of the Fareham bypass (Newgate Lane East) and potential strategic housing development on the edge of Woodcot/Bridgemary (parcel HA2) and the landscape change that these may bring.
- 2.13. Since the publication of the LUC study (and submission of the Pegasus Group LVIA work) the proposals for Newgate Lane East have been constructed and the route has been open to traffic since April 2018; the majority of landscape works were completed in the 2018/19 season.
- 2.14. Although both the LUC study and the assessment of impacts undertaken in the submitted Pegasus Group LVIA make reference to the potential bypass and how it will

influence the local landscape, there is now scope to consider the actual and current baseline situation.

3. BACKGROUND TO THE APPEAL

- 3.1. The background to the proposal is set out in full, in the main Statement of Case, prepared by Pegasus Group on behalf of the appellant. This section provides a brief overview of the background relevant to landscape and visual matters.

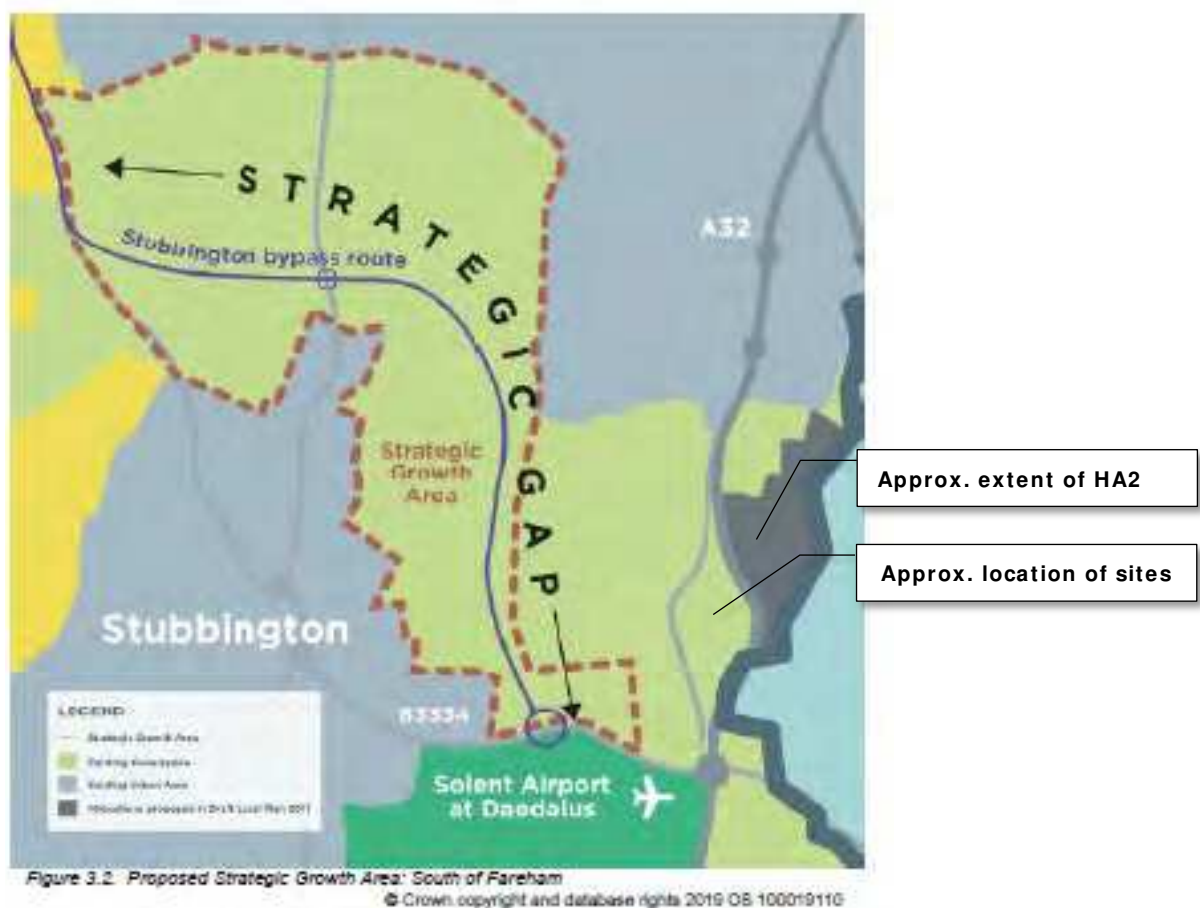
Application

- 3.2. The applications were submitted in September 2018 (north) and April 2019 (south), with each supported by a separate Landscape and Visual Impact Assessment, prepared by Pegasus Group (**CDA.48** and **CDA.106**).
- 3.3. In respect of both appeal sites, landscape and visual matters formed part of an iterative design process that guided the evolution of the masterplans and integration of mitigation measures into the schemes.
- 3.4. For both sites, the submitted LVIA work demonstrated a limited effect on landscape character, whereby impacts are restricted to a local level.
- 3.5. The work also demonstrated that the proposed developments would not detract from the function of the wider strategic gap, both due to the inherent character of the landscape itself, and also due to the physical and visual separation that is present between the sites and the more obvious and open part of the strategic gap between Peel Common and the eastern edge of Stubbington.
- 3.6. For views and visual amenity, the submitted LVIA work also demonstrated that the sites (and proposed developments) would be generally screened by existing development and existing mature vegetation, the influence of both being augmented by the low lying and relatively flat nature of the landform. Prominent views of the sites would only be available from its immediate context along Newgate Lane and Woodcote Lane with the greatest degree of visual effect from locations immediately adjacent to the sites, and from a small number of existing individual residential properties, again, located close to (or adjacent to) the site. Together, and in the balance of landscaped and visual matters overall, these impacts and effects are were not considered significant in landscape and visual terms.
- 3.7. During the process of the application, further design changes have occurred; these either maintain or improve the proposed mitigation which forms an inherent part of the schemes.

Further Landscape and Visual Studies

- 3.8. Since the submission of the planning applications, the LPA has continued with the development and review of the Local Plan.
- 3.9. In previous iterations, notwithstanding the continued adoption of 'Strategic Gap' policies in this part of the Borough, the emerging local plan proposals had identified a 'Strategic Growth Area' situated across the landscape between Stubbington and Fareham, overlapping with a large part of the retained Strategic Gap. This had also indicated the inclusion of a housing allocation (HA2) on the southern edge of Fareham.

Plate 1: Extract from Fareham Draft Local Plan 2036 Supplement



- 3.10. In that previous iteration, the boundary of the Strategic Gap had been drawn to extend up to the settlement edge of Bridgemarky (whilst incorporating the proposed housing allocation of HA2 and the recently constructed New Newgate Lane). In contrast, the Strategic Growth Area had been drawn to an eastern limit up to the existing waste water treatment works and the solar farm that are present to the south-west of the edge of

Fareham, noting that the extent of that boundary would exclude both appeal sites and exclude the emerging HA2 allocation.

- 3.11. Notwithstanding that the Fareham Landscape Assessment (LUC, 2017) forms part of the evidence base for the policy proposals, it was necessary to address the purpose and function of the gap and the proposed area of strategic growth.
- 3.12. In order to address this issue, Pegasus Group undertook a strategic level study of the Fareham-Stubbington Strategic Gap, including the area up to the Gosport boundary (**CDA.54**).
- 3.13. The aim of that study was to identify the core areas of Strategic Gap which were considered more fundamental to the function of the Strategic Gap in terms of preventing coalescence between settlements and maintaining of settlement identities. The study identified 'Priority Areas' that should be maintained as Strategic Gap, with areas outside of these considered further for growth.
- 3.14. The study concluded that areas on the northern and western edges of Stubbington and at Fareham (along Longfield Avenue and between Peel Common and Woodcot/Bridgemary) can accommodate growth and that development in these areas would not fundamentally undermine the physical separation, nor the sense of separation between Stubbington and Fareham.
- 3.15. During the course of the appeal FBC continued to progress their Local Plan. The evidence base to the latest draft Local Plan 2036 included a 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' (2020) undertaken by Hampshire County Council on behalf of FBC (**CDG.7**). The content and findings of this study are considered later in my evidence.

Consultation Responses

- 3.16. A summary of the main relevant consultation responses to the application are set out in the following section.

Urban Design, Fareham Borough Council

- 3.17. The response from FBC on landscape and visual matters was prepared by the Urban Design officer (4th February 2019) (**CDB.5a**). These comments were limited to the northern site and broadly suggested that the proposed development would have an

‘unacceptable negative impact upon the integrity of the existing open, predominantly rural agricultural character’, of the landscape’.

- 3.18. However, it was felt that the conclusions of the consultation response did not sufficiently consider the (then) emerging baseline of Newgate Lane East and potential strategic development site (HA2), consequently the response overemphasised the degree of impact arising from the scheme.
- 3.19. In this context Pegasus Group prepared a comprehensive response to address the points raised (refer to **CDA.41**).
- 3.20. In a separate, later, response, the Urban Design officer requested that the layout be reworked to make a 'less formal block structure' (**CDB.5b**). These comments were addressed in revisions to the LVIA and ILMP, which were resubmitted as LVIA Rev D (**CDA.48**).

Principal Tree Officer, Fareham Borough Council

- 3.21. No objection is raised in response to trees, with the tree officer noting that 'the illustrative masterplan shows the developable area with the majority of the existing field boundary trees and hedges retained and incorporated into public green space' and concluding that 'the principle of development within the area shown is broadly acceptable in arboricultural terms'.

Gosport Borough Council

- 3.22. Gosport Borough Council (GBC) have objected to the applications, noting issues of the strategic gap and green infrastructure.
- 3.23. In relation to the first point, GBC suggest that the 'scale and location will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.
- 3.24. GBC go on to suggest that the sites would diminish the opportunities to make the 'optimum use' of green infrastructure, and particularly in providing green linkages from Fareham to the coast via the Alver Valley Country Park.

Natural England

- 3.25. The response from Natural England refers to green infrastructure provision, noting that the development is within an area that could benefit from enhanced green infrastructure provision.
- 3.26. In relation to landscape, the Natural England response notes that the proposal does not appear to be within, or within the setting of, any nationally designated landscape but also notes that proposals should complement, and where possible enhance, local distinctiveness, as guided by relevant landscape character assessment for the Borough.

Environment Agency

- 3.27. Further design changes to the masterplan were implemented in response to consultation comments from the Environment Agency and their provision of up to date flood map data.
- 3.28. This resulted in amendments to the southern appeal site and removal of a parcel of proposed development from an area to the west of the watercourse.
- 3.29. An LVIA addendum (**CDA.119**) was prepared that addressed the minor design change, along with the iteration of the Illustrative Landscape Masterplan.

Officers Reports to Committee

- 3.30. Appeals against the non-determination of the applications were submitted to the Planning Inspectorate, and the Council were notified in June 2020 as to the validity of these.
- 3.31. A report was prepared for Members which confirmed the position of the Council in respect of the case that would be presented at a forthcoming appeal, and inviting Members to confirm the decision that they would have made, had they been able to determine the planning application.
- 3.32. In both instances (north and south sites) the reports confirm that they would have refused the application.
- 3.33. The reports to committee set out a brief summary of the consultation responses received under several sub-headings (**CDC.1** and **CDC.2**). Those relevant to landscape and visual matters are summarised as follows:

Principle/location/policy issues

- Located in strategic gap;
- Loss of countryside;
- Impact on character of the 'new' Newgate Lane and the 'old' Newgate Lane;
- Impact on "green belt" (notwithstanding that the site is not in fact in an area defined as green belt);
- The site is not 'well integrated' contrary to policy DSP40;
- Loss of green land and linkages; and
- Impact on landscape.

Strategic Gap

- Impact on the strategic gap;
- Coalescence of Fareham and Gosport;
- The proposed development will not strengthen the strategic gap; and
- Development in the strategic gap will set a precedent for further development.

Environment

- Loss of green/open space and loss of agricultural land; and
- Impact on ability to make optimum use of green infrastructure, including providing green linkages from Fareham to the coast.

3.34. The report includes reference to a petition entitled 'Stop building in the Fareham/Gosport Strategic Gap' that was published in August 2020 and refers to several points in respect of landscape and visual matters and the strategic gap.

3.35. The main issues raised in respect of landscape and visual matters are set in the context of Local Plan Policy DSP 40 (paragraphs 8.32 to 8.61 of the North committee report and 8.31 to 8.6 of the South committee report).

3.36. The applications were subsequently refused (24th June 2020) (**CDC.4**) with the reasons for refusal as listed in the reports to committee. The overarching reason for refusal state that:

3.37. *"The development is contrary to Policies CS2, CS4, CS5, CS6, CS14, CS15, CS16, CS17 and CS22 of the Adopted Fareham Borough Core Strategy 2011 and Policies DSP6, DSP13 & DSP40 of the Adopted Local Plan Part 2: Development Site and Policies Plan, paragraphs 103, 109 and 110 of the NPPF and is unacceptable in that:*

- 3.38. For the southern site this is identical, save for the omission of reference to Policy CS16.
- 3.39. *"The development is contrary to Policies CS2, CS4, CS5, CS6, CS14, CS15, CS17 and CS22 of the Adopted Fareham Borough Core Strategy 2011 and Policies DSP6, DSP13 & DSP40 of the Adopted Local Plan Part 2: Development Site and Policies Plan, paragraphs 103, 109 and 110 of the NPPF and is unacceptable..."*
- 3.40. More specific reference to landscape and visual matters is made in the following reasons for refusal (noting that these are repeated for both the north and south sites):

- b) The proposed development fails to respond positively to and be respectful of the key characteristics of the area and would be harmful to the character and appearance of the countryside;*
- c) The provision of development in this location would significantly affect the integrity of the strategic gap and the physical and visual separation of settlements;*
- d) The application site is not sustainably located adjacent to, well related to or well-integrated with the existing urban settlement boundaries;*

- 3.41. On review of the consultation responses, reports to committee and relevant reasons for refusal, several common themes are apparent in respect of landscape and visual matters. These are summarised as follows:
- Issue 1A: What are the key characteristics of the site and its immediate context and how have the schemes responded to these in terms of mitigation?
 - Issue 1B: The degree of impact on the key characteristics of the site and its immediate context and the extent to which these can be considered as harmful.
- 3.42. These matters are effectively addressed in the submitted landscape and visual impact assessments which set out a comprehensive baseline for the site and the local landscape context, including an assessment of the impact and approach to mitigation. I will return to these documents in later sections of my evidence.
- Issue 2: The purpose and function of the strategic gap in terms of providing physical and visual separation between settlements and how the site functions in relation to the wider gap.

- 3.43. During the course of the application a 'strategic landscape and visual appraisal' of the strategic gap was prepared to identify the role and function of the strategic gap, variations therein, the core areas and also how the strategic gap could be maintained whilst accommodating the strategic growth in the area. I will return to the gap study in later sections of my evidence.
- Issue 3: The context of the application sites in relation to the existing urban settlement edges/boundaries.
- 3.44. This issue is also touched upon in the submitted landscape and visual impact assessments in terms of the local landscape context to the appeal sites. I will return to the relevant findings of the LVIA reports in later sections of my evidence.
- 3.45. I consider these issues in the following sections, along with the different parts of the reason for refusal, thereafter drawing my conclusions.

4. ANALYSIS OF LANDSCAPE AND VISUAL MATTERS

- 4.1. In this section I set out an analysis of landscape and visual matters. I have presented the analysis under the broad topics raised in the reason for refusal, with reference to the key issues identified in the previous section of my evidence.

Reason for refusal b) The proposed development fails to respond positively to and be respectful of the key characteristics of the area and would be harmful to the character and appearance of the countryside.

Landscape character and key characteristics

- 4.2. The reasons for refusal suggest that the proposed development fails to respond positively to, and be respectful of, the key characteristics of the area. In this section I set out the key characteristics relevant to the local landscape character, including reference to published guidance, but also with reference to recent landscape change that has resulted from the relatively recent completion of the new bypass, Newgate Lane East.
- 4.3. Landscape character for the area is defined by the 'Fareham Landscape Assessment', with the sites being located in the 'Woodcot/Alver Valley landscape character area, sub areas 08.1a for the northern site, and 08.1 and a small part of 08.1b for the southern site (relevant extracts are included in **Appendix FL&BH 1.2.1**). Peel Common, along with adjacent residential areas and remnant parts of the landscape up to the edge of Gosport, are also included in the same LCA; by contrast, the landscape between Fareham and Stubbington (including the wastewater treatment plant and solar farms) are located within the adjacent area of LCA 7, the Fareham/Stubbington Gap. There is a clear difference in the character between these areas that is based on the scale and pattern of the landscape, land use, enclosure landscape, and the degree of influence of the settlement edge along with urbanising influences.
- 4.4. The key characteristics of the relevant LCAs are considered in the baseline of the submitted LVIA (para 4.34, **CDA.48 and CDA.106**) and consequently informed the analysis, constraints and opportunities, and ultimately the landscape strategy for the mitigation that is included as an integrated part of the two masterplans for northern and southern schemes.
- 4.5. Greenfield development retains an inherent impact on the physical landscape, but it is possible to bring development forward in a positive manner that addresses landscape and visual constraints. The appeal schemes do so. Where this positive approach is

adopted, the perception of those physical impacts in terms of landscape character are also minimised, also something that the schemes achieve.

- 4.6. In respect of the key characteristics the Fareham Landscape Assessment (FLA) notes that 'key characteristics aim to improve understanding of the how places are distinctive and different from one another, rather than being an appraisal for areas that are 'better or worse'. It is the second and third sections of the FLA that address Landscape Sensitivity and the designations review that address matters of value, sensitivity and designations.
- 4.7. Key characteristics are defined in the 'Landscape Character Assessment' section of the FLA. For the Woodcot/Alver Valley (LCA8) the FLA notes that (FLA, page 62):
- 4.8. *"The Alver Valley also forms part of the strategic gap separating Fareham and Gosport but it is very different in character and scale from the open farmed landscape to the west. It comprises a mixed pattern of wooded common, small-scale pasture and ribbon development along the corridors of the River Alver and Newgate Lane and is bounded to the east by the urban edge of Gosport and to the north by the outskirts of Fareham."*
- 4.9. This sets out a clear distinction between the landscape context of the site, and the wider strategic gap area to the west and north-west, between Fareham and Stubbington. The description of the LCA also establishes the influence of the urban fringe; from the edge of Gosport, edge of Fareham, but also from ribbon development in the LCA (as reflected by the character of Peel Common). These influences should be considered in the appraisal of the appeal sites in the context of the local landscape.
- 4.10. The LCA defines several 'essential characteristics'. These are set out in the following table, set against a brief description as to how the appeal schemes would influence these or has responded to these.

Table 1: Summary of essential characteristics of the Woodcot/ Alver Valley and anticipated change

Essential characteristics of the Woodcot/ Alver Valley	Influence on landscape and design response
A mosaic of small and medium scale fields at Woodcot, forming a mixture of small horse-grazed pasture and larger arable fields divided by fences, ditches and gappy hedgerows;	<p>The scale and pattern of fields contribute to a more enclosed landscape.</p> <p>Grazed pasture, equestrian uses are not always positive aspects of the landscape and can be seen as detracting components of a landscape, driving needs for enhancement.</p> <p>Development and landscape strategy generally works within the scale of the existing field pattern aiming to</p>

	<p>limit overall 'massing' by working within the existing enclosures.</p> <p>This has an added benefit that vegetation is retained and subsequently enhanced through programmes of supplementary planting and longer term management.</p> <p>As part of the overall green infrastructure strategy for the appeal schemes, the sites can provide additional and reinforcement planting to hedgerows with additional tree planting also.</p>
Although this area forms the upper part of the Alver Valley it lacks a distinct valley character;	<p>A 'valley' landform is not pronounced here, reinforcing that this part of the landscape is a transition between the more distinct valley to the south-east and the flatter, slightly undulating plain to the west.</p> <p>This reinforces the nature of boundaries between character areas that they are rarely fixed along a defined alignment and instead tend to form a 'merging' or transition.</p>
The hedgerow pattern is gradually replaced by scrubby woodland to the south, enclosing Chark Common and the golf course;	<p>The hedgerow network is a stronger characteristic of the appeal sites and their context, with this network forming much of the green infrastructure framework.</p> <p>Newgate Lane East has impacted on the network to a degree, severing the hedgerows and field patterns in some parts of the landscape, particularly in proximity to the eastern edge of the appeal sites.</p> <p>The appeal schemes incorporate the hedgerow network as part of the overall masterplan, using this landscape component to guide the scale and form of the development envelope. There are likely to be some limited losses in parts of the appeal sites but retention, management and additional planting can mitigate these losses.</p>
The character is influenced by the busy road corridor and the urban characteristics of Peel Common and Solent Enterprise Zone at HMS Daedalus on one side and the urban edge of Bridgemary on the other.	<p>In the local landscape context of the appeal sites, urban influences and the settlement fringes are generally a prominent feature and, given the appeal sites and the surrounding undeveloped landscape areas do not exist in isolation, these urban edges do have an influence on the local landscape character.</p> <p>Newgate Lane East and its associated infrastructure (including prominent acoustic fencing, road junctions and crossings) have further influenced local landscape character, drawing the urban influence into the landscape between Peel Common and Gosport (at Bridgemary).</p> <p>The acknowledged landscape impact largely relates to the introduction of residential development into the appeal sites. However this will be congruent with the settlement pattern of Peel Common due to the placement and relationship between the appeal sites to Peel Common (along Newgate Lane) and the contained to the east and north by the alignment of Newgate Lane East.</p> <p>There also remains the existing connection between Peel Common and the edge of Gosport at Bridgemary, whereby the settlement pattern is connected by</p>

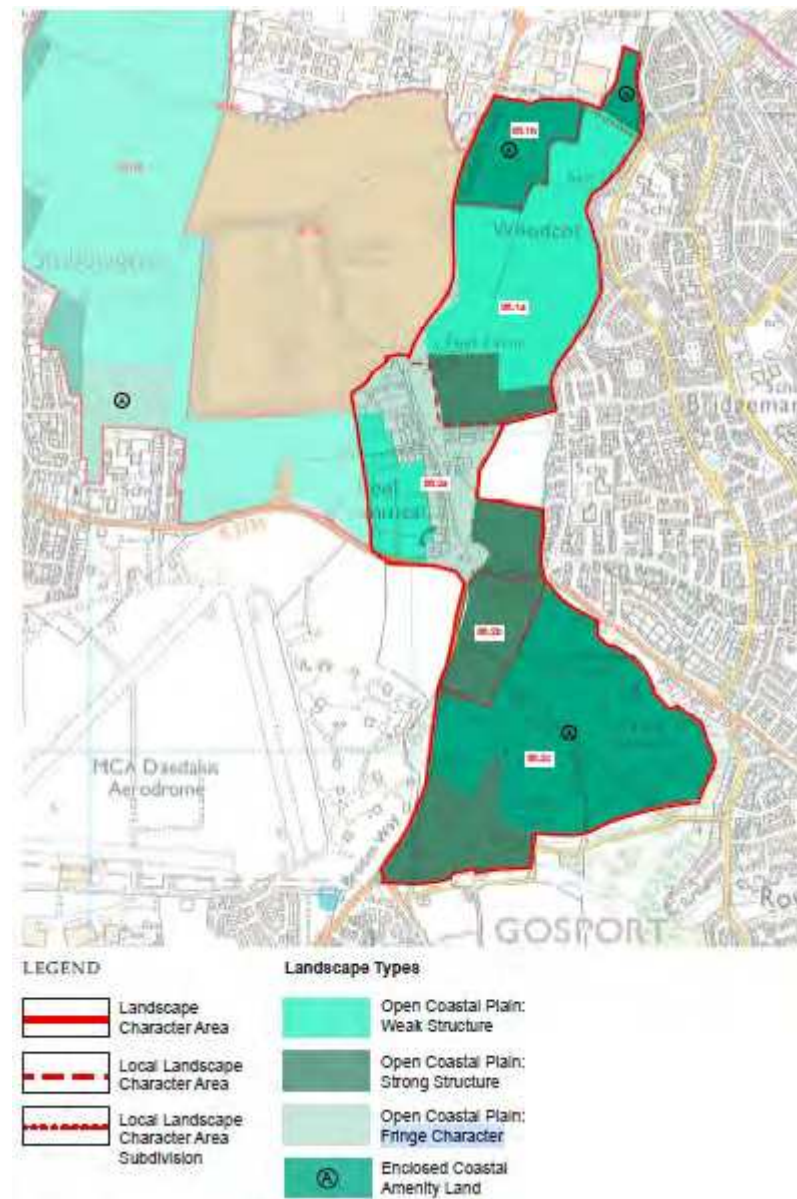
	existing properties along Woodcote Lane and the amenity land use of Brookers Field Recreation Ground (which is suburban in its character and contrasts to the agricultural land uses).
--	--

- 4.11. Overall, I consider the approach taken to the design of the respective masterplans to have adopted a positive approach in landscape and visual terms. The loss of the agricultural enclosures and replacement of these areas with residential development is largely the main cause of impact, however this is balanced by the response to the grain and pattern of the landscape and its scale, as well as the response to the characteristics of the landscape, several of which are defined as 'essential' by the published guidance. Where these are referenced, mitigation adopts an approach of retention and/or enhancement. Further details are described in the following sections.
- 4.12. In relation to the scale of the field patterns (and scale of the landscape), this has been used to guide the scale and pattern of the development areas on site. Field boundaries and parcels of development have been formed within the field patterns and their boundaries consequently breaking down the massing of proposed development. Notwithstanding the change in land use from agricultural fields to residential development, this approach to mitigation does draw on and reflect the key characteristics. Furthermore, the scale of development is consistent with the types of existing residential area that are present in the surrounding context, the appeal sites being subservient to the stronger and larger scale residential edges of Fareham and Gosport and also being compatible with the adjacent settlement area of Peel Common.
- 4.13. In respect of the landform, the proposed development will not unduly influence this characteristic; a characteristic which is not necessarily distinctive in any respect. The landform of the site in its context is not reflective of the broader Alver Valley and, I consider, shows part of a transitional area of topography that emerges from the valley and up toward the undulating plain to the north-west. Man made features such as the earth banks around the waste water treatment works are also a feature in the local landscape, maintaining a distinction between the landscape to the west and east of Peel Common.
- 4.14. As with the scale of the landscape, the proposed development has intentionally incorporated the field boundary hedgerows into the layout as far as possible, retaining the existing framework of vegetation. Notwithstanding that this will be set in the framework of a residential development and its open spaces, the hedgerow field pattern is retained, whereas elsewhere in the LCA (such as the golf courses) it would appear to have been eroded). Disruption to the hedgerow network is also apparent as a

consequence of the new bypass, Newgate Lane East, which has severed several of the local field patterns and hedgerows; the replacement of these with highways green infrastructure is acknowledged, but this does not respond to the pattern of the landscape in this locality. Vegetation and hedgerows retained within the layout are proposed to be augmented with new additional planting, supplemented by added diversity and landscape management, and where lost the additional planning will replace these.

- 4.15. In relation to urban influences, the landscape impact of introducing residential development into the site is acknowledged, and the impacts are clearly set out in the submitted LVIA. However in response to landscape character, and the existing influences of the urban edge that are noted in the FLA, the site has responded by avoiding and minimising this influence. This includes the provision of 'buffers' to form an offset to the edge of the proposed development and the adjacent landscape context. This will also help to create a partial screen, presenting a scheme that is not entirely defensive in terms of how it integrates with the adjacent landscape, but instead adopts a more positive approach of presenting a 'fair face' and more attractive, softer settlement edge.
- 4.16. More detail on landscape character is set out in section 2 of the FLA, relating to local landscape character areas and the sensitivity assessment. This divides LCA8 into five sub-areas, with areas 08.1a, 08.1b and 08.2a most relevant to the sites given they sit adjacent to each other and include the site. 08.2b and 08.2c provide some context to the local landscape but sit further afield and are slightly separate from the site context.

Plate 2: FLA extract (page 151) showing landscape types for LCA8



- 4.17. The structure of the landscape of 08.1a and 08.2a is defined predominantly as 'weak structure' or 'fringe character' with just a small part of 08.1a that is defined as 'strong structure' which is concurrent with parts of the southern site (refer to **Plate 2**).
- 4.18. In relation to the appeal sites, I agree with the definition of the structure as broadly 'weak' or 'fringe' character. This is because it is reflective of the various suburban influences that are prominent in this part of the landscape and contribute to the suburban continuity in the landscape that draws Peel Common, Bridgeman, Woodcot and the edge of Fareham together. Physical influences include the prominent residential edges of Gosport and Fareham, cycleway connections and the alignment of Newgate

Lane East (and substantial pieces of highways infrastructure that accompany this), but also the pocket of amenity land use situated to the north and south of these areas.

4.19. The more detailed sections of the LCA do not set out 'key characteristics' (over and above the 'essential characteristics' defined for the wider LCA) but instead include a more detailed descriptions (refer to **Appendix FL&BH 1.2.1**). These are presented for each sub-area in relation to:

- the landscape resource (landscape character and quality);
- the visual environment (views, visual features and viewers);
- setting of the urban area (contribution to setting and settlement character); and
- green infrastructure (contribution to green infrastructure).

4.20. Each also includes descriptions of sensitivity and development potential.

4.21. The descriptions are extensive, but a summary is presented in the format of addressing 'development criteria and enhancement opportunities'. This section states that the area is of 'high sensitivity' and refers to matters of coalescence and it's 'generally unspoilt rural character'.

4.22. In itself this is a characteristic, but this part of the landscape does not exist in isolation, nor is it experienced in isolation and the sense of the rural character is equally influenced by the settlement fringe and amenity land uses that are presented by the residential areas and nearby sports and playing fields.

4.23. Furthermore, the FLA goes on to state that:

4.24. *"The situation is further complicated by the proposed new road which will have some effect on the integrity and character of the landscape resource and undeveloped gap."*

4.25. Newgate Lane East is now constructed and in use. The route includes additional road junctions as well as some prominent fencing along the route, visible from the road but also from the local rights of way and settlement fringes. I consider the road has effectively severed this part of the landscape, and provided a very urbanised corridor that connects previously suburban fringes, linking as it does such features as the urban edge of Fareham (with the solar installation and sports facilities also on this edge), the waste water treatment works, Peel Common itself and the amenity landscapes of Brookers Field recreation ground.

- 4.26. Consequently, this part of the landscape is no longer representative of the 'unspoilt' landscape described in the 2017 LA, nor does it fulfil its role of preventing coalescence between these edges of the settlement.
- 4.27. The FLA does acknowledge that, in relation to sub-area 8.2 there is some potential for development, stating that (page 167):
- 4.28. *"The only opportunities may lie within areas that are closely associated with existing development (e.g. at Peel Common or in the SW corner of area 8.2c) and can be integrated within the landscape without any physical or perceived encroachment within the gap."*
- 4.29. This part of the landscape does (and will), however, remain distinct from the wider strategic gap between Fareham and Stubbington which, in landscape character terms, is a clearly distinct part of the landscape from the suburban fringes of Fareham and Peel Common.
- 4.30. Turning back to the reason for refusal in respect of the key characteristics of the landscape, there are several development criteria and enhancement opportunities defined by the FLA which the proposed developments positively respond to. The relevant issues are set out in the following table, accompanied by a brief response as to how/why the proposed development responds positively. Although the two appeal schemes are separate applications, I include a plan of a composite landscape strategy that illustrates how the landscape strategy forms a comprehensive and connected mitigation strategy (refer to **Appendix FL&BH 1.2.2**).

Table 2: Summary of LCA8 sub-area development criteria/ enhancement opportunity and design response of the appeal schemes

Relevant FLA development criteria and enhancement opportunity	Proposed development design response
Sub area 8.1 Woodcot	
Maintain and strengthen the existing structure of trees, hedgerows and other mature vegetation, to maximise its landscape and wildlife value and to minimise impacts on the rural character of the landscape	<p>The appeal schemes reference the scale and pattern of the landscape by placing a limit on the development envelope for built form and retaining hedgerow (and other) vegetation as far as possible. Losses will be mitigated by additional planting.</p> <p>The landscape strategy includes for a diverse range of tree, hedgerow and grassland areas, contributing to biodiversity potential.</p> <p>Being contained between Peel Common and Newgate Lane East, other than the 'on site' impact, impacts on the 'rural character' will be contained and limited.</p>

Maintain the essentially open, undeveloped character of the public open space, playing fields and sports facilities within area 8.1b, and be designed to relate closely to the existing structure of trees hedgerows and existing characteristic built features within the area	Brookers Field Recreation ground is located immediately to the south-east of the appeal sites with additional playing fields and formal play areas located on the edge of Fareham to the north of the appeal sites. Notwithstanding the connections to these areas by the settlement pattern and roads/footpaths, the appeal schemes are physically contained and will not influence the openness of these areas.
Avoid any major incursion of the urban area into the countryside beyond existing well defined boundaries, or create significant new pockets of urban or urbanising development within open farmland	The presence of the solar farm, waste water treatment works and Peel Common itself all form a physical and perceptual barrier to the west; these are further reinforced for much of the western edge by various tree and woodland cover. To the east, Newgate Lane East has severed the agricultural landscape and now broadly forms an eastern limit to the appeal schemes, however there remains a perception and some physical connection to Bridgemary. Overall this does not represent a 'major incursion' into the countryside as in either respect, the appeal schemes will form an appropriate fit with the existing settlement patterns.
Protect the area's role in maintaining the separation of settlements and a clear distinction between urban and rural areas. In particular, avoid ribbon development strung out along road corridors (e.g. along the existing and proposed new alignment of Newgate Lane) and any development beyond the existing urban edge that cannot be successfully integrated within the existing landscape structure and which could affect the visual, physical or perceived integrity of the strategic gap	As noted, Peel Common and its immediate environs form a distinct edge to the settlement pattern associated with the edge of Fareham and Gosport. The appeal schemes will not breach this and will not have an impact on the overall strategic gap to the edge of Stubbington. In terms of ribbon development, together the appeal schemes will present an area of development that dovetails with the existing settlement pattern of Peel Common which in itself is partly comprised of ribbon development along Newgate Lane. The appeal schemes will alter this and consolidate the settlement pattern of Peel Common as a small core settlement area within the broader strategic gap (much in the way that Titchfield, to the north, exists between Titchfield Common and Fareham).
Maintain significant distance and separation from the corridor of the new road to minimise its urbanising effects upon the rural character of the area	The appeal schemes include a landscape buffer along their eastern edge which will integrate with the linear landscape proposals that have been implemented to mitigate the urbanising influence of the new road.
Avoid the introduction of tall buildings or structures that would be particularly visually prominent within the open, flat landscape	The appeal sites are physically well contained by the combination of existing built form and green infrastructure and consequently it is not considered that residential development on the appeal sites will be particularly visible or prominent.
Protect and enhance enjoyment of the landscape by maintaining and enhancing the existing areas of public open space and access network, and by making further provision for accessible greenspace and access links within and across the area	The appeal schemes will not unduly affect any of the open spaces in the area, nor are they prominent or visible from the open spaces or prominent from the local PROW network. Furthermore, green infrastructure and open space is included on the western edges of the appeal sites which makes further provision for accessible green space and green links.

Provide substantial new investment in the landscape through extensive tree, hedgerow and woodland planting using native broadleaved species appropriate to the locality and soil conditions and habitat creation to diversify the intensively farmed landscape	The appeal schemes include for a range of landscape and habitat types as part of the landscape strategy. Use of native and locally prevalent species would be an inherent part of the proposals and this element of detailed design can be controlled by condition.
Demonstrate design that has minimal impact on the surrounding landscape and is in keeping with the character of the local landscape context	The detailed LVIA, along with additional analysis in this evidence, illustrates that mitigation measures will be successful in minimising impacts in respect of both landscape and visual matters.
Sub-area 8.2 – Peel Common and Alver Valley	
Safeguard the area's vital role in maintaining the separation of settlements and a clear distinction between urban and rural areas. In particular, avoid ribbon development along road corridors (e.g. Broom Way, Shoot Lane and Gosport Road) and any development beyond the existing urban edge that cannot be successfully integrated within the existing landscape structure and which could affect the visual, physical or perceived integrity of the strategic gap;	The appeal schemes will consolidate the settlement pattern of Peel Common and can be integrated into the landscape with very limited influence on the adjacent landscape areas, particularly due to the considerable degree of enclosure from existing green infrastructure. The integrity of the overall strategic gap will be retained; where this is narrowed between
Maintain the distinctly 'isolated' nature of settlement at Peel Common and ensure that any potential small-scale infill development within this area effectively 'rounds off' rather than extends the settlement boundary, to avoid the risk of physical or perceived coalescence with other built areas;	The appeal schemes will consolidate the settlement of Peel Common being limited as they are by the alignment of Newgate Lane East. The appeal sites represent an opportunity to round off this edge of the settlement, up to the existing junction, without overly diminishing the remaining countryside to the east of Newgate Lane East. Further south, the perception of separation between the existing edges of Peel Common and Bridgemary is already limited due to the presence of residential development along Woodcote Lane and also the amenity character of Brookers Field Recreation Ground which influences character at a local level.
Protect the semi-rural, undeveloped character of areas 8.2b and c;	The appeal sites are separated and distinct from these areas due to distance and the alignment of the Gosport Road.
Maintain and strengthen the existing structure of woodland, trees, hedgerows and other mature vegetation in all parts of the area, to maximise its landscape and wildlife value;	As previously noted, the comprehensive landscape strategy would deliver this.
In particular, maintain and enhance the mosaic of woodland, heathland, grassland and wetland habitats of value within the Lee-on-the-Solent golf course at Chark Common and	As previously noted, the comprehensive landscape strategy would deliver this – the strategy includes for diversity of habitats and landscape components.

encourage further habitat creation and diversification within intensively managed areas to maximise wildlife and landscape value;	
Avoid the introduction of tall buildings or structures that would be particularly visually prominent within the landscape;	As noted, the appeal schemes will not be unduly prominent in the landscape and are both physically and visually well contained.
Protect and enhance enjoyment of the landscape by maintaining and enhancing the existing areas of public open space and access network, and by making further provision for accessible greenspace and access links within and across the area, particularly along the River Alver corridor and with the Country Park to the south;	The appeal schemes include areas of green infrastructure and open space which will make a positive contribution to the network of green infrastructure in the area. Connections to the River Alver corridor and Country Park will not be impacted.
Demonstrate design that has minimal impact on the surrounding landscape and is in keeping with the character of the local landscape context.	As noted, the detailed LVIA, along with additional analysis in this evidence, illustrates that mitigation measures will be successful in minimising impacts in respect of both landscape and visual matters.
Use native broadleaved species appropriate to the locality and soil conditions in new tree and hedgerow planting.	Also as noted, the use of native and locally prevalent species would be an inherent part of the proposals and this element of detailed design can be controlled by condition.

Interim summary on landscape character

4.31. In this section so far, I have considered the first part of the reason for refusal (b), namely that the proposed development fails to respond positively to and be respectful of the key characteristics. This includes:

- A description of the characteristics with reference to the published guidance, reiterating that this baseline position was fully considered and acknowledged in the submitted LVIA;
- That there is a distinction in landscape character between this area (the site and its context) and the wider part of the strategic gap between Fareham and Stubbington;
- That the published baseline makes clear reference to the suburban nature and influences in this part of the landscape and that it gives give some context to the scope for potential development in this area;
- That this baseline is slightly out of date by virtue of Newgate Lane East, which is now constructed and in operation;
- Having set out this baseline position on the key characteristics, I have also described clearly, again reiterating that this was addressed in the submitted LVIA,

how the proposed development responds to these characteristics through the landscape strategy that forms the basis for the proposed development.

- 4.32. The mitigation strategy is largely integrated into the proposed development as a whole, with landscape and visual matters addressed in the layout, extent of developable area, green infrastructure strategy and areas of open space.
- 4.33. In summary, the appeal schemes can clearly demonstrate how they have responded positively to the local landscape character and is respectful of this through the restrictions placed on built form and provision of green infrastructure and open space (with associated landscape proposals) as an integral and positive component of the masterplan for the two appeal sites.
- 4.34. Not only is the landscape strategy consistent with the local landscape character, it also plays an important role in terms of lessening the predicted impacts of the 'built' component of the developments (as does the baseline context of the suburban edges of the settlement).
- 4.35. This leads me to the second part of the reason for refusal (b) where it suggests that the proposed development would be 'harmful' to the character and appearance of the countryside.

Impacts on the character and appearance on the countryside

- 4.36. In respect of landscape and visual matters, it is typical for landscape character to be discussed first, with views/visual receptors and appearance following. However, I will address the visibility and perception of the site (and proposed development) up front as it sets a very useful context in respect of landscape character.
- 4.37. It is important to note that a comprehensive landscape and visual impact assessment was prepared in support of the applications. These present a technical assessment of the baseline scenario, judgements on landscape value, susceptibility and overall landscape sensitivity as well as consideration of visual impacts from a range of visual receptors in the local area.
- 4.38. The technical assessment and professional judgements therein are based on a transparent approach and can be referred to for specific points. Overall, notwithstanding that there is an inevitable landscape impact on the appeal sites and that for locations directly adjacent to or close to the appeal sites might be of a higher significance of

effect, the overall balance of judgments found that, this degree of impact was acceptable and that mitigation had been successful in avoiding or minimising the impact and effect.

4.39. The overall visibility of the appeal sites is defined as follows:

- To the north, the visibility of the appeal sites is restricted to a short section of Newgate Lane and the junction/short section of Newgate Lane East. Views from the more northern section of Newgate Lane, and also the route of the public footpath between Newgate Lane and Woodcot, are generally screened by intervening vegetation and the route of Newgate Lane East;
- To the east, the visibility of the appeal sites is restricted to locations on the very edge of Woodcot and Bridgemary. This is generally restricted to the upper storeys of residential properties situated on the very edge of the settlement, views from ground floor levels and the street scene being generally screened by intervening vegetation. Newgate Lane East is highly visible from the east, large sections of the route being defined by tall acoustic fencing panels. In the future, views from the east of the appeal schemes is likely to be further screened and contained by the highways mitigation planting along Newgate Lane East, which will form a linear belt of green infrastructure in views from this direction;
- To the south, the visibility of the site is limited to a small number of properties located off Woodcote Lane, with filtered views from the road itself. Some views from Newgate Lane East and Newgate Lane will also be available, albeit limited in duration. In the longer term, highways mitigation planting will screen such views; and
- To the west, the visibility of the site is limited to the route of Newgate Lane with views from locations further west (including public footpaths) being screened by various sections of green infrastructure.

4.40. On balance, the potential visibility of the appeal schemes is very restricted and highly localised. Higher sensitivity receptors such as PROW have very few views. Views from receptors across the strategic gap between Stubbington and Peel Common (including PROW) will have no views.

4.41. Views from Bridgemary, although partially available now, are influenced by highways infrastructure of Newgate Lane East and in the longer term will potentially be fully screened by the mitigation planting along that route.

4.42. What remains is a small number of private dwellings in relatively close proximity to the appeal sites and some public vantage points from the local road network that have views

of the proposed developments. Such locations include a short section of Newgate Lane, the passing traffic (and receptors) along Newgate Lane East, and a short section of Woodcote Lane.

- 4.43. I raise the matter of views/visibility in the first instance, not just to demonstrate how limited the potential views and visual impacts are in their extent, but also to demonstrate that any perception of the change to landscape character is equally limited. In turn, this influences the extent to which any impact could be judged as 'harmful' to the character and appearance of the landscape.
- 4.44. In respect of character and appearance of the landscape, the limited 'scale of change' is just one consideration in the balance of judgement, other matters that are accounted for in the LVIA process include the nature of change. In this case, the appeal sites are not located in a landscape context where residential development, or other urbanising influences, are absent.
- 4.45. The settlement edges at Bridgemary and Fareham are prominent and influential on the local character; the appeal sites sit adjacent to Peel Common and the appeal schemes will complement this settlement pattern, particularly given its containment by the route of Newgate Lane East. Amenity landscapes are present in the form of Brookers Field Recreation Ground and the open spaces and sports fields to the north of the appeal sites.
- 4.46. The agricultural components of the landscape are noted and included in the consideration of landscape impacts, however the peri-urban influences described above are also a relevant part of the baseline consideration against which impacts are judged.
- 4.47. Impacts are also judged on the basis of avoiding or minimising the type and extent of any impact and the positive design approach, reflective of the local landscape context, is successful in avoiding and reducing such impacts. Previous sections of my evidence have clearly demonstrated the positive approach to mitigation.
- 4.48. Overall, an inevitable impact on the landscape will be generated, largely due to the loss of agricultural land to built development. This is addressed by the LVIA which, in reference to the relevant character area of the 'Woodcot/Alver Valley LLCA - Sub area 08.1a' concluded that the magnitude of impact within the study area will be medium which, assessed alongside the low to medium sensitivity, would result in a minor to moderate adverse effect.

- 4.49. In terms of landscape and visual impact assessment, this is at the lower end of the scale for the assessment of significance (which general range across a scale of negligible, minor, moderate and major). At this level of significance, at the lower end of the threshold, these impacts are considered to be acceptable in landscape terms and do not constitute an overall 'harm' to the landscape.

c) The provision of development in this location would significantly affect the integrity of the strategic gap and the physical and visual separation of settlements;

- 4.50. In this section I consider the purpose and function of the strategic gap in terms of providing physical and visual separation between settlements and how the site functions in relation to the wider gap.
- 4.51. During the course of the application a 'strategic landscape and visual appraisal' of the gap was prepared and submitted and this addresses issues in respect of function of the gap, core areas and how the strategic gap can be maintained whilst accommodating the strategic growth in the area.
- 4.52. The overarching aim was to establish which areas of the gap were a priority to maintain its function and separation between settlements, and which parts of the gap could, subject to further detailed assessment, accommodate some form of built development that would be integrated, not highly visible and ensuring that it would not erode the physical, visual and perceived gap.
- 4.53. Albeit undertaken at a high level, the study found that the appeal sites (and landscape generally between Peel Common and Fareham/Gosport) were not a priority area required to maintain the integrity and function of the wider Fareham to Stubbington Strategic Gap.
- 4.54. In September 2020, in support of the emerging Local Plan, the evidence base was updated to include a recent study of strategic gaps across the Borough.
- 4.55. This document, a 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' was undertaken by Hampshire County Council on behalf of FBC and published in September 2020 (**CDG.7**). The study undertook a technical review of the six proposed 'Areas of Special Landscape Quality' and two proposed strategic countryside gaps (including the Meon Gap and the Fareham and Stubbington Gap).
- 4.56. The study reiterates the Fareham Draft Local Plan 2036, stating that (page 5, **CDG.7**):

- 4.57. *"...Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities (page 27, Fareham Draft Local Plan 2036)"*
- 4.58. Study states that the approach and methodology established a set of criteria for determining strategic gap characteristics and boundaries
- 4.59. The executive summary makes two observations in respect of the Fareham to Stubbington Strategic Gap, stating that (following extracts from pages 6 and 7 of the study, **CDG.7**):

"The Fareham-Stubbington Strategic Gap is proposed for continued designation, also having strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence through continued and heavy pressure for Southern expansion of Fareham and Northern and Eastern expansion of Stubbington, but it is considered that there are some opportunities for development to be accommodated within the landscape, without compromising the Strategic Gaps function..."

Possible adjustments to the Fareham-Stubbington Strategic Gap could be considered in the following locations:

- An area to the South of Fareham, and west of HMS Collingwood, as some development in this area could be visually absorbed into the Gap without compromising the Gap function...*

It is also noted that the Newgate Lane Area (Newgate Lane West and East from Fareham to Peel Common Roundabout) has undergone a significant amount of change in the recent past."

- 4.60. The study goes on to 'test' a series of areas against defined criteria, including primary and secondary measures (described on page 19 of the study, **CDG.7**). These are summarised in the following table.

Table 3: Summary of primary and secondary measures for strategic gap criteria

Principles of primary measures	Principles of secondary measures
<i>Physical and visual separation:</i> - absence of urban land uses	<i>Green infrastructure provision:</i> - role and purpose of green infrastructure

<ul style="list-style-type: none"> - primarily an absence of residential development - feeling relatively tranquil - have dark night skies - retain a sense of leaving a settlement, passing through a distinct tract of countryside before entering another - maximum and minimum distances are a 'rule of thumb' 	<ul style="list-style-type: none"> - influence appropriate gap distances
---	---

- 4.61. Further detail of these measures is set out in the detailed methodology to the study. Also in relation to the approach and methodology of the study, it notes that (page 20, para 45, **CDG.7**):
- 4.62. *"Whilst it has been stated earlier that Strategic Gaps, do not necessarily have an intrinsic landscape value, landscape character and it's quality does have a role to play in helping to understand and determine the extent of a gap and it's sensitivity to development..."*
- 4.63. Chapter 4 of the study sets out an overview of the Strategic Gaps, it states that (page 84, para 8, **CDG.7**):
- 4.64. *"The aim of the Fareham-Stubbington Gap is to avoid coalescence between the settlements of: Fareham and Bridgemary, with Stubbington and Lee-on-the-Solent."*
- 4.65. The study goes on to define a series of 'key features' within the Fareham to Stubbington Gap (page 96, **CDG.7**). I summarise these in the following table, along with a brief analysis as to whether these key features are reflected by the appeal sites and their immediate context.

Table 4: Summary of the defined 'Fareham-Stubbington Gap' key characteristics

Key feature as defined by the study	Relevance to the appeal sites and context
Open, predominantly arable farmland and horticulture with some glasshouses, a weak hedgerow structure and few trees	This is reflective of the core part of the gap, whereas the appeal sites are contained within a smaller scale arable landscape contained by a strong framework of hedgerows and hedgerow tree. This distinction is acknowledged by the defined landscape character guidance. Consequently, given the fundamental difference in landscape character here, the appeal schemes will not unduly influence this particular key feature.
The settlement edges are for the most part well screened by mature tree canopy, but there is some	The landscape context to the appeal sites also include the settlement edge of Gosport at Bridgemary, which is also visually apparent from the local landscape. Closer

minor visual intrusion from Fareham, Stubbington and HMS Collingwood	<p>to the appeal sites, Peel Common forms an incidental 'satellite' of the settlement pattern which has grown out of ribbon development along Newgate Lane and this is more prominent in the local landscape context.</p> <p>Given the existing context of the residential edges, particularly Peel Common, the appeal schemes are not considered to unduly influence this key feature of the Strategic Gap, particularly given the urbanising influence (and associated infrastructure of Newgate Lane East) along with mitigation in the appeal schemes which includes landscape buffers and additional landscape planting.</p>
A few scattered farmsteads/horticultural holdings and a mosaic of small fragments of open farmland and horse grazed pastures sandwiched between.	<p>This is more reflective of the appeal site and their local context, however it is useful to contrast this with similar farmsteads and horticultural buildings set within the more open arable landscape to the west. Fragmentation of the arable landscape in this area has also occurred through the implementation of Newgate Lane East which has severed several field parcels and hedgerows through the area.</p> <p>The appeal schemes have taken an approach of minimising impacts through reference to the scale and field pattern within the landscape which has defined the development envelopes for built form. Notwithstanding this positive approach, there is an acknowledged loss of agricultural land.</p>
Large scale non-agricultural uses of business and airfield development at Solent Airport in Daedalus to the south.	<p>There is limited physical and visual connections between the appeal sites and these features.</p> <p>The appeal schemes will not increase the prominence or extent of these uses in the landscape.</p>
<p>Utilities of:</p> <p>Peel Common Water Treatment Works enclosed from views by an earth bund and mature tree belt</p> <p>Peel Common Solar Farm</p>	<p>Both utilities are in close proximity to the appeal sites, the former acting as one of the main features that enclose the appeal site physically and visually and restrict the potential visibility of the appeal schemes in terms of visual effects.</p> <p>These features effectively contain the appeal scheme and prevent any perception (physically or visually) of them from the west, and in particular from the context of the arable landscape across to Stubbington.</p>
Construction site of Stubbington Bypass, which will provide an east-west route through the gap that has not previously existed.	<p>This feature is physically and visually separate from the appeal schemes, but will likely introduce a detracting feature into the landscape, much in the same way Newgate Lane East has in the locality of the appeal sites.</p>
Urban fringe character of Peel Common residential area	<p>The appeal sites are located adjacent to the 'satellite' residential area of Peel Common and will consolidate this area of the settlement.</p> <p>In terms of the gap, notwithstanding the extension of the settlement (albeit limited by the alignment of Newgate Lane East, the gap will continue to function much in the same way that the strategic gap in the north continues to function, with the consolidated</p>

	settlement area of Titchfield situated between the two more pronounced settlement edges.
Recently completed highway works to Newgate Lane and Peel Common Roundabout, with associated noise attenuation fencing and bus and cycle infrastructure.	Overall these key features reflect the independent judgements in the LVIA and earlier in this evidence as to the impact of Newgate Lane East on the landscape. In term of the gap, these features conflict with some of the primary measures in relation to tranquillity and drawing a distinction between settlements along major routes.

4.66. In respect of the Fareham-Stubbington Gap, the study draws together key conclusions in respect of the primary and secondary measures. Several key conclusions are summarised as follows (I include the full extract of the conclusions at **Appendix FL&BH 1.2.3** of my evidence):

- Minimum and maximum distances of ca. 300m to 1.8m [sic] (assumed km);
- That Peel Common represents a 'false' settlement edge;
- Two areas of the gap have distances of 350m and 300m but that these distances are still perceived as a sense of separation between neighbouring settlements, partly due to presence of mature vegetation;
- These represent 'minimum' gaps (within the 'rule of thumb') but are not appropriate to become a standard dimension as they would be weak and at risk of being lost (i.e. they are acceptable, but not ideal) – furthermore they function due to the context of linking to wider sections of the gap either side;
- Moderate to large gap distances of ca. 600m to 1.8km are 'good' distances;
- Presence of urban land uses can correspond to loss of tranquillity and dark night skies as urban fringe characteristics 'creep into the gap';
- In terms of land uses, sports fields and recreation grounds on the fringes of urban settlements have the potential to bring urbanising influence;
- In comparison to the Meon Gap there is not the same level of GI resource, however measures could be taken to increase these through positive environmental management; and
- Mitigation will be required where there is considered to be capacity to absorb development.

4.67. These conclusions are illustrated in the study by analysis diagrams of legibility/visibility and key distances (refer to extracts at **Plates 3 and 4**).

Plate 3: Extract illustrating the analysis of legibility/ visibility

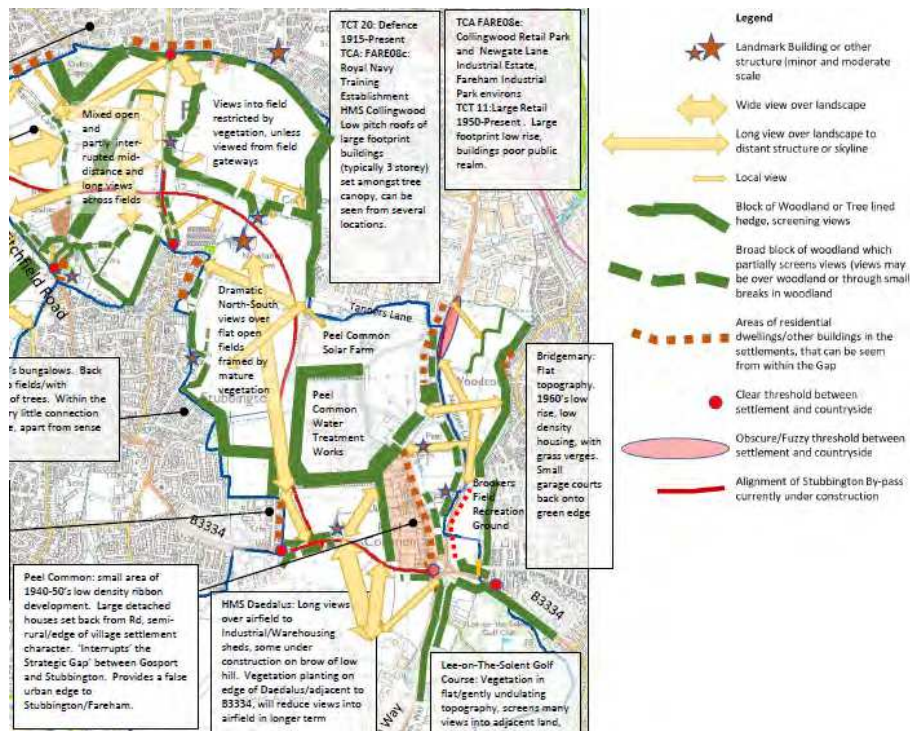
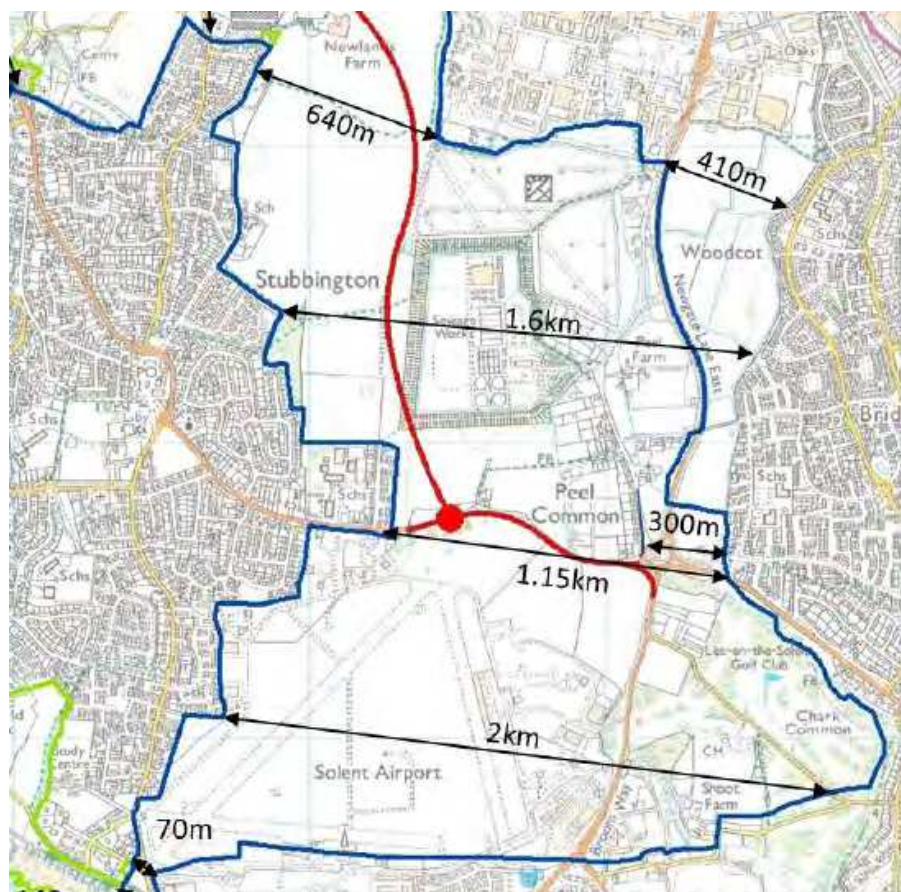


Plate 4: Extract illustrating key distances across the strategic gap



- 4.68. Having considered the analysis of the gap study, I refer back to the executive summary of the gap study where it notes that there exists some opportunities for development to be absorbed within the strategic gap without compromising its function. Further to illustrative extracts (**Plates 3 and 4**) I include some additional analysis of the gap in the context of the appeal sites (refer to **Appendix 1.2.4, Landscape Analysis of the Strategic Gap**).
- 4.69. The study suggest that an area south of Fareham and west of HMS Collingwood be considered, however this would place development in a more open and exposed part of the landscape, at a point where the existing gap (between HMS Collingwood and Newlands Farm/Stubbington) is only between ca. 325m and 550m. This would seem to contradict some of the principles set out in the analysis and conclusions.
- 4.70. I don't intend to critique the approach of the strategic gap study or its analysis, however I do think it is necessary to interrogate the robustness of the overall conclusions. The aims of the study include a review of the function of the strategic gaps in the Borough, but also to consider their boundaries. The study includes the necessary analysis to present a clear evidence base for amending boundaries in parts of the strategic gap. In relation to the edges of Fareham and Gosport, there is no recommendation to adjust the boundaries in this area, despite the findings of the study that:
- Some physical coalescence has already occurred;
 - These are some of the narrowest parts of the gap, resulting in a 'minimum functioning gap, that is weak';
 - Suburban edges and influences are often prominent, which reduces the effectiveness of the gap, including loss of tranquillity and presence of lighting;
 - Recreational land uses are present in the form of several sports and recreation grounds and these are noted as an issue in terms of their 'visual appropriateness'; and
 - The road network is such that there is no genuinely clear experience of a break between the settlement areas, particularly between Peel Common, Bridgemary and the southern edge of Fareham.
- 4.71. In relation to the landscape around the appeal sites, and particularly between Peel Common and Bridgemary, I cannot see how these trends would be reversed nor how the strategic gap could be strengthened, particularly with Newgate Lane East now forming such a strong urbanising feature in the local landscape context. The result is now the continued inclusion of a part of the gap that is weak and under pressure in the long term.

- 4.72. In that context I would think a logical and appropriate conclusion for the study would be to amend the boundary to omit this part of the landscape from the strategic gap, creating capacity for appropriate forms of development that could come forward with a strong framework of green infrastructure and mitigation. This would place an emphasis on the importance of the core, priority areas of the gap, between Fareham and Stubbington where the gap clearly delivers its role and function in full. However, I do appreciate that this is not the conclusion of the published study.
- 4.73. Returning to the conclusions of the study, it notes that development coincidental with LCA8 (Woodcot-Alver Valley) would be inappropriate. However, it goes on to state that Gosport and Fareham have already partly coalesced (along the A32) and that urban characteristics are present throughout the study area 8C (which is coincidental with the appeal sites).
- 4.74. Given the urbanising influences, along with the considerable green infrastructure which provide appropriate visual qualities and separation thresholds, I consider that development in this area would not be inappropriate, particularly given that the inherent mitigation would also contribute substantially to the green infrastructure network (as illustrated on the Composite Landscape Strategy (refer to **Appendix FL&BH 1.2.2**))
- 4.75. Having considered the analysis within the study analysis of the Fareham to Stubbington gap, I consider the appeal sites are well placed to accommodate development without undue consequences or impacts on the role and function of the strategic gap. This is on the basis that (refer also to **Appendix FL&BH 1.2.4**):
- In relation to distances, the appeal schemes will reduce the gap between Bridgemark and Stubbington physically from ca. 1.6km to ca. 1.1km which remains a considerable distance and well within the thresholds of the 'rule of thumb' appropriate distances;
 - In terms of visibility, the appeal schemes will be physically and visually well contained – they site within the strong green infrastructure framework that is evident by blocks of woodland and tree lined hedges which screen or partially screen views – furthermore they will not be visible across the strategic gap from Stubbington;
 - Existing screening is present immediately adjacent to the appeal sites in terms of the woodland around the waste water treatment works, also along Newgate Lane and within the merging framework of vegetation along Newgate Lane East that will continue to establish and increasingly provide a robust visual screen from the east;

- The surrounding context and urbanising influences, including the settlement area of Peel Common which reduce the degree of change;
- The opportunity to contribute to, and maintain, a strong green infrastructure network that complements both the strategic gap and the areas of settlement, in the form of the landscape d areas and landscape buffers along the eastern and western edges of the appeal sites which will reinforce and connect the linear routes which cross broadly north to south through this area;
- In connection with the green infrastructure provision, the ability to incorporate substantial mitigation that will successfully avoid or minimise landscape and visual effects.

4.76. I also note that, notwithstanding differences in the technical approaches, the Pegasus group and Hampshire County strategic gap studies both independently acknowledge that the strategic gap can accommodate some form of growth and development within it. Both also recognise the need for additional, more detailed assessment on a site /project basis.

4.77. For the appeal schemes, this more detailed site analysis has been completed in the form of the submitted landscape and visual impact assessments. This iterative approach to design, based on the impact assessment, has informed the inherent mitigation to the masterplan and concludes that the proposed developments would be acceptable.

4.78. On this basis, I consider that the appeal schemes can come forward without a significant effect on the integrity and function of the strategic gap and without conflict to the aim of the Fareham to Stubbington Gap which is to avoid coalescence between Fareham and Bridgemark with Stubbington and Lee-on-the-Solent.

d) The application site is not sustainably located adjacent to, well related to or well-integrated with the existing urban settlement boundaries.

4.79. The final issue raised buy the reason for refusal in respect of landscape and visual matters related to the settlement boundaries and relationship between the sites and the urban edge.

4.80. Notwithstanding that this is more generally a planning matter related to the definition of settlement boundaries, I consider it useful to briefly consider the existing urban and suburban areas from a landscape and visual perspective; including how these relate to the site. This includes reference to Newgate Lane East and the potential 'future baseline' that could include emerging development of the former HA2 allocation.

- 4.81. In the context of the appeal sites, the current settlement pattern is defined by the edges of Fareham and Bridgemary which are generally defined by residential development, including some green infrastructure. Other settlement areas are that of Peel Common, which would appear to be a small 'satellite' of predominantly residential development, historically small scale ribbon development along Woodcote Lane and Newgate Lane. There is a mix of dwellings in terms of age, appearance and scale, and no one aspects really binds the settlement character together or delivers a unique sense of place.
- 4.82. The strategic gap study describes Peel Common as a 'false urban edge' and this is likely due to the visibility of dwellings on the approach from Stubbington, which briefly gives way to the open space of Brookers Field Recreation Ground before entering Gosport.
- 4.83. The surrounding landscape context to Peel Common is influenced equally by the agricultural landscape along with several areas of recreational open space and sports pitches. Newgate Lane East, Peel Common Roundabout and the utilities of Peel Common solar farm and the waste-water treatment works are all notable features that influence the character and pattern of the satellite settlement.
- 4.84. In terms of the more extensive urban areas that are located nearby, there is some connectivity close to Gosport Road a partial connection between Peel Common to Gosport in the form of Woodcote Lane (and its associated residential dwellings) and the amenity open space of Brookers Field Recreation Ground.
- 4.85. The reason for refusal suggests that the appeal schemes will not relate to, or integrate with, the existing urban settlement boundaries.
- 4.86. However, the appeal sites are located immediate to the east of Newgate Lane, and are physical contained by the alignment of Newgate Lane East; they sit immediately adjacent to the existing residential dwellings off Woodcote Lane and directly opposite the mix of dwellings and urban influences along the northern section of Newgate Lane. Together the appeal schemes will consolidate the pattern of Peel Common within a clearly prescribed and defined limit.
- 4.87. Furthermore, the proposals for green infrastructure and open space that form an integral part of the masterplans will set the proposed developments in a landscape framework that reflects some of the characteristics of Peel Common where tree belts and hedgerows are present to a greater or lesser degree across parts of the satellite. This includes proposals for an area of green space directly adjacent to Newgate Lane

that will form a green corridor that runs broadly through the centre of the emerging pattern.

- 4.88. Green infrastructure and open space on the eastern edge will integrate with the highways landscape planting along Newgate Lane East and together this will add to the containment of this pocket of settlement.
- 4.89. As such I consider that the appeal schemes will integrate well, and in a positive way, with the settlement area at Peel Common.
- 4.90. As previously noted, there exists some physical connections between Peel Common and Bridgemary. With the appeal schemes in place, the consolidated pattern of Peel Common would continue to blend with the urban edge of Gosport and Bridgemary, focused along the green route into Bridgemary (along Woodcote Lane) and focussed on the large amenity open space of Brookers Field Recreation Ground.
- 4.91. Whilst forming a consistent part of the overall settlement edge, these would be characterised by a softer transition than the current settlement edge, incorporating a strong network of green infrastructure which links the wider countryside to the west of HMS Collingwood, through the green infrastructure of the solar and waste water facilities, along the open spaces of the appeal schemes and Newgate Lane East, connection to the recreation ground and the wider extent of the Alver Valley further south.
- 4.92. At the time of writing the direction of the Local Plan had altered slightly and the former emerging allocation of HA2 had been removed. However, were HA2 to come forward this broader allocation would form a logical connection between Peel Common (including the appeal sites) and the edge of Fareham. This would represent a clear connection to the settlement edge of Fareham and a logical pattern of the settlement in this area. Furthermore, given the opportunities for including and extending the green infrastructure network, that larger extent of the settlement can come forward with a suitable mitigation strategy.
- 4.93. In each eventuality, I consider there to be a good connection between the appeal schemes and the existing areas of the settlement.

5. RESPONSE TO POLICY

- 5.1. In the context of the analysis of effects identified in the previous section, I now go on to address the policy context, addressing these in respect of landscape and visual matters.
- 5.2. There are also several other saved and emerging policies relevant to landscape and visual matters which are not referenced in the reason for refusal but against which the appeal scheme will potentially make a positive contribution.

National Planning Policy Framework

- 5.3. The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development. Reference to the NPPF in the reason for refusal generally relate to sustainability and transport (noting paras 103, 109 and 110). Notwithstanding that landscape is not addressed at this level, there are other parts of the NPPF that are relevant.
- 5.4. NPPF paragraph 8 defines three overarching objectives to sustainable development, economic, social and environmental. The environmental objective (c) is explained in the following terms:
- 5.5. *“To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 5.6. Section 15 of the NPPF is concerned specifically with conserving and enhancing the natural environment. Paragraph 170 notes that the planning policies and decisions should contribute to and enhance the natural and local environment by (a) protecting and enhancing ‘Valued Landscapes’ in a manner commensurate with their statutory status or identified quality in the Development Plan.
- 5.7. It is common ground that The site is not a ‘valued landscape’ for the purposes of Paragraph 170 of the NPPF.
- 5.8. The NPPF paragraph 170 also notes in sub section (b) that (my own emphasis):
- 5.9. *“Recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and eco system services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”*

- 5.10. To satisfactorily address policy at a national level it is necessary to undertake an appraisal of landscape character making reference to published guidance, but also looking more specifically at the local landscape character. This establishes a detailed baseline position for the landscape character of a site or area in question and presents and understanding of its sensitivity.
- 5.11. The submitted landscape and visual assessments that were prepared in support of the applications were undertaken using a methodology which accords with current best practice guidance for landscape and visual impact assessment (i.e. GLVIA3).
- 5.12. The submitted LVIA's make reference to published landscape character assessment prepared at a national, regional and district level and also addresses local character by reference to the description of the appeal site and its immediate context. The subsequent design of the proposed development reflects the relevant aspects of the local landscape character to ensure that impacts are minimised, that the proposals can be assimilated into the landscape and that mitigation forms an inherent part of the proposed development. Consequently, the LVIA responds fully to the requirement of the NPPF.

Adopted Fareham Borough Core Strategy 2011

- 5.13. The following section responds to policies included in the reason for refusal that are relevant to landscape and visual matters.

Policy CS4: Green Infrastructure, Biodiversity and Geological Conservation

- 5.14. This policy relates habitats and biodiversity and also ecologically focussed designations, however it also refers to the protection of trees and woodland. There is some relevance to landscape and visual matters by virtue of the parts of the policy that refer to green infrastructure. The policy refers to networks of accessible multi-functional green infrastructure to be planned around existing green spaces in urban, urban fringe and rural areas.
- 5.15. The appeal schemes incorporate a landscape strategy that forms an integrated part of the development proposals and sets a green framework for the masterplan. Notwithstanding the two applications are administratively separate, the landscape and green infrastructure strategies work together to provide a comprehensive framework of retained vegetation, proposed open space and augmentation of these through additional landscape works (refer to **Appendix FL&BH 1.2.2**).

- 5.16. Furthermore the green infrastructure network across the appeal sites dovetails with the wider green infrastructure network as it extends from the landscape to the west of Fareham, through the network of vegetation and open spaces to the north of Peel Common and along New Newgate Lane, and down toward the Alver Valley in the south.
- 5.17. Overall, the appeal schemes are considered to be consistent with and positively contribute to the policy in landscape and visual terms.

Policy CS14: Development Outside Settlements

- 5.18. This policy states that, for land outside the defined settlements, development will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function.
- 5.19. Both applications have been supported by comprehensive LVIAs which have found the proposals to be acceptable in landscape and visual terms. These documents also demonstrate the physical and visual containment of the appeal sites in relation to both the local landscape character and visual receptors.
- 5.20. In my evidence I have presented additional analysis that demonstrates the appeal schemes respond positively to the local landscape character and that this approach integrates mitigation that aims to avoid or minimise potential impacts. Some degree of residual impact is acknowledged at a site level, however in the context of the urban fringe context in this part of the landscape, the degree of impact is not considered to be at a level that would adversely affect the overall character of this part of the landscape.

Policy CS17: High Quality Design

- 5.21. This policy requires that proposed developments be of a high quality of design. This includes the need to, amongst other criteria:
- respond positively to and be respectful of the key characteristics of the area, including landscape
 - provide continuity of built form
 - provide green infrastructure, including landscaping, open spaces, greenways and trees

Policy CS22: Development in Strategic Gaps

- 5.22. This policy relates to land within a Strategic Gap and states that development proposals will not be permitted where it 'significantly' affects the integrity of the gap and the physical and visual separation of settlements.
- 5.23. The submitted LVIAs demonstrate that the appeal sites are physically and visually well contained. Landscape and visual impacts are limited to a highly localised area and the appeal sites together are contained in a strong framework of the existing settlement area of Peel Common, infrastructure (with associated vegetation) and the alignment of Newgate Lane East. This containment will be strengthened over time as mitigation within the schemes – and along Newgate Lane East – becomes established.
- 5.24. Additional analysis presented in my evidence also demonstrates several points in relation to the Strategic Gap, including that the key area for separation is between Stubbington and Fareham (including up to the western extent of Peel Common) and that the strategic gap in the area around Peel Common has been undermined to the point where it is no longer fulfils its role effectively.
- 5.25. Together, the containment of the site along with the strength of the gap between Stubbington and Fareham (at Peel Common) means that there will not be a significant effect on the integrity of the gap and consequently I do not see any conflict with this policy.

Adopted Fareham Borough Local Plan Part 2: Development Site and Policies Plan (June 2015)

Policy DSP40: Housing Allocations

- 5.26. This policy notes that, in the scenario where the Council does not have a five year supply of land for housing, additional housing sites, outside the urban area boundary, may be permitted. The policy sets out several criteria of which the following is relevant to landscape and visual matters:
- ii. The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;
- Response: My evidence demonstrates the relationship between the appeal schemes and Peel Common and how this area, already partly connected to the

edge of Gosport, would be consolidated as an area of settlement and present a well defined edge to the eastern edge of the Strategic Gap.

- iii. The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;

Response: My evidence has also demonstrated, in addition to the submitted LVIA, how the appeal schemes reflect local landscape character and a limit landscape and visual effects overall. My evidence also demonstrates that there will be no significant effect on the integrity of the strategic gap between Stubbington and Fareham.

- 5.27. Overall, in respect of landscape and visual matters, I do not consider there to be a conflict with this policy.

Other Matters

- 5.28. Matters raised in objection to the proposed scheme were summarised in the report to committee, including comments from the statutory consultees and several public comments. These include reference to matters of the countryside, strategic gap landscape and landscape character impacts and
- 5.29. I have dealt with these issues throughout my evidence in respect of several of the related points, including with reference to the submitted LVIAs, additional landscape and visual analysis in this evidence and the subsequent response to policy.

6. SUMMARY AND CONCLUSION

- 6.1. This evidence is written on behalf of Fareham Land LP and Bargate Homes Ltd (the appellants) and relates to an appeal for non-determination by Fareham Borough Council in respect of two outline applications for residential development, both on land to the east of Newgate Lane. This evidence sets out an overview of relevant landscape and visual matters.
- 6.2. Together, the appeal sites extend to ca. 10 hectares (ha) of agricultural land, situated close to the urban edge of Fareham and Gosport, that is bounded by Newgate Lane to the west, Woodcote Lane to the south and Newgate Lane East to the east (with Newgate Lane and Newgate Lane East framing the northern edge of the sites also).
- 6.3. The wider landscape context of the appeal sites includes the low-lying ground of the coastal plain, characterised by abrupt the transition between the open landscapes and the adjacent urban environments of Fareham, Gosport (with Woodcot and Bridgemary). The settlement area of Stubbington forms the western extent of the Strategic Gap, extends across the coastal plain between the local settlement areas. Separation is most pronounced across the arable areas between Fareham/Peel Common and Stubbington.
- 6.4. Both applications were submitted with a detailed LVIA. These not only set out a comprehensive baseline and robust assessment of predicted impacts, but include details as to how landscape and visual matters have influenced the design of the masterplan, with mitigation measures consequently forming an inherent part of the proposals, both independently but also in respect of the complementary approach of the two schemes.
- 6.5. The reasons for refusal raises three main issues in reset of landscape and visual matters, stating that:
- b) The proposed development fails to respond positively to and be respectful of the key characteristics of the area and would be harmful to the character and appearance of the countryside;
 - c) The provision of development in this location would significantly affect the integrity of the strategic gap and the physical and visual separation of settlements;
 - d) The application site is not sustainably located adjacent to, well related to or well-integrated with the existing urban settlement boundaries;
- 6.6. This evidence considers the reasons for refusal against various information, including the submitted Landscape and Visual Impact Assessments, various consultation

responses, report to committee and other relevant baseline and evidence base material related to landscape and visual matters.

- 6.7. The submitted LVIAs address the key characteristics of the appeal sites and their immediate context. The submitted LVIAs also set out an assessment of the impact and approach to mitigation. This comprehensive process also enables judgements to be drawn in respect of the context of the appeal sites in relation to the existing urban settlement edges/boundaries.
- 6.8. The purpose and function of the strategic gap in terms of providing physical and visual separation between settlements and how the site functions in relation to the wider gap has been addressed the a 'strategic landscape and visual appraisal' (prepared by Pegasus Group) and also by reference to the updated Technical Review of Areas of Special Landscape Quality and Strategic Gaps, prepared by Hampshire County Council on behalf of FBC.
- 6.9. With reference to this material, and supported by my own additional analysis where necessary, I conclude that the appeal schemes will not be harmful to the character and appearance of the countryside, will not significantly affect the integrity of the Strategic Gap and will relate well to the existing patterns of settlement.
- 6.10. This is on the basis the relevant key landscape characteristics of the area have been considered through the process of LVIA, consequently informing the analysis of constraints and opportunities, and ultimately the landscape strategy for the mitigation. This forms an integrated part of the two masterplans for northern and southern schemes.
- 6.11. Consequently, I consider the approach taken to the design of the respective masterplans to have adopted a positive approach in landscape and visual terms.
- 6.12. The loss of the agricultural enclosures and replacement of these areas with residential development is largely the main cause of impact, however this is balanced by the response to the grain and pattern of the landscape and its scale, as well as the response to the characteristics of the landscape, several of which are defined as 'essential' by the published guidance. Where these are referenced, mitigation adopts an approach of retention and/or enhancement.
- 6.13. I consider that the subsequent residual impacts of the appeal schemes will be acceptable in landscape and visual terms.

6.14. In terms of the Fareham to Stubbington gap, I consider the appeal sites are well placed to accommodate development without undue consequences or impacts on the role and function of the Strategic Gap. This is on the basis that:

- In relation to distances, the appeal schemes will reduce the gap between Bridgemary and Stubbington physically from ca. 1.6km to ca. 1.1km which remains a considerable distance and well within the thresholds of the 'rule of thumb' appropriate distances set out in the FBC study;
- In terms of visibility, the appeal schemes will be physically and visually well contained – they sit within the strong green infrastructure framework that is evident in the form of blocks of woodland and tree lined hedges which screen or partially screen views – furthermore they will not be visible across the Strategic Gap from Stubbington;
- Existing screening is present immediately adjacent to the appeal sites in terms of the woodland around the waste water treatment works, along Newgate Lane and within the emerging framework of vegetation along Newgate Lane East that will continue to establish and increasingly provide a robust visual screen from the east;
- The surrounding context and urbanising influences, including the settlement area of Peel Common which reduce the degree of change;
- The opportunity to contribute to, and maintain, a strong green infrastructure network that complements both the strategic gap and the areas of settlement, in the form of the landscape d areas and landscape buffers along the eastern and western edges of the appeal sites which will reinforce and connect the linear routes which cross broadly north to south through this area; and
- In connection with the green infrastructure provision, the ability to incorporate substantial mitigation that will successfully avoid or minimise landscape and visual effects.

6.15. I also note that, notwithstanding differences in the technical approaches, the Pegasus Group and FBC Strategic Gap studies both independently acknowledge that the Strategic Gap can accommodate some form of growth and development within it. Both also recognise the need for additional, more detailed assessment on a site/project basis.

6.16. In respect of the conclusions of the FBC Strategic Gap study (where these note the relatively poor state of the gap at this point), I would think a logical and appropriate conclusion would be to amend the boundary to omit this part of the landscape from the Strategic Gap, creating capacity for development to come forward with a strong framework of green infrastructure and mitigation. This would place an emphasis on the

importance of the core areas that are located further west, between Fareham and Stubbington where the Strategic Gap clearly delivers its role and function in full.

- 6.17. Finally, the reason for refusal suggests that the appeal schemes will not relate to, or integrate with, the existing urban settlement boundaries. However, my evidence demonstrates that the appeal sites are well related to Peel Common, being located to the east of Newgate Lane, physical contained by the alignment of Newgate Lane East and situated immediately adjacent to the existing residential dwellings off Woodcote Lane and directly opposite the mix of dwellings and urban influences along the northern section of Newgate Lane.
- 6.18. With existing and proposed green infrastructure in place, the appeal schemes will consolidate the pattern of Peel Common within a clearly defined limit. As such I consider that the appeal schemes will integrate well, and in a positive way, with the settlement area at Peel Common.
- 6.19. Furthermore, there are some existing physical connections between Peel Common and Bridgemark. With the appeal schemes in place, the consolidated pattern of Peel Common would continue to blend with the urban edge of Gosport and Bridgemark, focused along the green route into Bridgemark (along Woodcote Lane) and focussed on the large amenity open space of Brookers Field Recreation Ground.
- 6.20. If the previous emerging allocation of HA2 were to come forward, this broader area of development would reinforce the connection between Peel Common (including the appeal sites) and the edge of Fareham. In each eventuality, I consider there to be a good connection between the appeal schemes and the existing areas of the settlement.
- 6.21. In all respects, considering Peel Common in itself, connections to Gosport, and with the potential for HA2 to come forward, development in this area will maintain a robust gap between Fareham (aligned with the western edge of Peel Common) and Stubbington.
- 6.22. Overall, in the context of these limited issues, and with the appeal schemes in place, landscape and visual issues are not sufficient to support a prospective reason for refusal.

APPENDICES

APPENDIX A

[insert as necessary]

FIGURES

APPEAL BY FAREHAM LAND LP AND BARGATE HOMES LTD

LAND AT NEW GATE LANE (NORTH) AND LAND AT NEW GATE LANE (SOUTH), FAREHAM, HAMPSHIRE

LANDSCAPE AND VISUAL MATTERS: APPENDICES

PREPARED BY:

JAMES W. ATKIN
BSC (Hons) DIP LM CMLI



5 The Priory, Old London Road, Canwell, Sutton Coldfield, B75 5SH

T 0121 308 9570 www.pegasusgroup.co.uk

APPENDICES

APPENDIX FL&BH 1.2.1	Extract from the Fareham Landscape Assessment
APPENDIX FL&BH 1.2.2	Composite Landscape Strategy
APPENDIX FL&HB 1.2.3	Extract from the 'Technical Review of AoSLQ and Strategic Gaps'
APPENDIX FL&BH 1.2.4	Landscape Analysis of the Strategic Gap

APPENDIX FL&BH 1.2.1

EXTRACT FROM THE FAREHAM LANDSCAPE ASSESSMENT

2017

FAREHAM LANDSCAPE ASSESSMENT

LD&DESIGN



PHOTOGRAPHIC COPYRIGHT AND CREDITS

Cover image: © Copyright Jon Mitchell and licensed for reuse under Creative Commons Licence

Images used in this report are the property of Fareham Borough Council or LDA Design unless otherwise attributed.

All images attributed to others have been credited by name to the original source and reproduced under the terms of this licence <http://creativecommons.org/licenses/by-sa/2.0/>. Images have not been remixed, transformed or otherwise modified in any way but some may have been cropped or re-sized to fit the layout of the document.

ACKNOWLEDGEMENTS

The Fareham Landscape Assessment was produced by the following Core Project Team from *LDA Design*:

Clare Harpur
Tim South
Spencer Powell
Dave Wesselingh
Ian Houlston
Helen McKenzie
Katie Harrison

The team gratefully acknowledges the support and contribution provided by the following members of the Client Team from Fareham Borough Council:

Adam Collier
Nicholas Cutler
Pablo Newberry
Hannah Chivers
Hazel Taylor

**Version 01
August 2017**

^A Kings Wharf, The Quay
Exeter EX2 4AN
United Kingdom

^T +44 (0) 1392 260 430

^F +44 (0) 1392 260 431

^W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No: 09312403
17 Minster Precincts, Peterborough PE1 1XX

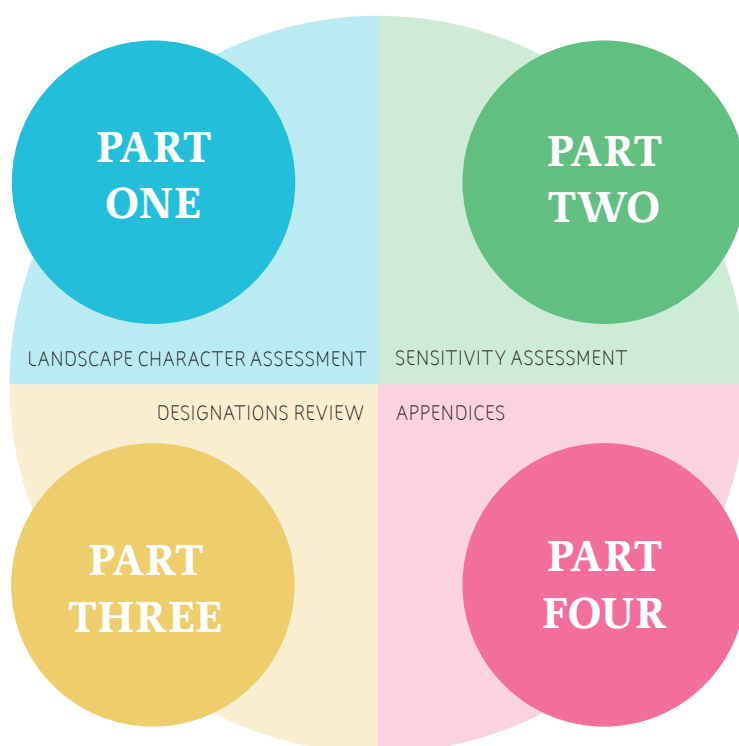
PREFACE

The National Planning Policy Framework makes a clear commitment to conserving the natural environment in the planning system and recognises that it has a key role to play in the achievement of sustainable development. The Framework principles and policies make clear that planning should take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside and promoting local distinctiveness. Planning policies and decisions should be based upon up-to-date and relevant evidence about the landscape characteristics of the area and the primary tools for achieving this are landscape character assessments and, where appropriate, assessments of landscape sensitivity.

Fareham Borough Council is currently undertaking a review of its adopted Local Plan and commissioned *LDA Design* to up-date and expand upon the previous Fareham Landscape Assessment, undertaken in 1996, to provide robust evidence to inform Local Plan policy and planning decisions. The study brief included three main components:

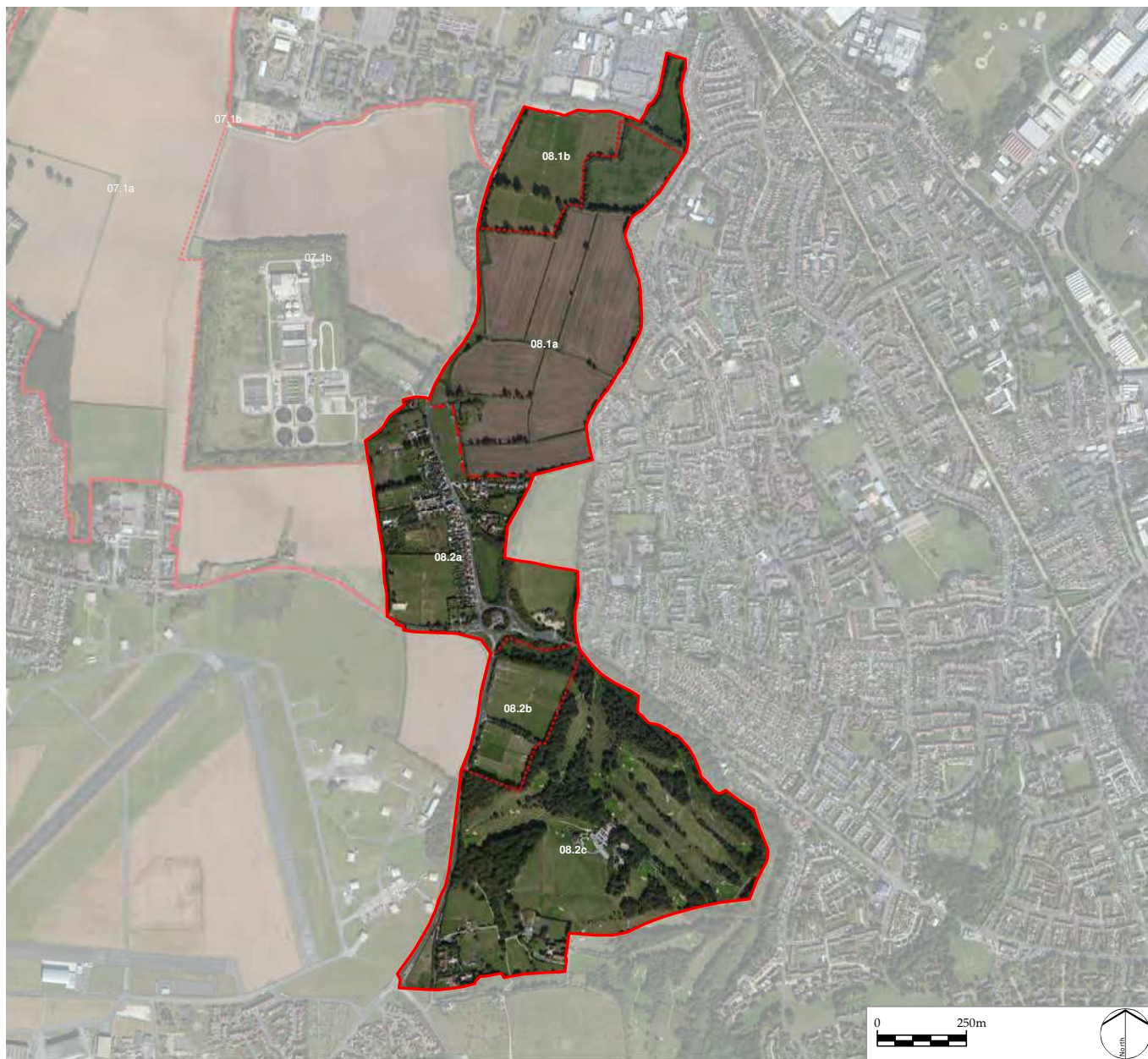
- Landscape character assessment - a review of the baseline 'audit' of the character of the Borough landscape provided by the 1996 Landscape Character assessment, updated as necessary. The aim is to improve understanding of the key characteristics of the landscape that make places distinctive and different from one another, rather than better or worse;
- Landscape Sensitivity Assessment - detailed analysis and judgements regarding the value of the landscape and its sensitivity to change. The aim is to assist the Council in the evaluation of possible development options/alternatives to meet housing needs in the Local Plan Review and to inform the assessment of potential impacts on the landscape when determining planning applications;
- Designations Review - a review of landscape designations within the Borough, with specific reference to 'Strategic Gaps' and 'Areas of Special Landscape Character', but also 'other areas of protected or valued landscape designations'. The aim is to assist the Council in framing policy related to landscape protection, strategic gaps and settlement boundaries within the review of the Local Plan.

These components are presented in three separate 'parts', supported by appendices, and together form the 2017 Fareham Landscape Assessment. It should be emphasised that the assessment findings are based upon the professional judgement of the qualified landscape architects/planners within the consultant team and have not been influenced by, nor tested against, the opinions of the Council or the public.



2.8 LCA 8: WOODCOT-ALVER VALLEY

LOCAL LANDSCAPE CHARACTER AREAS



LEGEND

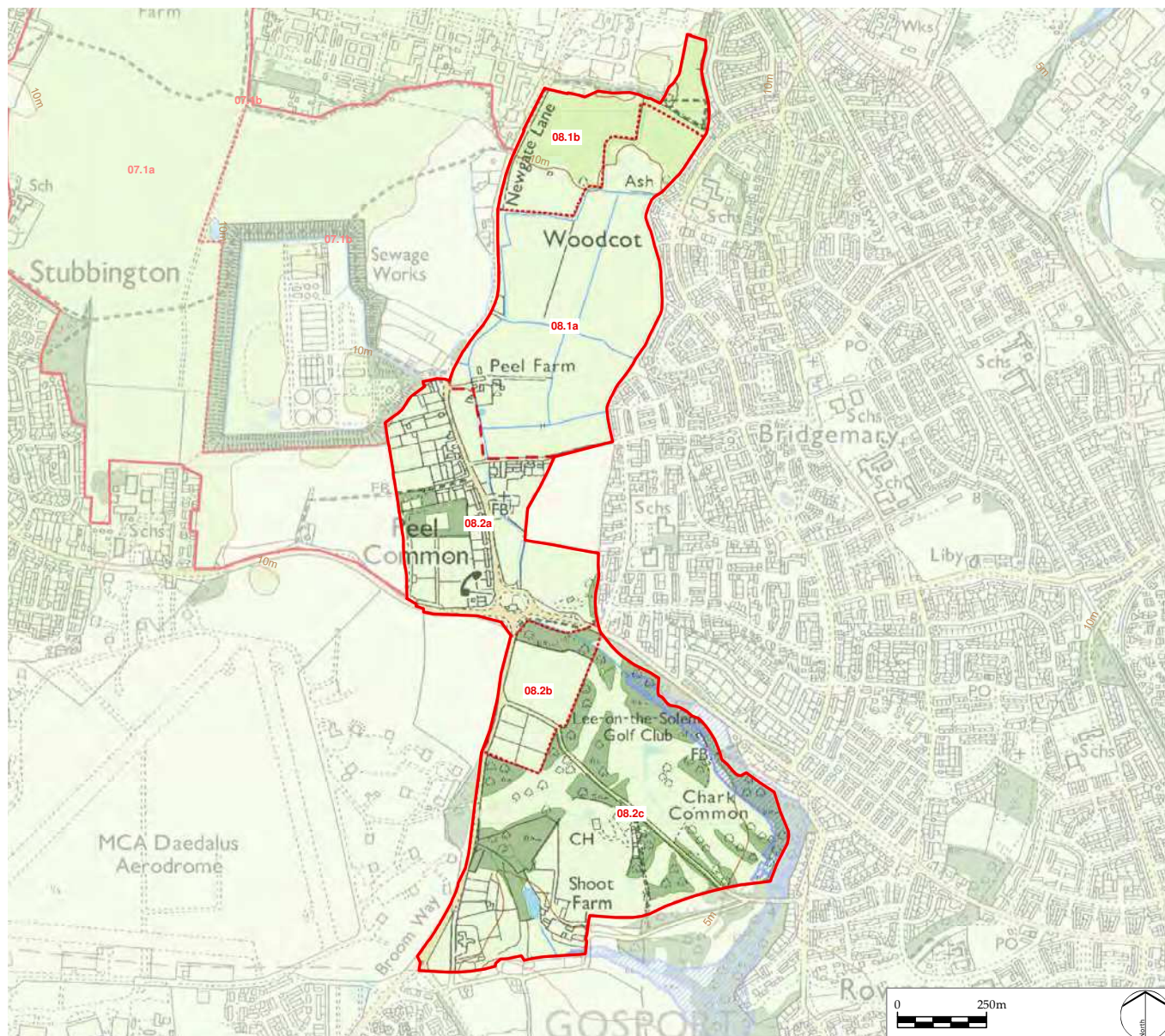
- Landscape Character Area
- Local Landscape Character Area
- Local Landscape Character Area Subdivision



Location Diagram

LCA 8 - WOODCOT-ALVER VALLEY

PHYSICAL AND VISUAL CHARACTERISTICS



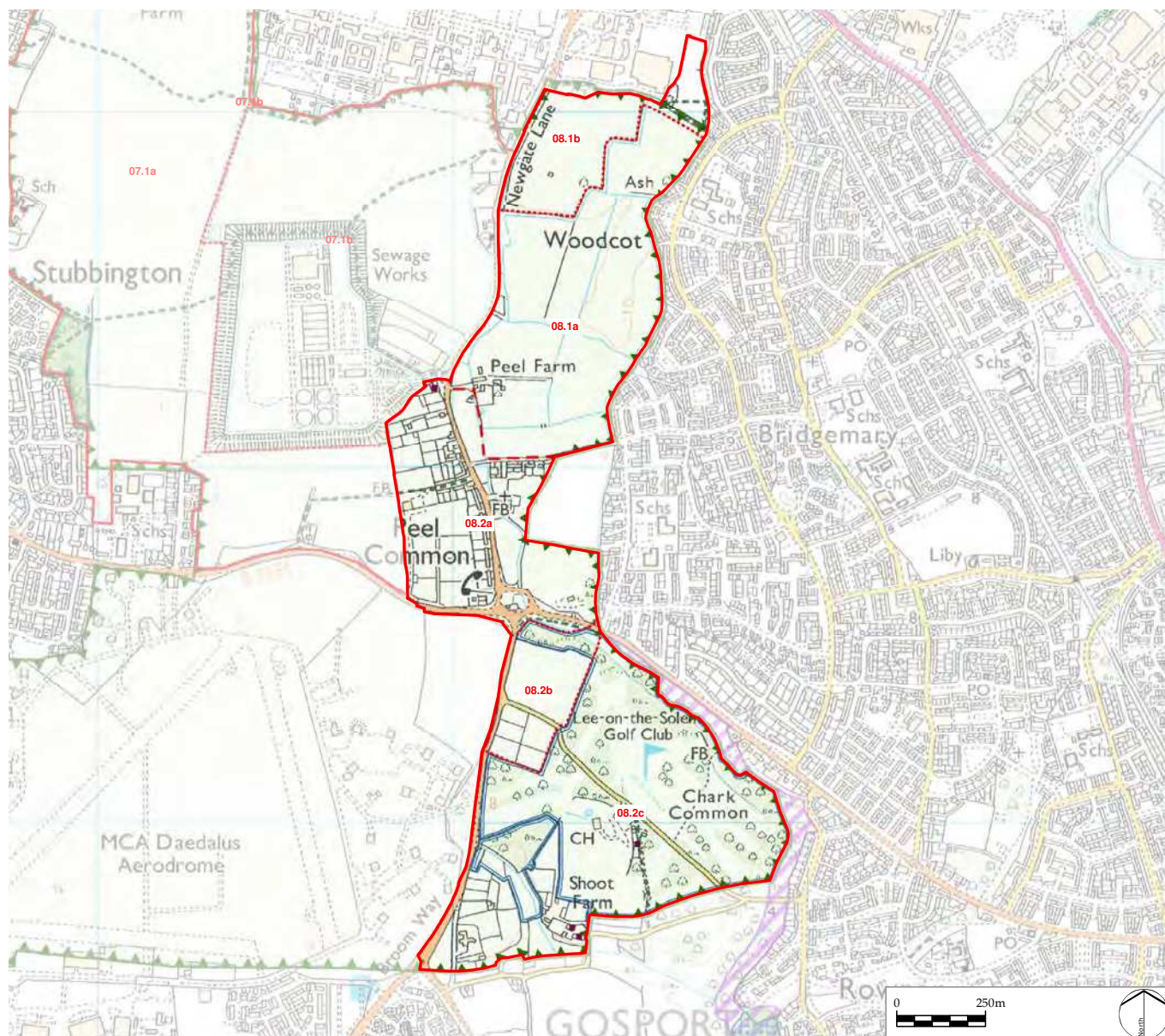
LEGEND

- Landscape Character Area
- Local Landscape Character Area
- Local Landscape Character Area Subdivision
- Water
- Flood Alert Areas

- Woodland
- 5m Contours
- Elevation (m AOD)**
- 0m
- 60m

LCA 8 - WOODCOT-ALVER VALLEY

PLANNING CONTEXT



LEGEND

	Landscape Character Area		The Meon Gap
	Local Landscape Character Area		Sites of Importance for Nature Conservation
	Local Landscape Character Area Subdivision		

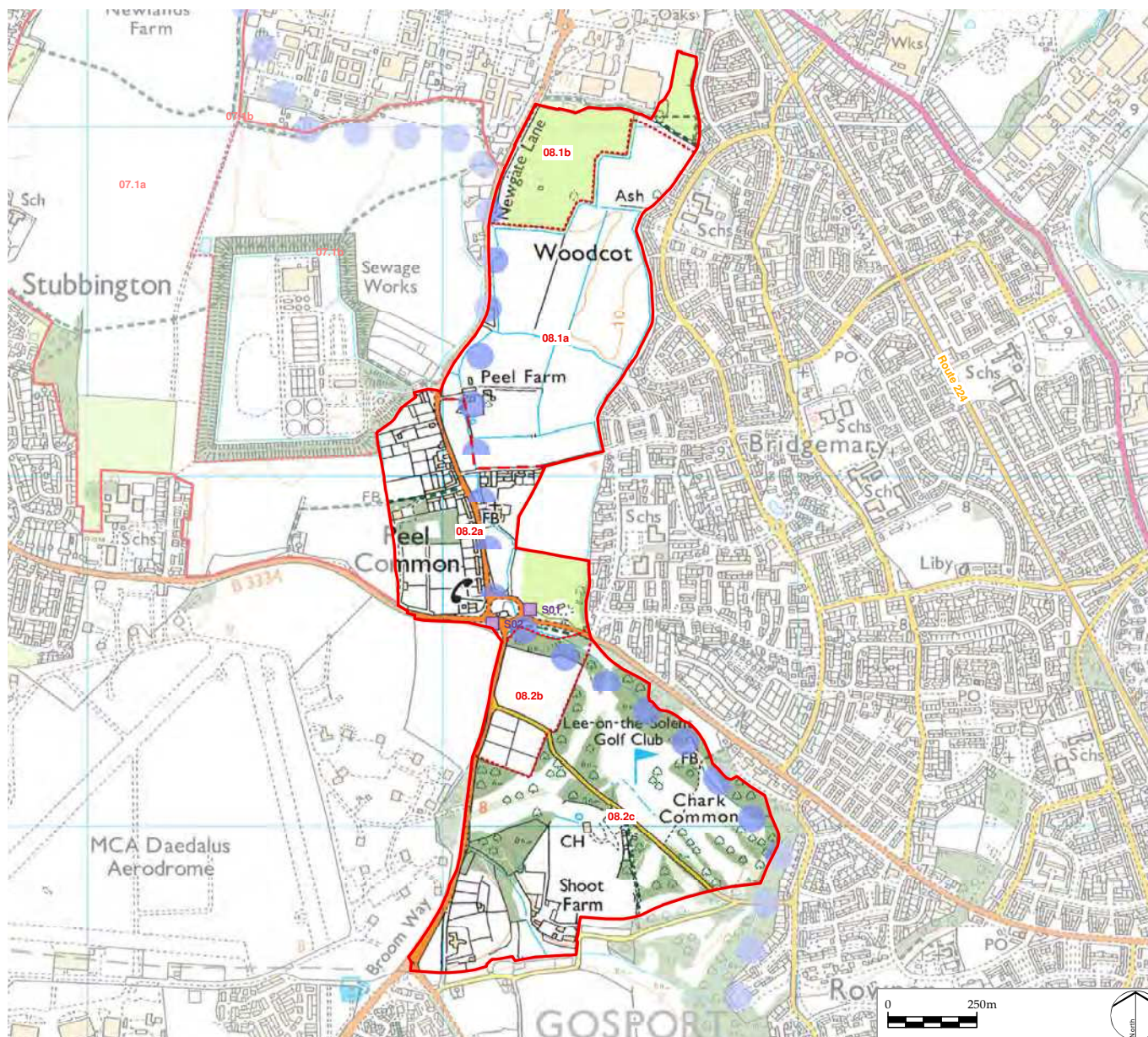
Designations

Listed Building Grade

I
 II
 II*

LCA 8 - WOODCOT-ALVER VALLEY

GREEN INFRASTRUCTURE

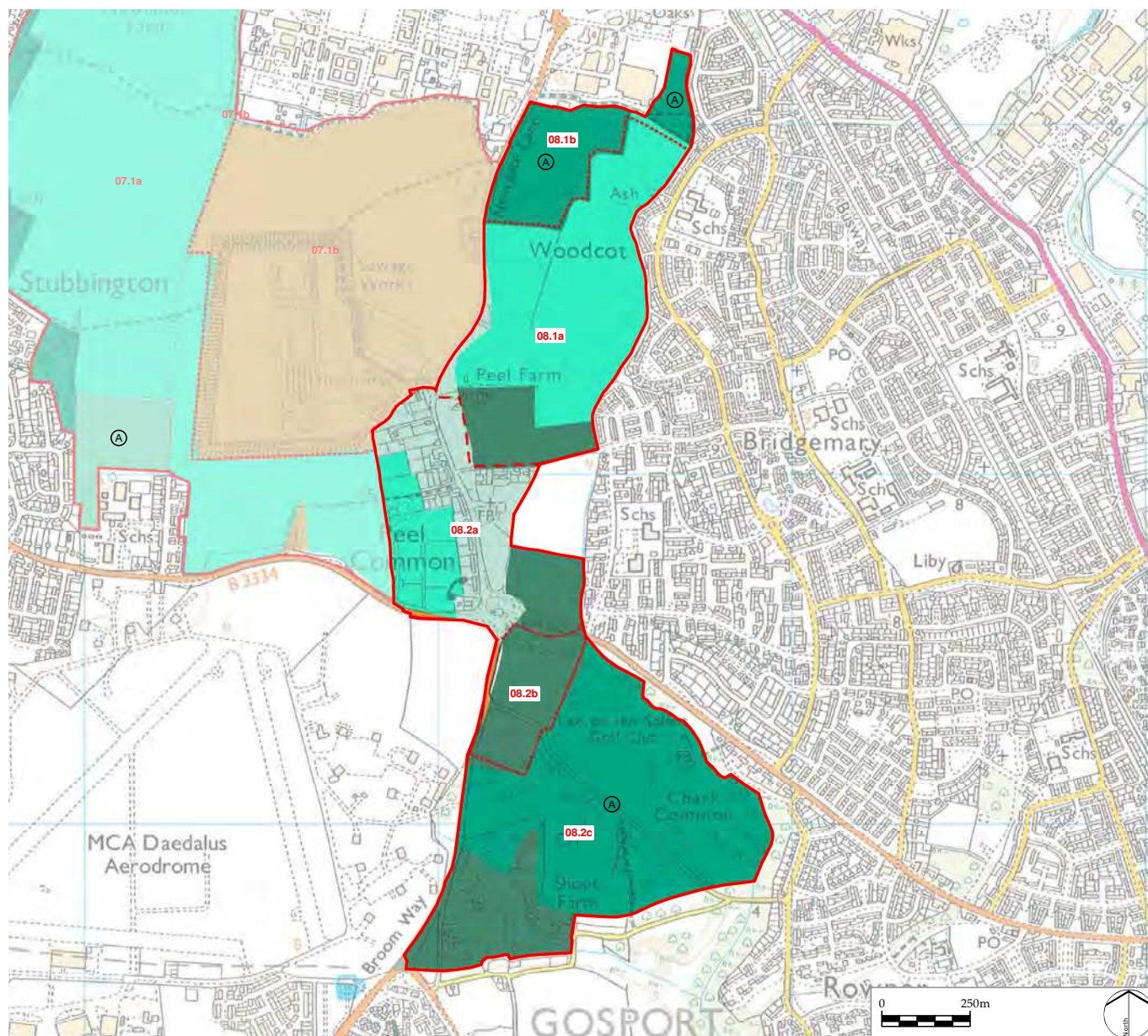


LEGEND

	Landscape Character Area		Woodland
	Local Landscape Character Area		Existing Open Space
	Local Landscape Character Area Subdivision		Green Infrastructure Sub-Regional Blue Corridor
	Green Infrastructure Projects		

LCA 8 - WOODCOT-ALVER VALLEY

LANDSCAPE CHARACTER TYPES



LEGEND

	Landscape Character Area
	Local Landscape Character Area
	Local Landscape Character Area Subdivision

Landscape Types

	Open Coastal Plain: Weak Structure
	Open Coastal Plain: Strong Structure
	Open Coastal Plain: Fringe Character
	Enclosed Coastal Amenity Land

LLCA 8.1 - WOODCOT

LANDSCAPE RESOURCE - SENSITIVITY ASSESSMENT

LANDSCAPE CHARACTER, QUALITY AND VALUE

This area forms part of the easternmost extent of the Stubbington–Fareham Strategic Gap. It is bounded by Newgate Lane to the west, beyond which lie the Newlands Solar Farm and Peel Common Waste Water Treatment Works. Out-of-town retail uses border the area to the north, while the eastern boundary is shared with the western edge of the Bridgemary area of neighbouring Gosport district. The southern boundary is formed by Woodcote Lane.

The LLCA is divided into two sub-areas, reflecting different land uses and their effects on intrinsic landscape character and quality. **Area 8.1a** comprises the land between Woodcote Lane in the south and Speedfield Park Playing Fields in the north. This area shares the typically flat, low-lying character of the coastal plain landscape that extends south and westwards to the Solent, but lacks the very expansive and denuded character of these areas. It is characterised by medium-scale, regular shaped fields, mostly under arable cultivation, bounded by a network of drainage ditches and a relatively intact structure of hedgerows, albeit heavily trimmed with some gappy sections and few mature hedgerow trees. Internally, the area has an open character but tree belts form taller, denser boundaries around the periphery of the area, especially to the north, east and south, which give the area a sense of enclosure from surrounding urban areas. The western boundary along Newgate Lane is more open and allows some intrusion from passing traffic but the area is devoid of built development (apart from farm buildings at Peel Farm) and retains a predominantly unspoilt, rural, agricultural character with limited intrusion from surrounding urban influences.



Area 8.1b is comparatively small and comprises two separate areas of recreation land and playing fields collectively referred to as Speedfields Park, connected by a surfaced pedestrian and cycle route. Both areas comprise amenity grassland and are enclosed by well-treed boundaries. The larger field adjacent to Newgate Lane contains a pavilion building and small car park along its northern boundary, with a variety of rugby posts, football goalposts and tall flood lights located in the centre of the field. The smaller field to the north east contains a single sports pitch and a children's play area in the south west corner. Despite retaining some of the characteristics of the adjacent landscape type (e.g. flat landform, well-defined hedgerow and tree boundaries and a regular field pattern) the introduction of built elements, car parking and management for sports use give the area a suburban, rather than rural agricultural, character.

The landscape of area 8.1 is not covered by any current national or local landscape designation. Scenic quality is not exceptional and is affected by some localised intrusion of urban features around its periphery and within area 8.1b. It does not contain any features of recognised conservation interest and it lacks the sense of remoteness and natural qualities that are found in other parts of the coastal plain. It has the sense of a 'landlocked' piece of countryside and the area's urban context is perceptible even if not dominating. However, area 8.1a does retain a predominantly rural, agricultural character and has a reasonably intact structure of hedgerows and significant tree cover around its periphery that contributes to its aesthetic appeal. The landscape is generally well-managed as agricultural land and in good condition, with limited evidence of 'fringe' uses or influences (e.g. horse paddocks, vacant land, unkempt fencing, fly tipping etc.). Overall, landscape value in area 8.1a is judged as moderate to high while in area 8.1b it is moderate, although the well-treed boundaries are valuable landscape features.

LLCA 8.1 - WOODCOT

LANDSCAPE RESOURCE - SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

The area lacks the very open, expansive character of other parts of the coastal plain (including adjacent land within the strategic gap to the west) but it nevertheless has a relatively open and large-scale character which makes it susceptible to change.

The distinctive character of **area 8.1a** relies on this openness, its rural agricultural character and the absence of prominent urban features, and it would be difficult to accommodate significant new development without affecting these characteristics or altering the balance between a predominantly rural or predominantly urban landscape. So, overall, the sensitivity of the landscape resource within area 8.1a is judged to be high (moderate to high value and high susceptibility to change), with very limited capacity to accommodate development without a significant impact on the integrity of the area's rural, agricultural character.

The existing balance will be affected, however, with the approved construction of the new southern section of Newgate Lane, which will provide a new connection from Newgate Lane to Peel Common Roundabout and a junction and link road to access the existing route of Newgate Lane. The road alignment just clips the extreme south-western corner of area 8.1b but cuts right through the middle of the southern half of area 8.1a and will inevitably introduce further activity, noise and urbanising features into the agricultural landscape, as well as resulting in physical disturbance to land and tree/vegetation cover.

However, the road corridor is relatively narrow and unaffected land within the rest of the area should be of a sufficient scale to remain viable as farmland and to maintain its essentially rural character. Mitigation proposals include new hedgerow and tree planting along the route to reduce its visibility and impact on the landscape and, if this is effective, the road itself may not have an overwhelming urbanising effect across the area as a whole in the longer term. However, significant further development in addition to the road scheme would almost certainly have this effect, potentially tipping the balance towards a predominantly urban character.

The sensitivity of the landscape resource within **area 8.1b** is slightly lower, as its rural character is already influenced by the proximity to built up areas/roads and the development of sports facilities and amenity uses within the area. Despite its more urbanised character, the area nevertheless has some value as part of the Borough's amenity landscape resource (as well as a role in the strategic gap and local GI network, see below) and its essentially open, undeveloped character would be significantly altered by further encroachment of built development. However, strong boundary vegetation would help to limit the influence of development within this area on the more rural landscape of area 8.1a to the south, particularly if located within the smaller northern field which is contained within very strong, well-treed boundaries.



LLCA 8.1 - WOODCOT

VISUAL ENVIRONMENT – SENSITIVITY ASSESSMENT

VIEWS, VISUAL FEATURES AND VIEWERS

Long distance visibility towards the area is low due to the typically low-lying and flat topography of the Borough (including the area itself), and the screening effects of boundary vegetation and surrounding built form. The area may be visible from some local elevated viewpoints (e.g. tall buildings in Fareham) and from higher ground at Portsdown, but from this distant location it forms an insignificant part of a wide panorama of the urban and coastal plain landscape.



Shorter-distance views into the area from built up areas to the north and east are largely filtered through established trees and boundary vegetation or interrupted by built form. Short distance visibility from the east is limited to private views from the rear of properties that back onto the area within the residential suburb of Bridgemary (e.g. Tuke's Avenue, Pettycot Crescent and around Heron Way). Short-distance visibility from the north is also significantly restricted by planting along the southern edge of the retail park, but there are open views through fencing into area 8.1b from the footpath that runs along the northern edge of the sports ground from Newgate Lane. Views of area 8.1a are largely screened from this direction by intervening vegetation.

Views from roads and public places to the south of the area are also very limited but there are some occasional views into the southern end of area 8.1a over or through the hedgerow that runs along Woodcote Lane/Brookers Lane at the far south of the area. Private properties along Woodcote Lane will experience similar views from upstairs windows.

The most significant views are from Newgate Lane which runs along the western side of the area, and from a number of properties along the roadside. Open views across large parts of areas 8.1a and b are possible from much of this length of road, where the roadside hedgerow is absent, gappy or trimmed to a low level. Land further to the east is less visible because of some intervening hedgerows or tree cover within the area.

Most of the available views are across open, undeveloped and relatively attractive countryside, with a strong backdrop of mature trees and limited evidence of built development or other urbanising features. The exceptions to this are views from the southern section of Newgate Lane between Peel Farm and Woodcote Lane, where a foreground of small-scale horse-grazed paddocks with wire fencing, shelters etc lends a fringe character to the view, and views into the sports fields in area 8.1b which have a more suburban character.

Currently, the main viewers are local residents within properties around the immediate periphery of the area, motorists and pedestrians on Newgate Lane and users of the sports facilities, public open space and footpath within area 8.1b. In future, the new alignment of Newgate Lane will increase the extent of the views available to road users, opening up most of area 8.1a to potential views from the road. Roadside planting will mitigate some of these effects but will take time to become effective.



LLCA 8.1 - WOODCOT

VISUAL ENVIRONMENT – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

Overall, visual sensitivity in this area is moderate to high. Although it is screened from longer-distance views, a large proportion of **area 8.1a** is highly visible from short distance views from Newgate Lane to the west, and it is overlooked by a number of properties around its periphery through or over boundary vegetation. The high intervisibility within the area means that these views are quite extensive across the area and they generally have an attractive, unspoilt rural character.

The extent of visibility will be exacerbated, at least over the short term, by the introduction of the new alignment proposed for Newgate Lane. This will open up additional views across the area from the new road and will affect the character of rural views across the area for a period of time. Roadside planting will mitigate some of these effects but will take time to become effective and visual sensitivity of the remaining undeveloped area will remain high.

While road users are only moderately susceptible to change, because of their focus on the road and fleeting nature of views, local residents are likely to be more focussed on the landscape and their surroundings and will be highly susceptible to change. The introduction of further development into the agricultural landscape is likely to have a significant impact on the character and quality of existing predominantly rural views, unless it can be successfully integrated within a substantial framework of new vegetation.

Area 8.1b is slightly less visually sensitive, partly because it benefits from more extensive tree cover around its boundaries, and also because the existing character of the views is already affected by some urbanising influences. Nevertheless, local residents and recreational users of the public open space and PRoW network are highly susceptible to change and will value the existing open, essentially undeveloped character of this recreational landscape. Their visual amenity would be significantly affected by the introduction of built development within this area.



LLCA 8.1 - WOODCOT

SETTING OF URBAN AREA – SENSITIVITY ASSESSMENT

CONTRIBUTION TO SETTING AND SETTLEMENT CHARACTER

The area lies within the lower-lying parts of the Borough, forming part of the coastal plain that slopes gently up to the foot of Portsdown Hill in the far north. While the area does not play a significant role in the topographic setting of the urban area, together with LCA7 to the west it forms part of a swathe of largely undeveloped agricultural landscape that lies between the urban areas of Fareham in the north, Stubbington in the west and Gosport in the east, providing clear visual and physical separation of these settlements. The significant role of the area in separating and preventing coalescence of these settlements is enshrined in policy, with the area designated a Strategic Gap in the Fareham Borough Local Plan.

The visual separation between settlements is apparent in all short distance views into the area from the edge of Fareham to the north, Newgate Lane to the west, Woodcote Lane to the south and in private views from Bridgemary (residential suburb of Gosport) in the east. The substantial vegetation along the northern and eastern boundaries provides strong definition of the edges of the urban areas of Fareham and Bridgemary and marks a clear distinction between town and country (albeit slightly blurred by the amenity uses in the north). This helps to reinforce the separate identity of each settlement and also provides the urban areas with an attractive, essentially rural setting.



The alignment of the approved Newgate Lane South encroaches within the Gap but, in itself, should not fundamentally alter the sense of separation, indeed it may in some ways strengthen it. The lack of roadside development along the new route will reinforce the experience of moving out of Fareham, passing through an area of undeveloped countryside and entering the urban area of Gosport beyond the Peel Common roundabout. Similarly the physical and visual gap across the area between the edge of Bridgemary and Peel Common may be more readily appreciated in views from the road as it passes through the middle of the gap between these two settlements.

The role of the area in separating Stubbington and Gosport is less easily perceived because of intervening development and other features that interrupt views, and occupy land, between the two areas. These include the Newlands Solar Farm, the waste water treatment plant and housing development along the western side of the Newgate Lane corridor at Peel Common. Nonetheless, the area does have a critical role in preventing the coalescence of these areas and this is likely to become more significant with the future redevelopment of land at MCA Daedalus and construction of the Stubbington Bypass to the west, within the existing gap between built areas.

The area does not play a significant gateway role for the Borough as a whole, being some way to south of the M27 and main railway line and therefore not visible from the main approach routes. However, it does provide a strong rural backdrop along Newgate Lane which forms part of a key approach into the Borough from Gosport District to the south via the B3334. This reinforces the sense of moving between settlements and districts.

Overall, **area 8.1** plays an important role in defining the edges, separate identity and settings of Fareham and Gosport and a critical role in preventing their coalescence. It also makes an important contribution to the swathe of landscape that currently separates Stubbington from Gosport, a role that may become more critical to maintain with the redevelopment of the MCA Daedalus site in future years.

LLCA 8.1 - WOODCOT

SETTING OF URBAN AREA – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

Given the area's designation as part of the Strategic Gap and the role it plays in preventing coalescence between the settlements of Fareham, Stubbington and Gosport, the area is highly sensitive to change. The landscape lacks any strong landform feature (e.g. ridges or valleys) or a mature framework of woodland that could potentially contain and provide a strong landscape edge to any major extension of built form into this area. Intrusive development within the area would inevitably erode the visual and physical separation that currently exists and potentially alter the character of the landscape settings of the two settlements from predominantly agricultural to predominantly urban. Ultimately, the function and integrity of the area as farmland could be significantly eroded to the point where the gap becomes a corridor of greenspace between urban areas, or an 'urban park', rather than a functioning area of agricultural landscape with a distinct character and identity.

The proposed new bypass could potentially erode the integrity of the existing gap if it is regarded as forming a potential new edge for development. If the rural, undeveloped and open character of this area is to be maintained, it will be crucial to keep the urban boundaries as tightly drawn as possible and avoid infilling the land between the existing urban edges and the new road. Overall, therefore, there is very limited scope to accommodate development without a significant impact on the integrity of the area's rural, agricultural character and the role it performs in maintaining the separate identity and character of the settlements and their landscape settings.



LLCA 8.1 - WOODCOT

GREEN INFRASTRUCTURE – SENSITIVITY ASSESSMENT

CONTRIBUTION TO GREEN INFRASTRUCTURE NETWORK

This area does not support a wide range of GI assets in terms of biodiversity or landscape features (there are no designated features) but the area as a whole does make a contribution to the local GI network as an extensive area of undeveloped greenspace between the urban areas of Fareham and Gosport, albeit with limited public access. The tree lined boundaries and reasonably intact structure of hedgerows provide a valuable framework of vegetation within this large-scale, intensively managed landscape and the playing fields, public open space and footpath within area 8.1b are valuable recreational assets for local people. The footpath along the northern edge of the area and Woodcote Lane/Brookers Lane in the south provide east-west access links between the residential suburbs of Gosport across the strategic gap to Stubbington and beyond to the Meon Valley. There are no other PRoW or access routes across or within area 8.1a.

The PUSH GI strategy identifies a sub-regional scale blue corridor following the drainage network that runs through the western side of the area southwards to join the River Alver (within Gosport District). The strategy includes a project (C7) to strengthen wildlife corridors connected to the River Alver but this is focused on the Alver Valley outside of the Borough. The Fareham GI strategy does not identify any specific projects within the boundary of this area.



LLCA 8.1 - WOODCOT

GREEN INFRASTRUCTURE – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

The area's GI value lies in its largely open, undeveloped nature, the public open space at Speedfields Park and the functional connections between Newgate Lane and Bridgemary provided by the public footpath to the north and Woodcote Lane to the south. The area is moderately sensitive to change. Any development that compromised the PRoW network or the sense of openness and being 'in the countryside' would have an adverse effect on the GI network.

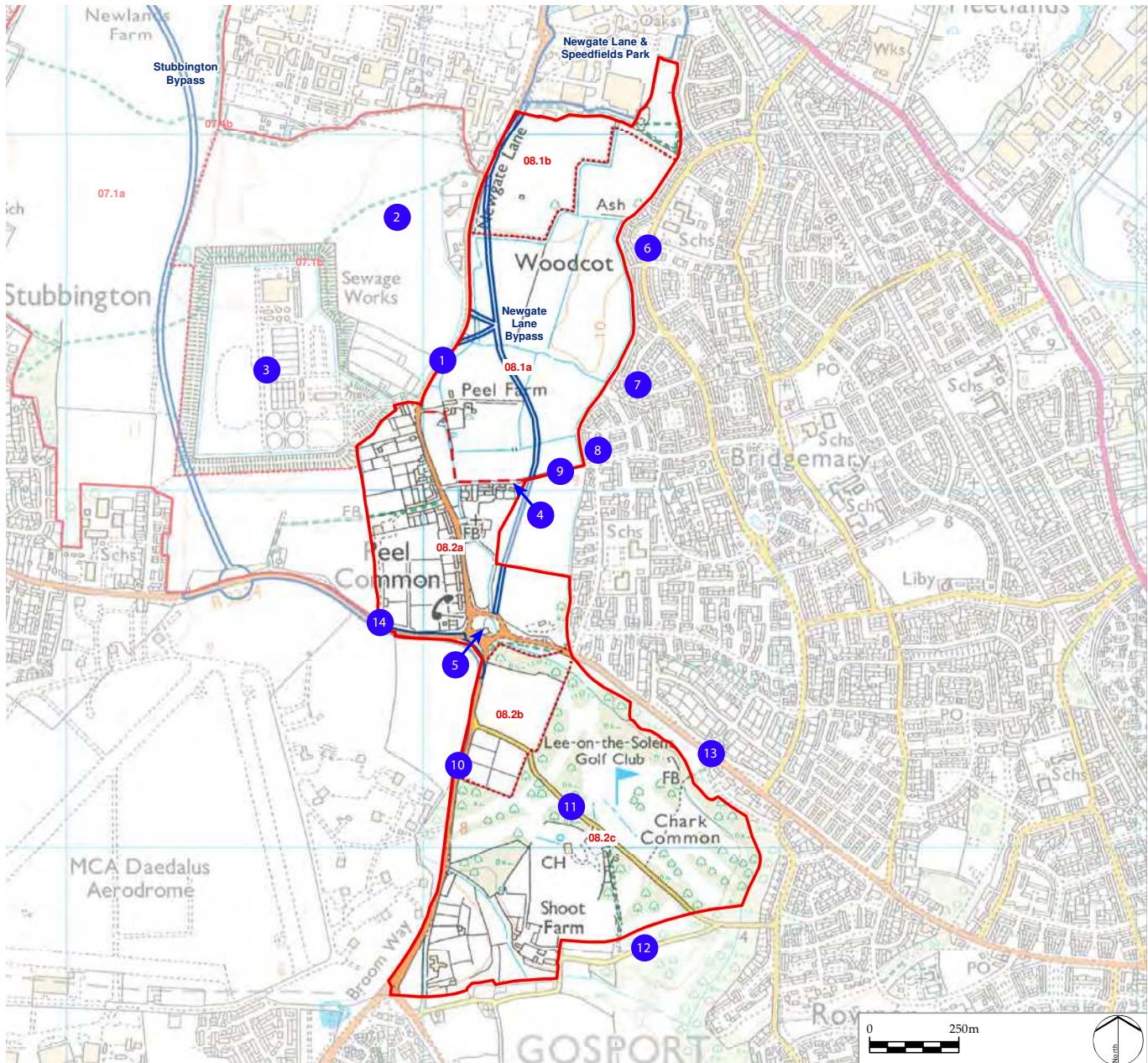
This area would benefit from improvements and extension of the local GI network, through major investment in the reinstatement or creation of hedgerows, woodlands and other habitats that have been lost or damaged by agricultural intensification, and through the extension of public open space or access connections through the area.

The main impacts of new road on GI resources are its potential interference with the east-west footpath link between Bridgemary and Peel Common that crosses the area along Woodcote/Brookers Lane, the loss of small areas of amenity space within the Speedfields Park and Brookers Field Recreation Grounds and the loss of some trees and hedgerow vegetation along the road alignment. Mitigation proposals will offset much of this impact.



LLCA 8.1 - WOODCOT

LOCATION PLAN FOR ROADS AND OTHER FEATURES



LEGEND

	Landscape Character Area	1	Newgate Lane (B3385)	8	Heron Way
	Local Landscape Character Area	2	Newlands Solar Farm	9	Brookers Lane
	Local Landscape Character Area Subdivision	3	Peel Common Waste Water Treatment Works	10	Broom Way (B3385)
		4	Woodcote Lane	11	Brune Lane
		5	Peel Common roundabout	12	Shoot Lane
		6	Tuke's Avenue	13	Rowner Road
		7	Pettycoat Crescent	14	Gosport Road (B3334)

LLCA 8.1 - WOODCOT

DEVELOPMENT CRITERIA AND ENHANCEMENT OPPORTUNITIES

As a whole, this area is of high sensitivity primarily on account of its critical role in preventing the coalescence of the urban areas of Fareham, Bridgemary and, to a lesser extent, Stubbington, and in defining the edges, setting and separate identity of these settlements. The relatively small size of the area, the high degree of intervisibility and its generally unspoilt, rural character make it particularly vulnerable to change. The generally open nature of the landscape means that it is difficult to integrate development without it being highly visible and potentially affecting the rural undeveloped character across a wide area, as well as eroding the physical, visual and perceived gap between settlements. The situation is further complicated by the proposed new road which will have some effect on the integrity and character of the landscape resource and undeveloped gap. Even a small amount of encroachment of further built development within the area could exacerbate these effects to the point at which the character of the whole area may be fundamentally altered.

There may be potential for some modest, small scale development associated with existing recreational land uses and built form within area 8.1b, as long as it is closely related to existing features and can be successfully integrated within the existing structure of hedgerows and trees without altering the essentially 'undeveloped' character of the amenity landscape or the wider agricultural landscape of area 8.1a.

In order to protect and enhance the character and quality of landscape resources, views and visual amenity, urban setting and green infrastructure, development proposals will need to:

- Protect the open, predominantly agricultural and undeveloped, rural character of area 8.1a;
- Maintain and strengthen the existing structure of trees, hedgerows and other mature vegetation, to maximise its landscape and wildlife value and to minimise impacts on the rural character of the landscape;
- Maintain the essentially open, undeveloped character of the public open space, playing fields and sports facilities within area 8.1b, and be designed to relate closely to the existing structure of trees hedgerows and existing characteristic built features within the area;
- Avoid any major incursion of the urban area into the countryside beyond existing well-defined boundaries, or create significant new pockets of urban or urbanising development within open farmland;
- Protect the area's role in maintaining the separation of settlements and a clear distinction between urban and rural areas. In particular, avoid ribbon development strung out along road corridors (e.g. along the existing and proposed new alignment of Newgate Lane) and any development beyond the existing urban edge that cannot be successfully integrated within the existing landscape structure and which could affect the visual, physical or perceived integrity of the strategic gap;
- Maintain significant distance and separation from the corridor of the new road to minimise its urbanising effects upon the rural character of the area;
- Avoid the introduction of tall buildings or structures that would be particularly visually prominent within the open, flat landscape;
- Protect and enhance enjoyment of the landscape by maintaining and enhancing the existing areas of public open space and access network, and by making further provision for accessible greenspace and access links within and across the area;
- Provide substantial new investment in the landscape through extensive tree, hedgerow and woodland planting using native broadleaved species appropriate to the locality and soil conditions and habitat creation to diversify the intensively farmed landscape;
- Demonstrate design that has minimal impact on the surrounding landscape and is in keeping with the character of the local landscape context.

LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

LANDSCAPE RESOURCE - SENSITIVITY ASSESSMENT

LANDSCAPE CHARACTER, QUALITY AND VALUE

Landscape character, quality and value

This area forms the southern part of the Woodcot-Alver Valley LCA and the south-eastern part of the wider Stubbington–Fareham Strategic Gap. The area forms part of the flat, low-lying coastal plain but is very different in character and scale from the open agricultural landscape to the north and west. It is characterised by a mixed pattern of wooded common, small-scale pasture and ribbon development along the corridors of the River Alver and Newgate Lane and is bounded to the east by the urban edge of Gosport, to the west by the Daedalus airbase, to the north by the Peel Common Waste Water Treatment Works and arable farmland, and to the south by the open amenity land of the Alver Valley.

Area 8.2a comprises a strip of land on either side of Newgate Lane, extending from Peel Farm in the north to the Peel Common roundabout in the south. To the west of the road, the area is occupied by residential ribbon development backed by gardens and a small-scale pattern of fields, paddocks and other plots of land, contained by strong boundary vegetation to the rear. The eastern side of the road is characterised by a similar patchwork of small-scale, horse grazed pastures, built development south of Woodcote Lane (including housing, church and care home), gardens and small parcels of land enclosed by woodland, trees and hedgerows. In the far south-east corner is an area of public open space, including sports pitches and associated buildings. The character of this corridor is significantly affected by the influence of busy roads, street lighting, built development and other urban land uses, while the management of the small-scale pastures and plots of land - with their associated rather ramshackle fencing and structures - lends a distinct fringe character to the remaining unbuilt landscape. This situation will be exacerbated by the construction of the proposed new Newgate Lane-Peel Common bypass which will further fragment and intrude upon areas of undeveloped landscape. Overall landscape quality is therefore substantially degraded although the strong structure of vegetation that encloses this area is of some landscape value.

On the southern side of the Peel Common Roundabout lies Chark Common, which marks a distinct change in character from the open arable landscape of the northern part of the Woodcot-Alver Valley LCA, to a landscape which is strongly enclosed by extensive cover of woodland and trees, within which small-scale fields or open spaces are seemingly ‘carved out’ from the woodland cover. Within the overall area, **area 8.2b** is distinctive in that it forms a relatively large, regularly shaped parcel of open land, divided into smaller horse-grazed paddocks by fencing. This area shares some of the fringe characteristics of the roadside paddocks further north (e.g. fencing, land management, structures etc) but has a less urbanised context and is framed by a strong, attractive backdrop of woodland, mature trees and hedgerows. Its quality is less degraded and it retains a semi-rural character.

The remainder of the Chark Common area (**area 8.2c**) is dominated by the Lee-on-Solent Golf Course, which extends across the majority of the area, excluding the far south-west corner (comprising fields in use for horse-grazing along with former farm buildings converted for residential use). The landscape is characterised by open areas of grassland, heathland and wetland habitats (associated with the River Alver) contained within a strong structure of woodland belts, copses, mature trees and scrub. Parts of the land are intensively managed as part of the golf course (e.g. greens, fairways, bunkers etc.) and there are associated buildings and structures, which have an amenity character that somewhat detracts from the rural character of the landscape. However, most of the area is designated as a SINC (for its woodland, heathland and wetland habitats) and retains an attractive, enclosed and well-treed character with some ‘semi-natural’ qualities. The strong tree cover also provides an effective buffer to the influence of surrounding roads and neighbouring development within Gosport. The area is generally unspoilt and of relatively high landscape quality although it is not covered by any current national or local landscape designation.

LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

LANDSCAPE RESOURCE - SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

The sensitivity of the landscape resource varies within this overall area. **Area 8.2a** is already substantially degraded by urban influences and has a predominantly 'fringe' character which reduces its sensitivity to change. This will be exacerbated by the construction of the proposed bypass. Further development within this area would further erode the extent of surviving 'undeveloped' land but would not have a significant effect upon the overall character and quality of the landscape resource. Notwithstanding its value as part of the strategic gap or other roles, in landscape resource terms alone this area has relatively low sensitivity and high development potential.



Area 8.2b also has fringe qualities but has not been degraded in the same way. It retains an essentially rural, pastoral character that is susceptible to change and would be significantly affected by the introduction of permanent built development. The area is physically and visually detached from other built form by the strong surrounding woodland framework and significant development would appear as an isolated area of built land within open countryside. A section of the western boundary along Broom Way is open and there is a visual relationship between the area and currently undeveloped land within the Daedalus site to the west which would also be affected by development within this area. Redevelopment proposals for the Daedalus site may change the situation but current indications suggest that the undeveloped 'green' character of this corner of the site is to be maintained. Overall, therefore, landscape sensitivity is judged as moderate to high and the potential for development is low.

Area 8.2c is highly sensitive to change. Although its use as a golf course has altered the underlying character of the landscape it nevertheless has an attractive wooded and enclosed character and supports a mosaic of other habitats and features of landscape and ecological value. Built development would undoubtedly intrude upon its quiet, semi-rural and secluded character. There may be some modest potential for accommodating small-scale development (i.e. individual buildings) within the south west corner of the area, where it is associated with existing built form and can be more successfully integrated within the existing vegetation structure, but otherwise there is very limited potential for development within the area.

LLCA 8.2 – PEEL COMMON AND ALVER VALLEY

VISUAL ENVIRONMENT – SENSITIVITY ASSESSMENT

VIEWS, VISUAL FEATURES AND VIEWERS

The area's low lying position within the coastal plain means that there are few long distance views. The area may be perceived as one part of a much wider panorama taking in the urban and coastal landscapes in views from higher ground to the north of the Borough. However, its small size and lack of landmark features means the area is generally indistinguishable from the wider landscape within long-distance views.

More locally, large parts of **area 8.2a** are visible from roads, adjacent dwellings, lanes, public rights of way and open spaces within the area itself, although there are some small pockets of land enclosed behind built form and strong boundary vegetation that are less visible from public areas. The character and quality of the available views is already heavily influenced by urban characteristics and would not be fundamentally altered by additional built development.

Area 8.2b is largely enclosed within a strong wooded framework which restricts its visibility from surrounding areas but it is open along parts of its western boundary, allowing some direct views from adjacent Broom Way. There are also occasional filtered glimpses through the roadside trees along Brune Lane, which cuts through the middle of this area. Given that the main viewers will be road users, the visual sensitivity of this area is moderate and could be reduced further by mitigation planting to close the gap along the western boundary, although this will take time to become effective.

Area 8.2c is generally of low visual sensitivity. The extensive cover of trees and woodland around and within the area prevent all but glimpsed views from surrounding roads, through trees and gaps in the boundary vegetation. There are no views from neighbouring urban areas to the east. There is a public footpath that cuts through the golf course, linking Shoot Lane with Brune Lane, and another sort section of footpath into the area off Rowner Lane on the northern side of the area, otherwise there are no other publicly accessible viewpoints in this area.

The main viewers of this area are therefore local residents within Peel Common (area 8.2a), users of the main road network (Newgate Lane, Broom Way) and minor local lanes (Brune Lane, Shoot Lane), users of the limited network of PRoW and open spaces, and golf course members. Apart from some attractive views within area 8.2c, the value of the landscape as a visual resource for these receptors lies primarily in its character as undeveloped land rather than its intrinsic scenic quality.



© Barry Shimmmon

LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

VISUAL ENVIRONMENT – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

Visual sensitivity is relatively low within this area. Area 8.2a is highly visible but the character of the views is such that further development is unlikely to have a major impact on visual amenity. Area 8.2b is visually well-contained apart from a section of its western boundary, but this visual exposure could be mitigated by additional planting to close the gap. Likewise, area 8.2c is also highly visually contained by the extensive cover of trees and woodland within and around the area, with very limited publicly accessible views. However, balanced against this is the relatively unspoilt character of the views in the Chark Common area which are highly susceptible to change, and the high level of sensitivity of people using the PRoW network (albeit very restricted) and otherwise accessing the area for recreational purposes, who appreciate their surroundings and will be very aware of changes.

Across much of the area, therefore, there are limited opportunities to integrate development into the visual environment without unacceptable adverse effects on the character and quality of existing views and on the visual amenity of sensitive viewers. However, there may be some modest scope for accommodating small-scale development (i.e. individual buildings) within less visible, well-contained pockets of land within areas 8.2a and in the south-western corner of area 8.2c, where the existing vegetation structure has the potential to limit effects on high quality views and visual amenity.



LLCA 8.2 – PEEL COMMON AND ALVER VALLEY

SETTING OF URBAN AREA – SENSITIVITY ASSESSMENT

CONTRIBUTION TO SETTING AND SETTLEMENT CHARACTER

The area lies within the lower-lying parts of the Borough, forming part of the coastal plain that slopes gently up to the foot of Portsdown Hill in the far north. While the area does not play a significant role in the topographic setting of the urban area, together with LCA7 to the west (and area 8.1 to the north) it forms part of a swathe of largely undeveloped landscape that lies between the urban areas of Fareham in the north, Stubbington in the west and Gosport in the east, providing clear visual and physical separation of these settlements. The significant role of the area in separating and preventing coalescence of these settlements is enshrined in policy, with the area designated a Strategic Gap in the Fareham Borough Local Plan.

The role of **area 8.2a** as part of the gap is evident to the east of Newgate Lane, where the strip of roadside paddocks forms part of a wider corridor of undeveloped landscape between the road and the western edge of Bridgemary. However, the role of this area in maintaining the gap westwards towards Stubbington is less easy to perceive from the Newgate Lane corridor as views in this direction are blocked by built development along the roadside at Peel Common. Nevertheless, when viewed from the west (from the Gosport Road) it becomes apparent that Peel Common is an isolated small settlement that lies within the wider gap, rather than defining its western boundary or connecting to a larger urban area. It will be vital to maintain this 'isolation' of development at Peel Common if the physical and visual integrity of the wider gap is to be maintained.

The Peel Common Roundabout is a critical 'pinch point' within the gap between Peel Common and the edge of Bridgemary where there is a real risk of the two areas coalescing. This will be further exacerbated by the new bypass which eats into the remaining undeveloped land to the north of the roundabout and also, potentially, by redevelopment of the Daedalus site to the south. It will be vital to protect the undeveloped landscape within the public open space to the east of the roundabout in order to maintain a physical, visual and perceptual gap between the built areas.

Areas 8.2b and c also play a pivotal role in maintaining separation of urban areas and as a link between the upper and lower parts of the Alver Valley corridor. This triangle of semi-rural, heavily wooded landscape is important not only in physically and visually separating built areas at Peel Common and Bridgemary but also in separating Bridgemary from the northern edge of Lee-on-the-Solent. The redevelopment of MCA Daedalus may potentially exacerbate the perceived closing of the gap between Lee-on-the-Solent and Peel Common. It will be essential, therefore, to maintain the undeveloped character of all sides of this triangle, avoiding encroachment of development along Broom Way, Shoot Lane and Gosport Road.

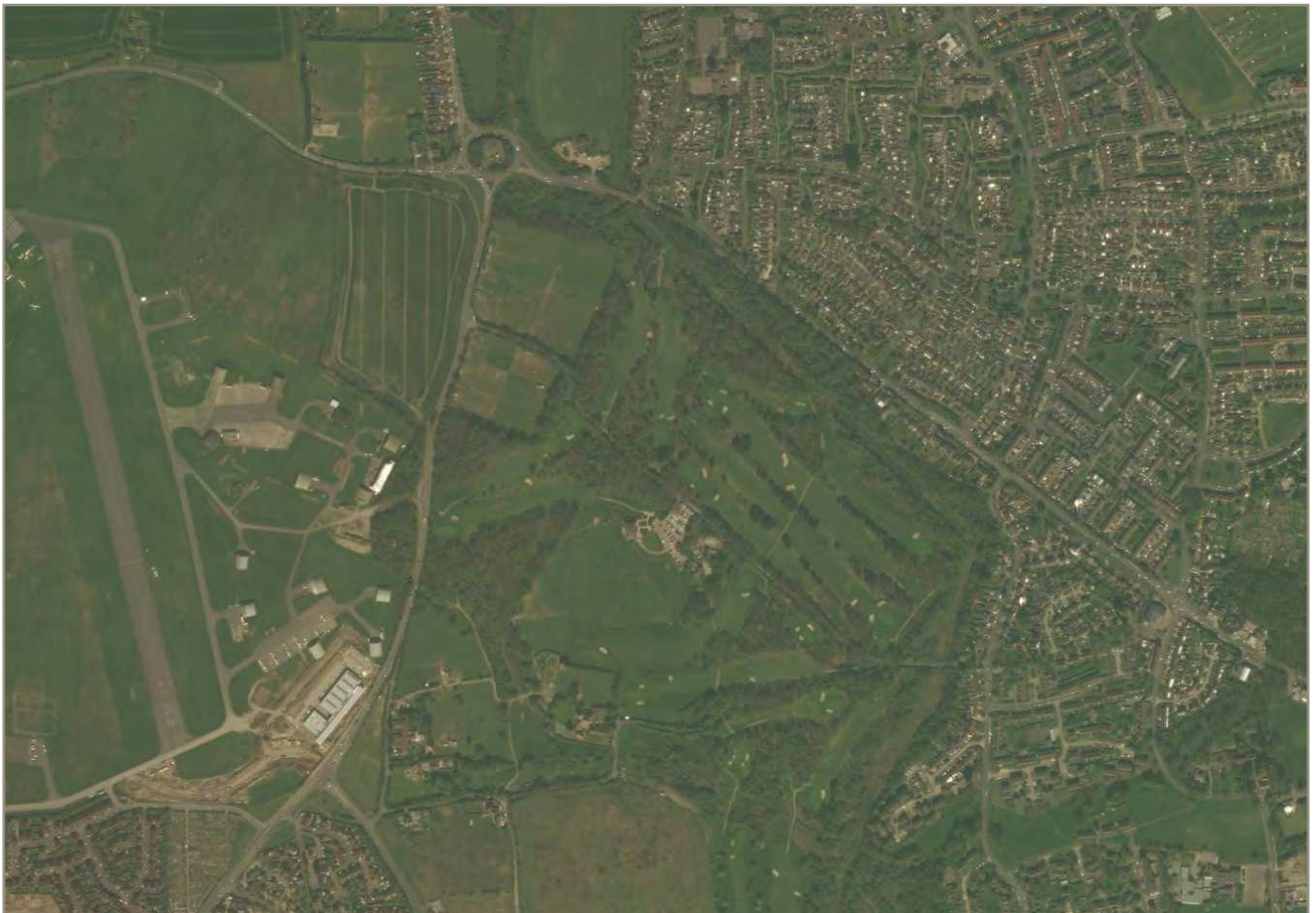
This southern area also forms a vital link in the wider Alver Valley landscape corridor which extends southwards into Gosport District to the coast, providing a distinct edge and landscape setting to the urban areas to the south. It will be very important to maintain the integrity of this continuous corridor of undeveloped landscape and avoid the encroachment of development within and across it.

LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

SETTING OF URBAN AREA – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

Given the area's designation as part of the Strategic Gap and the role it plays in preventing coalescence between the settlements of Fareham, Stubbington, Bridgemarky and Lee-on-the-Solent, the area is highly sensitive to change. The area also contributes to the perceived sense of separation between Gosport District and Fareham Borough. Any development that reduced the physical or visual separation between these settlements would have an adverse effect on the integrity of the gap and on the area's contribution to the distinct identity and settings of the surrounding urban areas. Consequently, the area offers very limited development potential in respect of its role in maintaining the separation and setting of settlements. The only opportunities may lie within areas that are closely associated with existing development (e.g. at Peel Common or in the SW corner of area 8.2c) and can be integrated within the landscape without any physical or perceived encroachment within the gap.



LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

GREEN INFRASTRUCTURE – SENSITIVITY ASSESSMENT

CONTRIBUTION TO GREEN INFRASTRUCTURE NETWORK

The area's main contribution to the GI network is through its role as an extensive area of undeveloped land between the urban areas of Fareham and Gosport and, in particular, as part of the wider corridor of greenspace and habitats that follow the course of the River Alver, identified within the PUSH GI strategy as a 'sub-regional scale blue corridor'. The strategy includes a project (C7) to strengthen wildlife corridors connected to the River Alver but this is focused on the Alver Valley outside of the Borough.

The northern part of the area (8.2a) does not support a wide range of designated GI assets but the framework of mature hedgerows and trees and the playing fields to the east of the Peel Common Roundabout are all valuable GI resources in this urbanised area. Woodcote Lane and the footpath linking Newgate Lane with Gosport Road also provide a valuable access link connecting Bridgemary with Stubbington across the middle of this area.

The southern part of the area (**areas 8.2b and c**) contains significant biodiversity assets in the extensive woodland, grassland, heathland and wetland habitats (designated as a SINC) within the golf course and surrounding area but is relatively inaccessible to the public, with only three short lengths of public footpath and no public open space. An extension of public access in this area, particularly along the river corridor to link with the Alver Valley Country Park to the south (in Gosport District) would be desirable. The Fareham GI strategy identifies project BW14 which aims to create 'cross boundary links from South Fareham Gap and Daedalus to the Alver valley Country Park' and 'to provide a linear corridor between Stubbington, Lee-on-the-Solent and Gosport'.



LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

GREEN INFRASTRUCTURE – SENSITIVITY ASSESSMENT

SENSITIVITY AND DEVELOPMENT POTENTIAL

The area's primary GI value lies in its largely undeveloped nature and the extensive network of woodland, grassland, heathland and wetland habitats within the corridor of the River Alver and within Chark Common in the south of the area. These assets are particularly scarce and valuable within the heavily urbanised and pressured context of this part of the Borough and are therefore very sensitive to change.

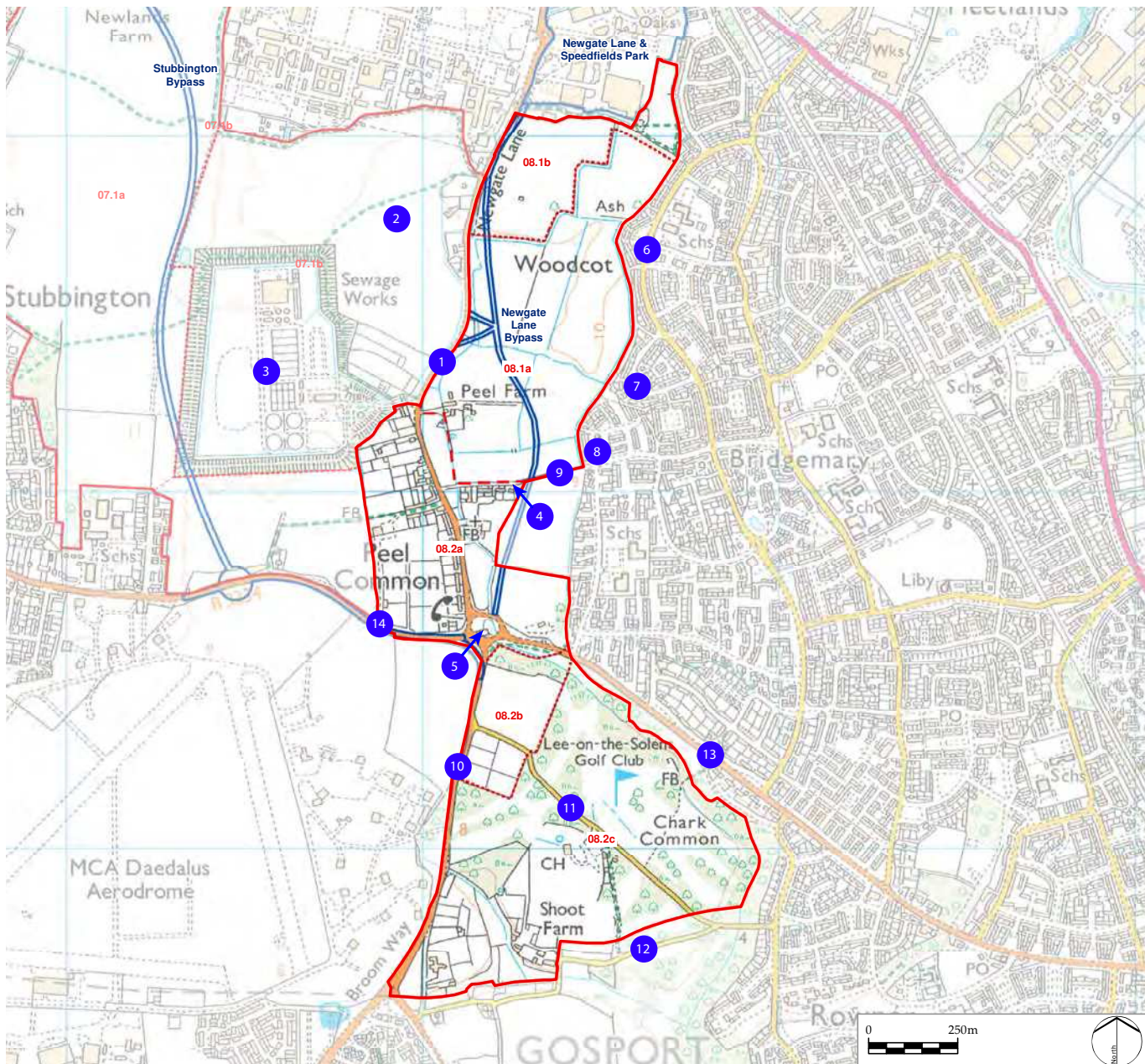
The existing network of public access an open space is fairly sparse within the area and existing features need to be protected and their function and quality enhanced. The area would benefit from improvements to the local access network to provide improved east-west links between urban areas and the wider access network of the coastal plain, and north- south links to connect the northern part of the river corridor with the Alver Valley Country Park and the coast.

Any new development would need to maintain the largely 'undeveloped' character of the area, ensure the protection of features of landscape or biodiversity value, and maintain and extend the provision of access and public open space opportunities. There is very limited scope for this to be achieved in this highly constrained area.



LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

LOCATION PLAN FOR ROADS AND OTHER FEATURES



LEGEND

- | | | | | | |
|--|--|--|---|--|-------------------------|
| | Landscape Character Area | | 1 Newgate Lane (B3385) | | 8 Heron Way |
| | Local Landscape Character Area | | 2 Newlands Solar Farm | | 9 Brookers Lane |
| | Local Landscape Character Area Subdivision | | 3 Peel Common Waste Water Treatment Works | | 10 Broom Way (B3385) |
| | | | 4 Woodcote Lane | | 11 Brune Lane |
| | | | 5 Peel Common roundabout | | 12 Shoot Lane |
| | | | 6 Tuke's Avenue | | 13 Rowner Road |
| | | | 7 Pettycoat Crescent | | 14 Gosport Road (B3334) |

LLCA 8.2 - PEEL COMMON AND ALVER VALLEY

DEVELOPMENT CRITERIA AND ENHANCEMENT OPPORTUNITIES

As a whole, this area is of high sensitivity primarily on account of its critical role in preventing the coalescence of the urban areas of Fareham, Bridgemary, Lee-on-the-Solent and, to a lesser extent, Stubbington, and in defining the edges, setting and separate identity of these settlements. The narrowness of the gap between development at Peel Common and the edge of Bridgemary means that this area has a particularly vital role in maintaining physical, visual and perceived separation and even a limited amount of development in the 'wrong' place, particularly along the main roads that enclose the southern part of the area, could threaten the integrity of the gap. The situation is further complicated by the proposed new bypass which will inevitably have some effect on the integrity and character of the landscape resource and undeveloped gap and further 'squeeze' the gap at its narrowest point.

Other key sensitivities include the important range of habitats within the Chark Common area and the area's contribution to the corridor of undeveloped greenspace (albeit largely inaccessible) along the course of the River Alver, from Fareham to the Alver Valley Country Park and beyond to the coast.

There may be potential for some modest, small scale development associated with existing built form at Peel Common or in the far south-west of the area, as long as it is closely related to existing features and can be successfully integrated within the existing structure of hedgerows and trees without altering the essentially 'undeveloped' character of the landscape or threatening the integrity of the gap.

In order to protect and enhance the character and quality of landscape resources, views and visual amenity, urban setting and green infrastructure, development proposals will need to:

- Safeguard the area's vital role in maintaining the separation of settlements and a clear distinction between urban and rural areas. In particular, avoid ribbon development along road corridors (e.g. Broom Way, Shoot Lane and Gosport Road) and any development beyond the existing urban edge that cannot be successfully integrated within the existing landscape structure and which could affect the visual, physical or perceived integrity of the strategic gap;
- In particular, protect and strengthen the undeveloped character of the public open space to the east of the Peel Common roundabout;
- Maintain the distinctly 'isolated' nature of settlement at Peel Common and ensure that any potential small-scale infill development within this area effectively 'rounds off' rather than extends the settlement boundary, to avoid the risk of physical or perceived coalescence with other built areas;
- Protect the semi-rural, undeveloped character of areas 8.2b and c;
- Maintain and strengthen the existing structure of woodland, trees, hedgerows and other mature vegetation in all parts of the area, to maximise its landscape and wildlife value;
- In particular, maintain and enhance the mosaic of woodland, heathland, grassland and wetland habitats of value within the Lee-on-the-Solent golf course at Chark Common and encourage further habitat creation and diversification within intensively managed areas to maximise wildlife and landscape value;
- Avoid the introduction of tall buildings or structures that would be particularly visually prominent within the landscape;
- Protect and enhance enjoyment of the landscape by maintaining and enhancing the existing areas of public open space and access network, and by making further provision for accessible greenspace and access links within and across the area, particularly along the River Alver corridor and with the Country Park to the south;
- Demonstrate design that has minimal impact on the surrounding landscape and is in keeping with the character of the local landscape context.
- Use native broadleaved species appropriate to the locality and soil conditions in new tree and hedgerow planting.

APPENDIX FL&BH 1.2.2

COMPOSITE LANDSCAPE STRATEGY

**KEY**

-  Site boundary
-  Existing trees/vegetation to be retained
-  Existing drainage
-  Existing public rights of way
-  Newgate Lane relief road Southern Section (Currently under construction)
-  Proposed development cells and units
-  Proposed key frontages
-  Proposed secondary frontages
-  Proposed buffer planting to eastern and southern boundaries
-  Proposed tree planting
-  Proposed feature tree planting
-  Proposed hedgerows
-  Proposed footpaths
-  Proposed attenuation area
-  Proposed play areas
-  Continuity of green infrastructure connections to the Alker Valley
-  Direct connection to existing settlement pattern

Land at Newgate Lane, (North) and Land at Newgate Lane (South) Fareham, Hampshire
Fareham Land LP and Bargate Homes LP

Appendix FL&BH 1.2.2 Composite Landscape Strategy

Drawing Ref: BRS.4989

Date : 26/10/2020
Drawn by : NF
Checked by: JWA
Scale : 1 : 1250 @ A1

APPENDIX FL&HB 1.2.3
EXTRACT FROM THE
'TECHNICAL REVIEW OF AOSLQ AND STRATEGIC GAPS'

Technical Review of Areas of Special Landscape Quality and Strategic Gaps

supporting document for Fareham Local Plan
Development



Client: Fareham Borough Council
Consultant: Hampshire County Council
22nd September 2020

Rev	Date	Revisions
-	28 th April 2020	First Draft issued for comment.
A	31st July 2020	2 nd Draft Issued for comment. Revisions to ASLQ. Addition of SG and Info. to Appendix on Refs and Maps. Responses to Clients comments
B	2 nd Aug 2020	3 rd Draft. Additional Photos and References added. Additional text on SCG.
C	7 th Aug 2020	Text edits.
D	30th Aug 2020	Text edits.
E	17 th Sept 2020	Text and Map edits.
F	22 nd Sept 2020	Minor text errors and map adjustments

Landscape Team
Economy, Transport and Environment
EII Court West
The Castle
Winchester
Hampshire
SO23 8UD



Cover Photograph: Meon Shore, at edge of Chilling-Brownwich Coastal Plain, Photo: Charlotte Webb, June 2020.

Contents

Executive Summary	page 5
Chapter 1: Introduction and Methodology	page 9
Chapter 2: Planning Policy Context	page 27
Chapter 3: Areas of Special Landscape Quality	page 49
• Areas of Special Landscape Quality Overview	page 50
• ASLQ 1: Upper Hamble Valley	page 57
• ASLQ 2: Lower Hamble Valley	page 60
• ASLQ 3: Hook Valley	page 63
• ALSQ 4: Meon Valley	page 66
• ASLQ 5: Forest of Bere and North Fareham Downs	page 69
• ASLQ 6: Portsdown Hill	page 72
• ASLQ 7: Chilling-Brownwich Coastal Plain	page 75
• ASLQ 8: Cams to Portchester Coast	page 78
• ASLQ Conclusions and Recommendations	page 81
Chapter 4: Strategic Gaps	page 82
• Strategic Gaps Overview	page 83
• SG 1: Meon Valley	page 88
• SG 2: Land between Fareham and Stubbington	page 96
• Strategic Gaps Conclusions and Recommendations	page 106
Chapter 5: Summary Conclusions and Recommendations	page 110
Appendices	page 114
Appendix 1: References	page 115
Appendix 2: Bibliography	page 117
Appendix 3: Relevant Plans	page 120
Appendix 4: Summary of ASLQ Case Studies for establishing Methodology	page 128
Appendix 5: Detailed Strategic Gap Study Area Analysis (separate document)	

Page left intentionally blank

Executive Summary

Fareham Borough Council is in the process of producing a new Local Plan to address housing, employment and retail development requirements across the Borough up to 2037. Once adopted, the new Local Plan will replace the adopted Local Plan Part 1 (Core Strategy) and Local Plan Part 2 (Development Sites & Policies).

To support Local Plan development, Fareham Borough Council commissioned the Landscape Team, in Hampshire County Council, to undertake a technical review of:

- six proposed Areas of Special Landscape Quality (ASLQ).
- two proposed Strategic Countryside Gaps: Meon Gap and between Fareham and Stubbington.

Fareham Borough Council's recent past experience in the determining of two planning applications, identified the need to address the 'valued landscapes' of Fareham.

"Two recent planning appeal decisions demonstrated how the argument of valued landscapes could help to determine planning decisions. Both decisions were on sites located in the Lower Meon Valley (Land west of Old Street, Stubbington and Land east of Posbrook Lane, Titchfield) and the Inspectors recognised the high-quality landscape concluding that the Lower Meon is a valued landscape.

...with this in mind, the Council proposed the designation of valued landscapes as part of the Draft Local Plan Update consultation in the summer of 2019."(page 27, Fareham Draft Local Plan 2036)

There was also the need to clarify the role that Strategic Gap designation plays within planning policies in the Countryside, and establish the clear difference between a policy that addresses landscape quality and a policy that addresses the prevention of coalescence of settlements with separate identities, as:

"...Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities." (page 27, Fareham Draft Local Plan 2036)

This technical review is published at the Regulation 19 stage to support the proposed designations.

The technical review undertaken during March to July 2020, reviewed recent relevant documents and developed an appropriate and concise methodology for determining Areas of Special Landscape Quality (or ASLQ), based primarily on criteria from the Guidelines for Landscape and Visual Impact Assessment (GLIVIA) 3rd Edition, Box. 5.1, supported by other examples of good practice and case law.

As there is no standard national guidance on Strategic Gap determination, a methodology and set of criteria were established for determining Strategic Gap characteristics and boundaries through review and analysis of pertinent recent Strategic Gap proposals developed for other Local Plans and through Fareham Borough Council's own Strategic Gap history.

Executive Summary

The resultant analysis and site surveys of all Fareham Borough's Landscape Character Areas concludes that:

- The six proposed ASLQ put forward for designation in the Fareham Local Plan Supplement (Reg 18 consultation document, Jan-March 2020), can be considered as 'valued landscapes' as they scored highly against the assessment criteria and therefore should be identified for ASLQ designation in the Fareham Local Plan 2037, with some modifications made to boundaries, to bring them into line with the current Fareham Borough Landscape Character Assessment 2017, but also;
- Through this process, two further landscape character areas in Fareham Borough were identified as having equivalently 'valued landscape' characteristics and so it is recommended that Chilling-Brownwich Coastal Plain and parts of the Cams to Portchester Coast should also be designated.
- Conservation Areas where they sit in or adjacent to a proposed ASLQ should be included as part of the ASLQ because of their mutually supportive relationship.

The resultant analysis and site surveys of the two Strategic Gaps, conclude that:

- The Meon Strategic Gap is proposed for continued designation, having both strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence, that could result from continued pressure for expansion of the Western Parishes; North and West Fareham, and from pressure for the expansion of Stubbington.
- One moderate amendment is proposed to the North Eastern corner of the Meon Gap; that is an extension to the Gap around Funtley to prevent Funtley from coalescing with North and West Fareham.
- The Fareham-Stubbington Strategic Gap is proposed for continued designation, also having strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence through continued and heavy pressure for Southern expansion of Fareham and Northern and Eastern expansion of Stubbington, but it is considered that there are some opportunities for development to be accommodated within the landscape, without compromising the Strategic Gaps function.

Executive Summary

Possible adjustments to the Fareham-Stubbington Strategic Gap could be considered in the following locations:

- An area to the South of Fareham, and west of HMS Collingwood, as some development in this area could be visually absorbed into the Gap without compromising the Gap function.
- An area to the north west of Stubbington south of Oakcroft Lane and east of Ranvilles Lane, as some development could be visually and physically absorbed into the Gap without compromising the Gap function.

It is also noted that the Newgate Lane Area (Newgate Lane West and East from Fareham to Peel Common Roundabout) has undergone a significant amount of change in the recent past.

In order to develop appropriate Green Infrastructure mitigation and enhancement associated with the areas of recent and future change described above, in the Fareham-Stubbington Gap, Green Infrastructure Frameworks or Strategies are required for each area.

Chapter 4: Strategic Gaps



Figure 4.1. Photograph taken from road that leads to The Great Barn, near Titchfield Abbey, looking East towards edge of Fareham, in The Meon Gap. Beyond the tree line is Fareham. Photograph: Charlotte Webb June 2020

Chapter 4: Strategic Gaps Overview

- 1. This chapter describes the application of methodology to determine the extent of the two Strategic Gaps in the draft Fareham Local Plan 2036 and gives specific recommendations for each Gap:
 - 1. Fareham/Stubbington and the Western Wards (the Meon Gap)
 - 2. Fareham/Bridgemary and Stubbington / Lee-on-the-Solent (the Fareham-Stubbington Strategic Gap)

Role and purpose of the Strategic Gap

- 2. As a reminder of the previously stated purpose of the Strategic Gap:

“The primary purpose of identifying Strategic Gaps is to prevent the coalescence of separate settlements and help maintain distinct community identities. Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities.”

(Fareham Publication Local Plan 2037)

First Filter to establish Study Area Extents

- 3. The Strategic Gap Study Area extents are shown in Figure 4.1. and detailed site analysis sheets can be found in Appendix 5. The study areas were established to show specific tracts of land between the settlement boundaries of nearest neighbour settlements.

Strategic Policy DS2: Development in Strategic Gaps

“In order to prevent the coalescence of urban areas and to maintain the separate identity of settlements, Strategic Gaps are identified as shown on the Policies map between the following areas:

- 1) *Fareham / Stubbington and the Western Wards (Meon Gap)*
- 2) *Fareham / Bridgemary and Stubbington / Lee-on-the-Solent (Fareham- Stubbington Strategic Gap)*

Development proposals will not be permitted where they significantly affect the integrity of the gap and the physical and visual separation of settlements or the distinctive nature of settlement characters.”

- 4. Both the Meon Gap and Fareham-Stubbington Gap are identified as ‘Cross-authority’ Gaps, with the Meon Gap running north into Winchester City Council Local Plan Area and the Fareham-Stubbington Gap running South-East into Gosport Borough Council Local Plan Area. Identified through PFSH Position Statement 2016.
- 5. Within the sub-region of South Hampshire, the purpose of the Meon Gap *“is of particular significance as it demarks the boundary of the Portsmouth and Southampton Housing Market Areas”* .(PfSH Position Statement 2016)

Chapter 4: Strategic Gaps Overview

-
5. Within Fareham Borough the aim of the Meon Gap is to prevent coalescence of Fareham and Stubbington with the Western Wards, but also important is the avoidance of coalescence with the settlement of Titchfield, that lies within the middle of the Gap. As stated earlier, the Meon Gap runs northwards following the River Valley across the borough boundary into Winchester City Council Local Authority Area, where Winchester Local Plan Policy CP18 - Settlement Gaps' includes the 'Meon Gap' (Whiteley – Fareham/Fareham Western Wards), with a local gap between North Fareham SDA and Knowle and Wickham designated under Policy SH4: North Fareham SDA.
 6. The aim of the Fareham- Stubbington Gap is to avoid coalescence between the settlements of: Fareham and , Bridgemary, with Stubbington and Lee-on-the-Solent. Gosport Local Plan also supports PFSH Position Statement 2016 and has designated a Strategic Gap which runs from the Borough border through the Alver Valley, but also Brookers Field Recreation Ground on the border with Fareham, is designated as Strategic Gap. The settlement boundary for Bridgemary, Gosport, lies on the Borough boundary with Fareham. The Strategic Gap designation is contained within Gosport Local Plan 2011-2029 adopted October 2015.
 8. In addition to the two Appeal Sites at Posbrook Lane, Titchfield, and Old Street, Stubbington, which highlighted 'valued landscapes' in the Meon Valley, recent noteworthy planning applications which also highlight development pressures, within the Strategic Gaps are:
 - P/14/0841/FP: Land of Cartwright Drive, Titchfield
 - P/19/0301/FP: Land East of Crofton Cemetery and West of Peak Lane, Fareham
 - P/14/0222/OA: Longfield Avenue, Land to the South – Fareham
- Housing and Employment Land Availability Study, December 2019. The pressure for development in the Fareham-Stubbington Gap, is very significant to the risk for complete loss of countryside gap. The pressure in the Meon Gap is more moderate, with a 'squeezing' of the central area around Titchfield, but with a significant pressure to develop pockets of land along the west side of Titchfield Road, between Titchfield and Stubbington. There is moderate pressure for development on the Western edge of Fareham and between Titchfield and Titchfield Common and Southwards pressure from Titchfield along Posbrook Lane. The indication of development pressure Southwards from Titchfield Common to Hook, is also of note, with the potential to put pressure on Chilling-Brownwich Coastal Plain.

Potential Development Impact

7. As stated in Chapter 1, a key demonstration of pressure for development comes from the potential site allocations assessed in the Strategic

Chapter 4: Strategic Gaps Overview

11. In the Meon Gap: P/14/0841/FP: Land of Cartwright Drive, Titchfield: Proposals for an 86 unit Care Homes, with associating landscape and car parking and a 15.4ha Country Park (with car parking), was approved though it was contrary to the current Policy C22: Strategic Gaps and within the setting of Titchfield Abbey Conservation Area. Construction on site was recently completed and is included in the site analysis.
12. P/19/0301/FP: Land East of Crofton Cemetery and West of Peak Lane, Fareham: refused for several reasons, such as design in relation to the setting of the Cemetery, but not for it's siting in the Fareham-Stubbington Gap.
13. P/14/0222/0A: Longfield Avenue, Land to the South – Fareham, an outline application for up to 1550 dwelling and associated infrastructure was withdrawn.

Key Routes for experiencing the Strategic Gaps

14. Key routes for the primary purpose of experiencing the physical and visual separation of settlements have been identified and are shown in Figure 4.2. This work ties in closely with the previous analysis carried out by LDA and described in Chapter 3 of the Adopted Fareham Borough Landscape Character Assessment 2017. As much as is possible, the key routes (or 'paths') pass between the settlement edges identified in the first filter, so that a significant number of drivers and walkers should experience the sense of leaving one settlement, passing

through a distinctly different space, i.e. countryside between settlements before reaching another distinctly different settlement. This was tested out as part of the site analysis and is described in Appendix 5.

Settlement Edge Characteristics

15. This study builds upon the work previously carried out by David Hares Associates in the Fareham Borough Gap Review 2012. There have been negligible changes in the settlement edges since 2012 and the summary of settlement types shown in illustration 4 of the Fareham Borough Gap Review 2012 is still relevant:

"The edges of new housing are often more visible than older housing stock as a result of garden tree planting, which has helped to screen the older properties adjoining the gap. Properties which back onto woodland have the most robust edge to the gap" (page 19, Fareham Borough Gap Review. David Hares, 2012)

16. A key feature of many of Fareham's settlement edges is that of Woodland screening. Detailed findings are described in Appendix 5. The Spatial Visibility/Legibility maps A5.8-A5.10 show key long views and views towards settlement edges where dwellings or other landmark buildings can either be seen or are hidden or partially hidden from view by woodland, tree canopies or hedgerows. Primary measure 10 gives descriptions of the impact of the settlement edges on users from multiple vantage points.

Chapter 4: Strategic Gaps Overview

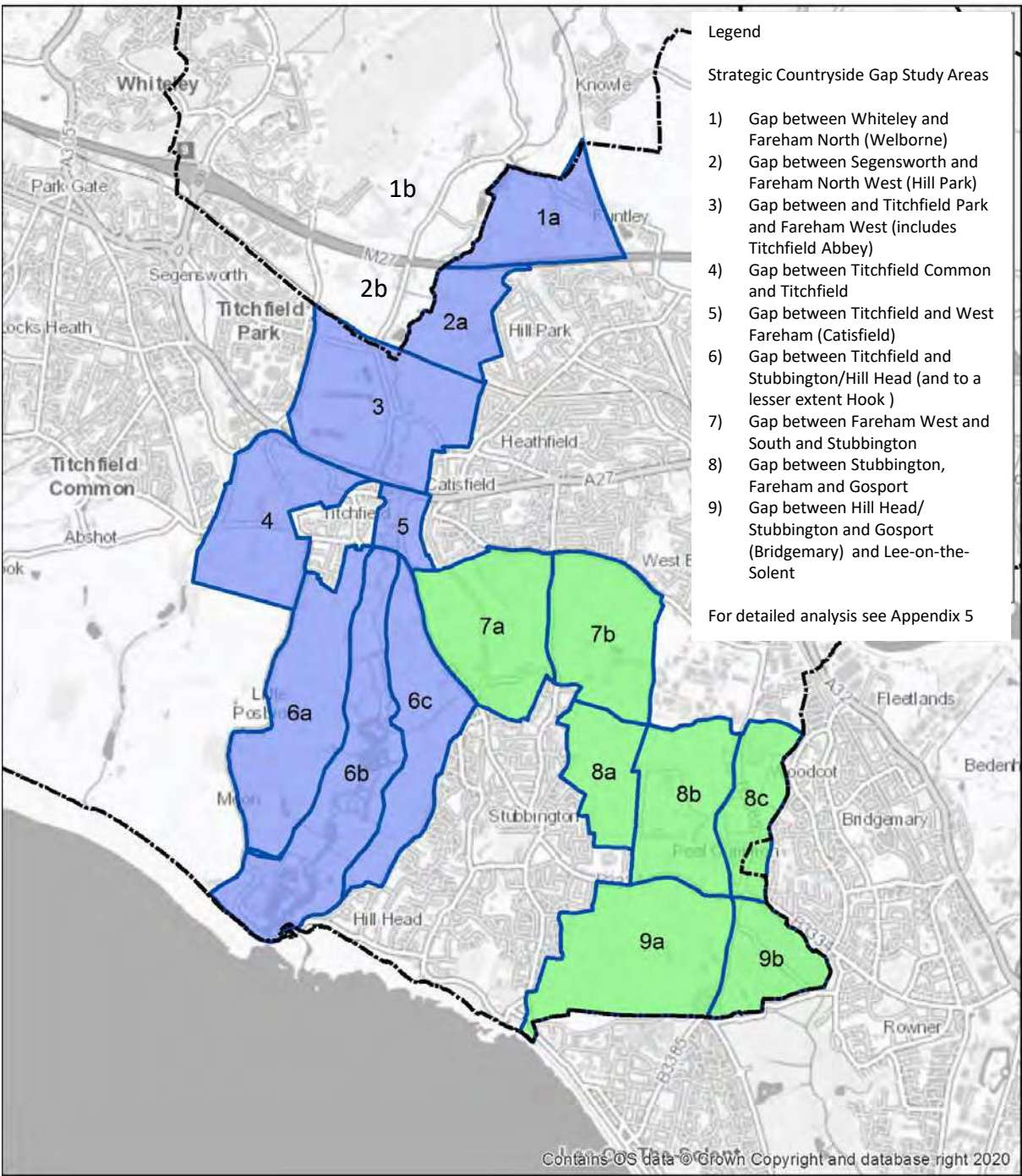


Figure 4.1. Plan showing Strategic Gap Study Area Extents

Chapter 4: Strategic Gaps Overview

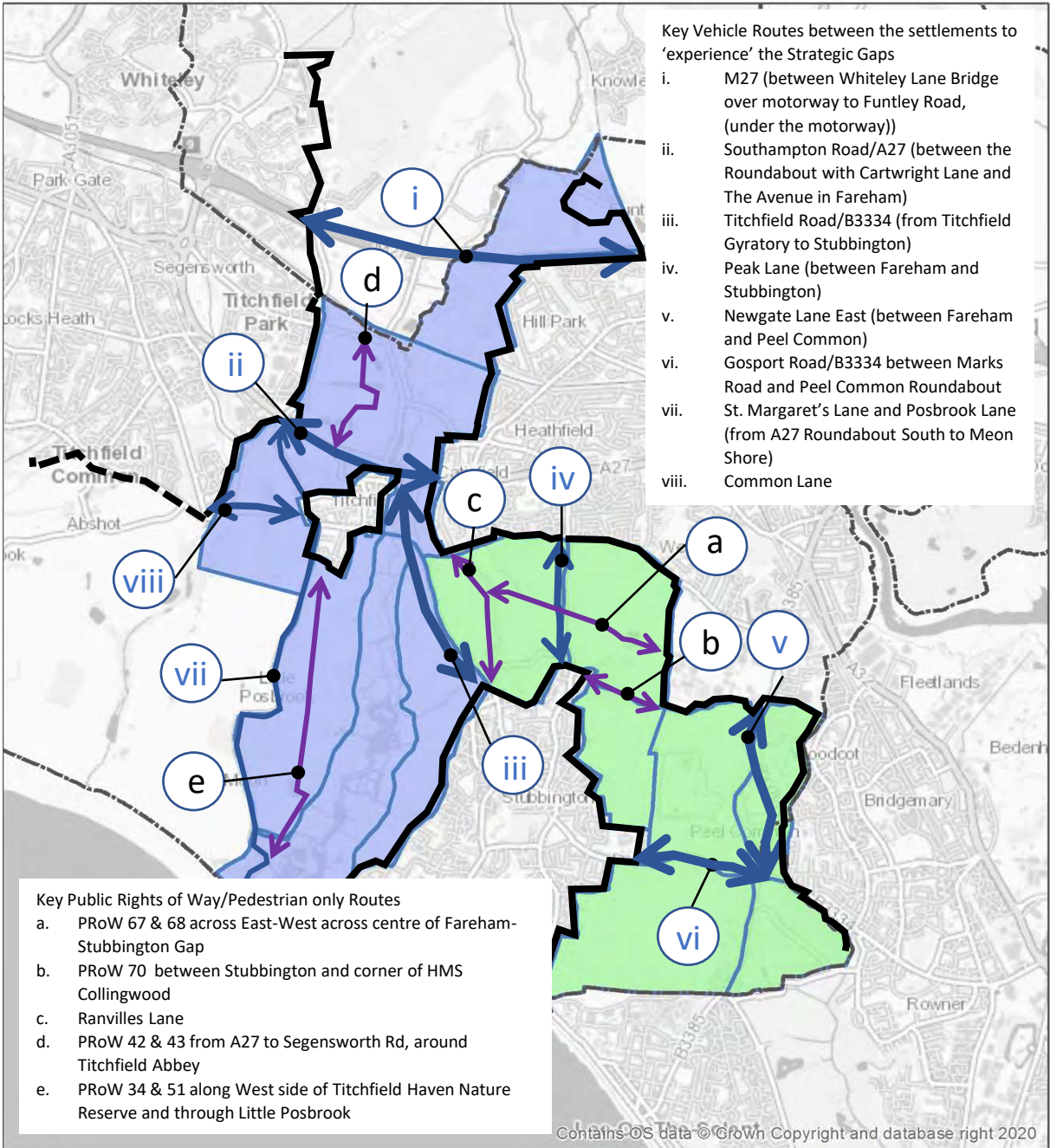


Figure 4.2. Plan showing key experiential routes through the Strategic Gaps

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

Key features of the Strategic Gap

1. Key Features of the Fareham-Stubbington Strategic Gap are:

- Open, predominantly arable farmland and horticulture with some glasshouses, a weak hedgerow structure and few trees
- The settlement edges are for the most part well screened by mature tree canopy, but there is some minor visual intrusion from Fareham, Stubbington and HMS Collingwood
- a few scattered farmsteads/horticultural holdings and a mosaic of small fragments of open farmland and horse-grazed pastures sandwiched between:
- large-scale non-agricultural uses of Business and airfield development at Solent Airport in Daedalus to the South and the utilities of:
 - Peel Common Water Treatment Works enclosed from views by an earth bund and mature tree belt
 - Peel Common Solar Farm
- Construction site of Stubbington-bypass, which will provide an East-West and South route through the Gap that has not previously existed
- Urban fringe character of Peel Common residential area

- Recently completed highway works to Newgate Lane, and Peel Common Roundabout, with associated noise attenuation fencing and bus and cycle infrastructure.

Potential Development Impact

2. As stated earlier, the potential impact of development is high within the Fareham-Stubbington Gap, with the potential to develop large tracts of farmland.
3. It is too early to determine the full impact that Stubbington Bypass will have on the landscape character and development pressures of the Gap. As the Bypass is currently under construction and its alignment marked out, it is possible to see how it might affect the sense of separation between Fareham and Stubbington. In some respects it strengthens the sense of separation because it will be a physical demarcation and partial interruption to cross-movement. It also becomes another key route from which to experience the Gap, but it will bring more noise and activity and may exert a suburbanising influence on the landscape. It is strongly recommended that once the construction works have been completed and the road is fully operational a review of the Landscape Character Assessment for LCA 7: Fareham-Stubbington Gap is carried out.

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

Other Environmental and Planning Designations

4. Unlike the Meon Gap, the Fareham-Stubbington Gap does not have a significant number of environmental designations. The only are two areas of Ancient/Semi-Ancient Woodland: Oxleys Coppice, which is also a SINC (Southern edge of Fareham) and Tips Copse, (East edge of Stubbington, North of Crofton Secondary School). The Strategic Gap designation would be the key designation in this area.

Summary findings of the Study Area Assessments:

5. The descriptions run from West to East and then South. More detailed analysis of each area can be found in Appendix 5.

Area East of Titchfield Road and West of Peak Lane (Strategic Gap Study Area 7a):

6. Due to the significant number of viewpoints from long stretches of the key roads that run through the area: Titchfield Road and Peak Lane (and from the Stubbington Bypass, when it is completed) and from the numerous footpaths that run through the middle of this area, it is strongly recommended that the vast majority of this section of Strategic Gap remains intact. It provides a useful informal recreational resource, within a distinctive

landscape character, that is of good quality, where residents can walk in relative tranquility away from roads and enjoy long and varied views. Due to its moderate to large gap dimensions (800-1.2km) it has been able to retain a relatively high level of tranquility and dark nights skies, compared to other parts of Fareham and it would be a significant loss to local residents if they were not able to continue to enjoy this informal recreational resource.

7. For this section of the Gap, this analysis agrees with the summary findings of LDA in Chapter 3 of the Fareham Borough Landscape Character Assessment 2017 - *"The landscape performs a highly effective role in providing a 'sense' of separation and the experience of moving between one settlement and the other.Edges of Fareham and Stubbington are clearly defined by strong boundary vegetation and there is a clear distinction between 'town and country' there is a strong sense of leaving one urban area and moving through open countryside before entering another. Scale of the gap allows the time to appreciate sense of being in open countryside. Being able to see far across the gap and identify the edges, also strengthens the sense of separation."* (page 41) .

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

8. However there exists the potential to make modifications to the settlement boundary of North Stubbington: to extend the boundary to run along Oakcroft Lane, as the isolated field that sits aside Crofton Cemetery, does not protrude into the landscape beyond the current Northern and Western edges of Stubbington. Largely sitting behind a mature line of Poplars also helps this isolated field absorb some development (subject to detail design), without risking the integrity of the Gap, as a whole. Retention and enhancement of GI will be required, within the site. **Development of a GI Framework or Strategy is recommended** for the site in its context.

Area East of Peak Lane and West of HMS Collingwood (Strategic Gap Study Area 7b):

9. Whilst this area comes under the same Landscape Character Area as Strategic Gap Study Area 7a, the terrain is much flatter, and the blocks of vegetation are less varied. Vegetation around the main large field screens the field from view from many vantage points. There are much fewer opportunities to see across this land, unless close to the field gates. From within the main field there are more visual detractors in the form of MOD buildings in HMS Collingwood, a low-rise tower in the

adjacent estate off Longfield Drive and a long view to the Fareham Borough Council Office Tower Block. Subject to detailed design, scale and functions, it is considered possible for the main field to absorb some development without a significant impact on visual quality of the Strategic Gap. If managed appropriately, development could have beneficial effect on the GI network (recreational and environmental) that exists around the periphery of the field subject to appropriate attention being paid to GI provision and design.

Therefore a change in Strategic Gap boundary could potentially be accommodated without undermining the principal purpose of the gap to prevent coalescence of settlements. However, such adjustment would be driven by more detailed testing of development forms, scale, landscape and GI interventions. Such work would also need to consider the potential reduction of tranquility and dark night skies ratings in the area. **Establishing a GI Framework or Strategy is recommended.**

10. The experience of driving along Peak Lane is currently pleasant and it is recommended that with any potential boundary change that a GI zone of around 150m width between Peak Lane and any development, be established. This is to maintain the experience of

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

‘leaving’ Fareham driving through Countryside and arriving at the separate settlement of Stubbington.

The Open Coastal Plain between Stubbington and the Peel Common Water Treatment Works, (Strategic Gap Study Area 8a)

11. There are two key PRoW across this Landscape, that connect Stubbington and Fareham through a narrow gap of around 600m. The paths cross a dramatic flat landscape which has strong linear North-South views between Daedalus and Newgate Lane Farm, framed by blocks of woodland vegetation, on the boundary bund around the Peel Common Water Treatment Works and the east side of Stubbington, including Tips Copse Ancient Woodland. These views should be valued and retained, providing a great sense of space in an otherwise narrow corridor.
12. There is very little opportunity to absorb development in this corridor. Visual intrusion of buildings would be unwelcome, as it would reduce tranquility. Some of the tree belts are thin, and a substantial belt of woodland would strengthen the landscape structure and provide an attractive edge to frame North South Views and views towards the eastern edge of Stubbington. Advance planting of this

belt would be advised. A **GI Framework or Strategy is recommended.**

Section of Fareham-Stubbington that provides a three-way Gap between Stubbington, Fareham and Gosport (Bridgemary) (Strategic Gap Study Area 8b)

13. There are no proposed changes to the Strategic Gap in this area. The strong screening around the Peel Common Water Treatment works provides an effective visual and physical barrier between all three settlements.
14. There is pressure for development along Gosport Road (A334) between the Southern edge of Stubbington and Peel Common. It is strongly recommended that development pressure is resisted in this area as it would risk visual and physical coalescence between Stubbington and Gosport.

Newgate Lane and Peel Common Area (Strategic Gap Study Area 8c)

15. Despite the proximity of Fareham and Gosport in the north part, the gap is currently still effective in providing a ‘sense of separation’, but it is at risk. Substantial vegetation around boundaries currently prevents visual coalescence. There is a defined boundary along settlement edges and a gap of sufficient scale and

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

and coherence of character. Whilst the recently completed Newgate Lane South road development does not alter the experience of entering the urban area of Gosport beyond the Peel Common Roundabout, it does reduce tranquility and bring more built features (such as noise attenuation barriers) into this part of the gap. Further development within the gap in addition to the road scheme, together with existing urban fringe activity, is likely to cause visual, or even physical, coalescence of settlements on either side of the new road corridor.

16. Even with the development of Newgate Lane South, the previous analysis carried out by LDA and described in Chapter 3 of the Fareham Borough Landscape Character Assessment 2017, is still relevant: *“A cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap, i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap.” (page 43)*

17. It is recommended that a **GI Framework or Strategy for the Strategic Gap Study Area 8c** would be beneficial to enhance the GI value of the current gap and potentially help determine an appropriate GI framework for moderately scaled development. The planting associated with the Newgate Lane Highway works will exert a stronger woodland/hedgerow edge as it establishes, and this should be factored into a GI Strategy. The GI Strategy or Framework should reassess the Open Coastal Plain Landscape Type: with a view to creating stronger GI structure throughout, but highlighting and retaining long North-South views, and largely undeveloped views eastward from old Newgate Lane, to retain a sense of space and ‘big skies’.

Daedalus and Lee-on-the-Solent Golf Course (Strategic Gap Study Area 9a and 9b)

18. This study does not suggest alterations to the Strategic Gap around the Airfield and Lee-on-the-Solent Golf Course. Current development within the Airfield is highly visible, but in keeping with current land uses/character of the area. Some further development could be accommodated in the Airfield but would depend on where within the site; scale and; what mitigation is delivered.

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap



Figure 4.12 Photograph from PRow in Study Area 7a, looking North East towards Peak Lane, and South Fareham
Photograph Charlotte Webb
June 2020.



Figure 4.13 Photograph from Peak Lane, looking towards Southern edge of Fareham.
Photograph Charlotte Webb
June 2020.



Figure 4.14 Photograph from Stubbington By-pass Construction site, looking towards Crofton Cemetery, and distinctive row of Poplars.
Photograph Charlotte Webb
June 2020.

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

Figure 4.15 Photograph from Stubbington By-pass Construction site, looking South towards Glass houses on edge of Stubbington Photograph Charlotte Webb June 2020.



Figure 4.16 Photograph from Stubbington By-pass Construction site, looking East towards Newgate Lane Farm Photograph Charlotte Webb June 2020.



Figure 4.17 Photograph from Stubbington By-pass Construction site, towards Fareham South (Longfield Avenue) and Broadlaw Walk centre. Photograph Charlotte Webb June 2020.



Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap



Figure 4.18 Photograph taken near Newlands Farm, from Stubbington Bypass Construction site, looking North East to Tower block near Longfield Avenue, Photograph Charlotte Webb June 2020.



Figure 4.19 Photograph from Stubbington Bypass Construction site, looking North East to Peak Lane, Photograph Charlotte Webb June 2020.

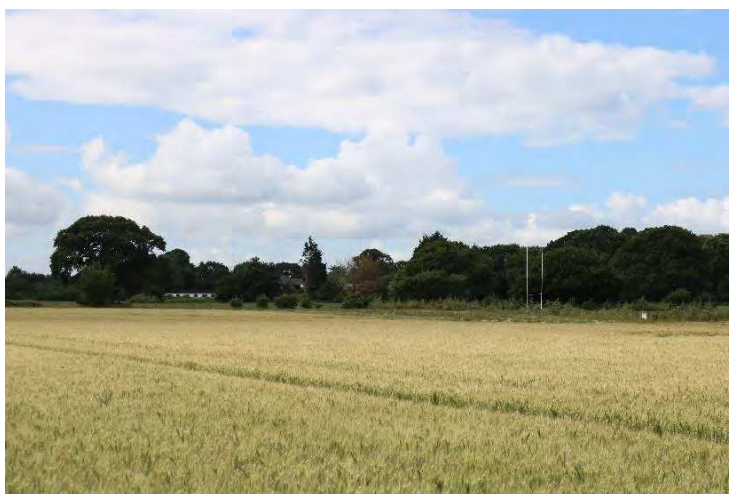


Figure 4.20 Photograph from PRoW crossing from Stubbington to Tanners Lane, looking South towards Meoncross School, Photograph Charlotte Webb June 2020.

Chapter 4: Strategic Gaps

SG 2: The Fareham-Stubbington Gap

Figure 4.21 Photograph from Newgate Lane West, looking South towards Peel Common Roundabout. Photograph Charlotte Webb June 2020.



Figure 4.22 Photograph from Brookers Field, looking West towards Newgate Lane. Photograph Charlotte Webb June 2020.



Figure 4.23 Photograph from verge on Newgate Lane East, looking towards settlement edge of Bridgemary. Photograph Charlotte Webb June 2020.



Chapter 5: Summary Conclusions and Recommendations



Figure 5.1. Photograph of Titchfield Abbey, from the new Country Park adjacent to A27.
Photograph: Charlotte Webb June 2020

Chapter 5: Summary Conclusions and Recommendations

-
1. The resultant analysis and site surveys of all Fareham Borough's Landscape Character Areas recommends that:
 - The six proposed ASLQ put forward for designation in the Fareham Local Plan Supplement (Reg 18 consultation document, Jan-March 2020), can be considered as 'valued landscapes' as they scored highly against the assessment criteria and therefore should be identified for ASLQ designation in the Fareham Local Plan 2037, with some modifications made to boundaries, to bring them into line with the current Fareham Borough Landscape Character Assessment 2017, but also;
 - Through this process, two further landscape character areas in Fareham were identified as having equivalently 'valued landscape' characteristics and so it is recommended that Chilling-Brownwich Coastal Plain and parts of the Cams to Portchester Coast should also be designated.
 - Conservation Areas where they sit in or adjacent to a proposed ASLQ should be included as part of the ASLQ because of their mutually supportive relationship.
 2. It is considered that there is a clear difference between the ASLQ designation, where the landscape value is the key reason for designation, in the context of Strategic Gaps, landscape character and its quality are a 'part of the picture' sitting amongst a broader range of criteria.
 3. The resultant analysis and site surveys of the two Strategic Gaps, conclude that the Meon Strategic Gap:
 - is proposed for continued designation, having both strong sub-regional justification for its designation, and a clear and continued role in preventing settlement coalescence, that could result from pressure for expansion of the Western Parishes; North and West Fareham, and from pressure for the expansion of Stubbington with;
 - one moderate amendment proposed to the North Eastern corner of the Meon Gap; that is an extension to the Gap around Funtley to prevent Funtley from coalescing with North and West Fareham.
 4. The Fareham-Stubbington Strategic Gap is proposed for continued designation, also having strong sub-regional justification for its designation, with an important role in preventing settlement coalescence from continued and heavy pressure for Southern expansion of Fareham and Northern and Eastern expansion of Stubbington, but it is considered that there may be potential for some development to be accommodated within the landscape, without compromising its Strategic Gap function.

Chapter 5: Summary Conclusions and Recommendations

5. Possible adjustments to the Fareham-Stubbington Strategic Gap could be considered in the following locations:
 - An area to the south of Fareham, and west of HMS Collingwood, as some development in this area could be visually absorbed into the Gap without compromising the Gap function.
 - An area to the north west of Stubbington, south of Oakcroft Lane and east of Ranvilles Lane.
6. It also noted that the Newgate Lane Area (Newgate Lane West and East from Fareham to Peel Common Roundabout) has undergone a significant amount of change in the recent past.
7. In order to develop appropriate Green Infrastructure mitigation and enhancement associated with the areas of recent and future change described above, in the Fareham-Stubbington Gap, Green Infrastructure Frameworks or Strategies are required for each area.

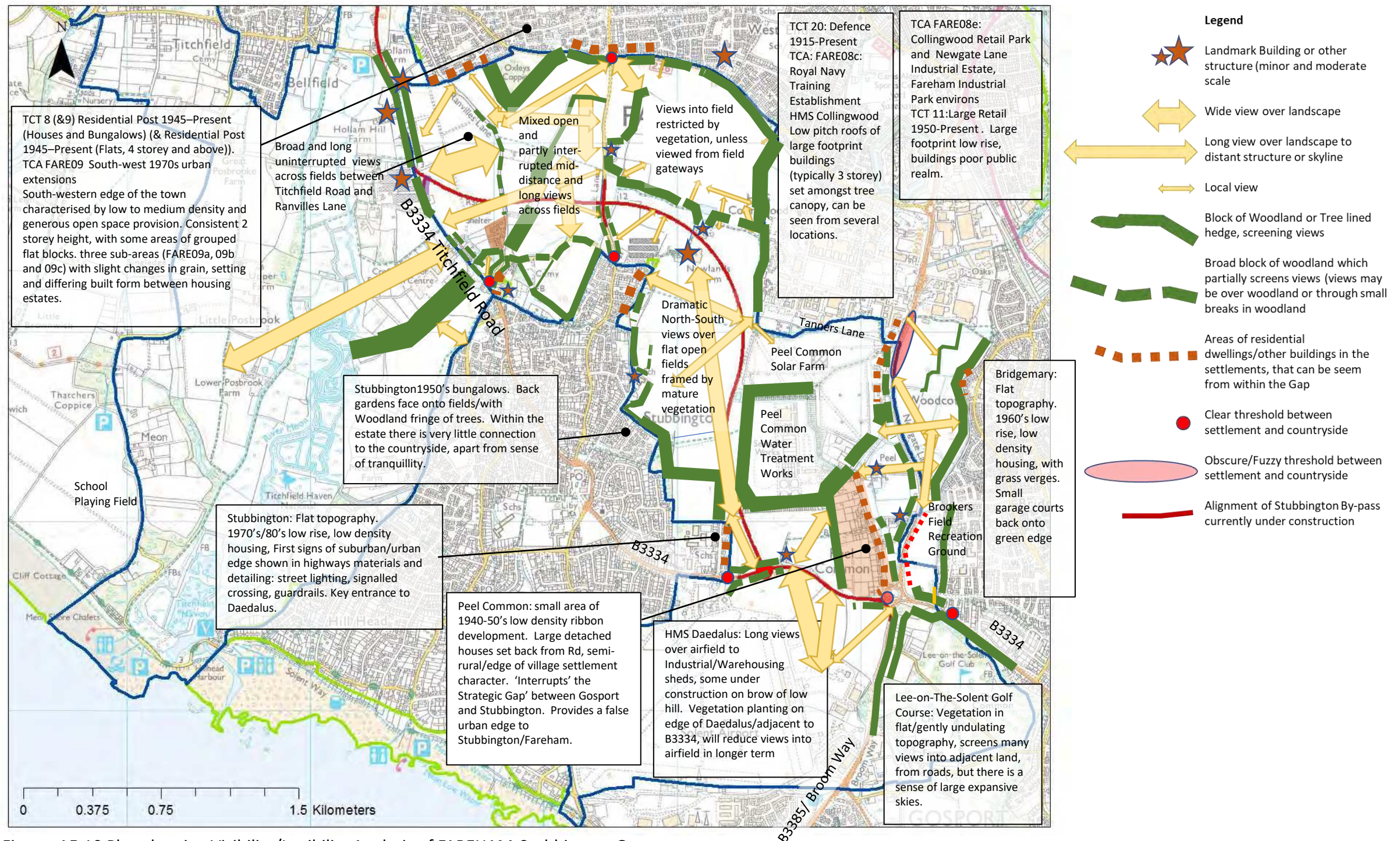


Figure: A5.10 Plan showing Visibility/Legibility Analysis of FAREHAM-Stubbington Gap

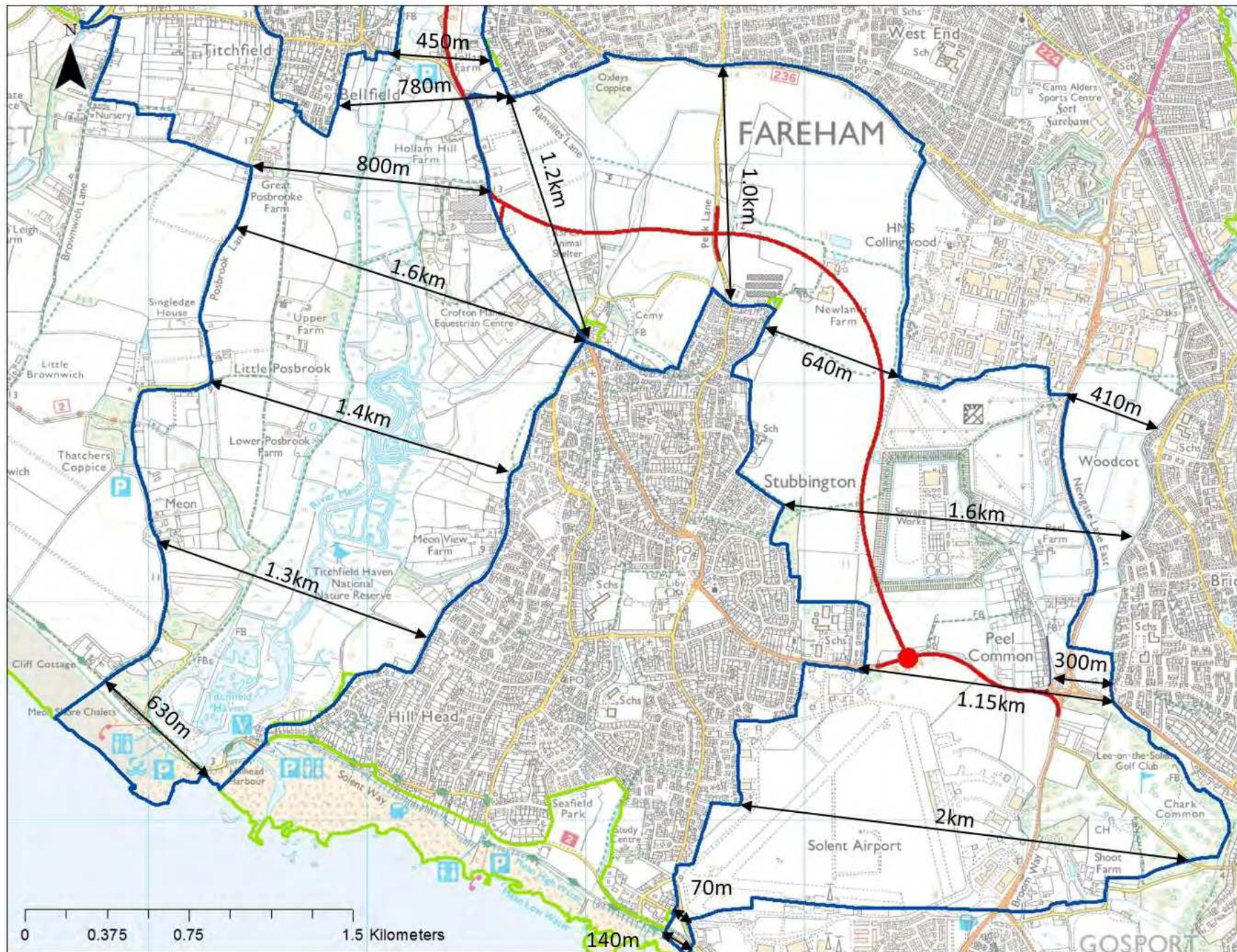
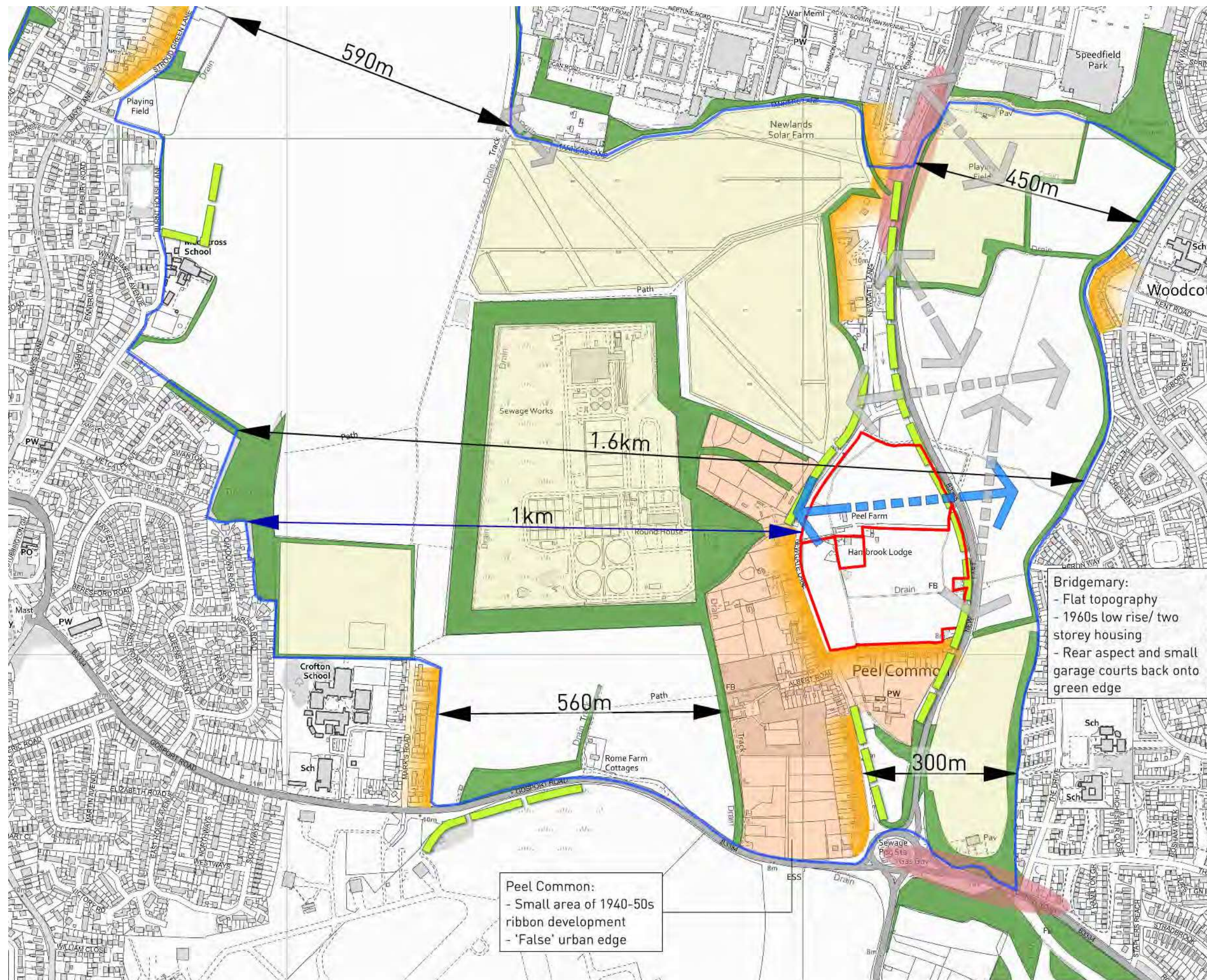


Figure: A5.12 Plan showing Key Distances across the Southern Part of Meon Strategic Gap and the Fareham-Stubbington Strategic Gap between Settlement edges (distances are approximate)

APPENDIX FL&BH 1.2.4

LANDSCAPE ANALYSIS OF THE STRATEGIC GAP



KEY

- Site boundaries (north and south)
- Strategic gap boundary
- Local view*
- Identified local view that is actually truncated by Newgate Lane East
- Block of woodland or tree lined hedge, screening views*
- Broad block of woodland which partially screens views (views may be over woodland or through small breaks in woodland)*
- Areas of residential dwellings/ other buildings in the settlements, that can be seen from within the Gap*
- Obscure/ fuzzy threshold between settlement and countryside*
- Infrastructure and amenity uses are influential in the gap
- Urbanising areas of Peel Common satellite
- Key distances within the gap**

NOTES

- * Based on analysis in Technical Review of Special Landscape Quality and Strategic Gaps, Hampshire County Council, 2020
- ** Distances are approximate

Land at Newgate Lane (north) and
Land at Newgate Lane (south),
Fareham, Hampshire

Client: Fareham Land LP and Bargate
Homes Ltd

Appendix FL&BH 1.2.4 Landscape Analysis of the Strategic Gap

Drawing no. : BRS. 4989_82
Date : 21/10/2020
Drawn by : NF
Checked by : JWA
Scale : 1 : 7500 @ A3

APPEAL BY FAREHAM LAND LP AND BARGATE HOMES LTD

LAND AT NEW GATE LANE (NORTH) AND LAND AT NEW GATE LANE (SOUTH), FAREHAM, HAMPSHIRE

LANDSCAPE AND VISUAL MATTERS: SUMMARY PROOF OF EVIDENCE

PREPARED BY:

JAMES W. ATKIN
BSC (Hons) DIP LM CMLI



5 The Priory, Old London Road, Canwell, Sutton Coldfield, B75 5SH

T 0121 308 9570 www.pegasusgroup.co.uk

CONTENTS

1. INTRODUCTION	2
2. BACKGROUND	3
3. SUMMARY	4

1. INTRODUCTION

Qualifications and Experience

- 1.1. My name is James Atkin, Director (Landscape) in the Birmingham Office of the Pegasus Group and a Chartered Member of the Landscape Institute (2005). I have over 19 years experience specialising in the application of LVIA across a range of sectors including power, highways, rail, housing, waste, land reclamation and restoration, mineral extraction, commercial developments and renewable energy.
- 1.2. Since joining the Pegasus Group I have completed detailed LVIA's for sites across the UK, including schemes for residential, mixed use, care home, solar and commercial development. As an inherent part of this work I apply an iterative process of LVIA to inform masterplanning principles that respond appropriately to landscape and visual constraints and opportunities.

Terms of Reference

- 1.3. This evidence is written on behalf of Fareham Land LP and Bargate Homes Ltd (the appellants) and relates to an appeal for non-determination by Fareham Borough Council in respect of two outline applications for residential development, both on land to the east of Newgate Lane. This evidence sets out an overview of relevant landscape and visual matters.
- 1.4. Principles and good practice for undertaking landscape and visual impact assessment (LVIA) and/or applying the principles of LVIA are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹ (GLVIA3). The concepts and procedures set out in this guidance have been adopted where appropriate.
- 1.5. The evidence included in this supporting statement for this appeal (LPA reference: P/18/1118/OA - AND - P/19/0460/OA) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

2. BACKGROUND

- 2.1. The appeal sites extend to ca. 10 hectares (ha) of agricultural land, situated close to the urban edge of Fareham. The appeal sites are bounded by Newgate Lane to the west, Woodcote Lane to the south and Newgate Lane East to the east.
- 2.2. The wider landscape context of the appeal sites includes the low-lying ground of the coastal plain and the adjacent urban environments of Fareham, Gosport (with Woodcot and Bridgemarky). The settlement area of Stubbington forms the western extent of the Strategic Gap which extends across the coastal plain between the local settlement areas. Separation is most pronounced across the arable areas between Fareham/Peel Common and Stubbington.
- 2.3. The applications were submitted with a detailed LVIA which set out a comprehensive baseline and robust assessment of predicted impacts. These included details as to how landscape and visual matters have influenced the design of the masterplan, with mitigation measures consequently forming an inherent part of the proposals.
- 2.4. The reasons for refusal raises three main issues in respect of landscape and visual matters, stating that:
 - b) The proposed development fails to respond positively to and be respectful of the key characteristics of the area and would be harmful to the character and appearance of the countryside;
 - c) The provision of development in this location would significantly affect the integrity of the strategic gap and the physical and visual separation of settlements;
 - d) The application site is not sustainably located adjacent to, well related to or well-integrated with the existing urban settlement boundaries;
- 2.5. This evidence considers these issues against various information, including the submitted LVIA's, consultation responses, report to committee and other relevant baseline and evidence base documents related to landscape and visual matters.

3. SUMMARY

- 3.1. The submitted LVIAs address the key characteristics of the appeal sites and their context. The submitted LVIAs also set out an assessment of the impact and approach to mitigation. This process also enables judgements to be drawn in respect of the context of the appeal sites in relation to the existing urban settlement edges/boundaries.
- 3.2. With reference to this material, and supported by my own additional analysis where necessary, I conclude that the appeal schemes will not be harmful to the character and appearance of the countryside, will not significantly affect the integrity of the Strategic Gap and will relate well to the existing patterns of settlement.
- 3.3. This is on the basis the relevant key landscape characteristics of the area have been considered through the process of LVIA, consequently informing the analysis of constraints and opportunities, and ultimately the landscape strategy for the mitigation. This forms an integrated part of the two masterplans for northern and southern schemes.
- 3.4. Consequently, I consider the approach taken to the design of the respective masterplans to have adopted a positive approach in landscape and visual terms.
- 3.5. The loss of the agricultural enclosures and replacement of these areas with residential development is largely the main cause of impact, however this is balanced by the response to the grain and pattern of the landscape and its scale, as well as the response to the characteristics of the landscape, several of which are defined as 'essential' by the published guidance. Where these are referenced, mitigation adopts an approach of retention and/or enhancement.
- 3.6. I consider that the subsequent residual impacts of the appeal schemes will be acceptable in landscape and visual terms.
- 3.7. In terms of the Fareham to Stubbington gap, I consider the appeal sites are well placed to accommodate development without undue consequences or impacts on the role and function of the Strategic Gap. This is on the basis that:
- In relation to distances, the appeal schemes will reduce the gap between Bridgemary and Stubbington physically from ca. 1.6km to ca. 1.1km which remains a considerable distance and well within the thresholds of the 'rule of thumb' appropriate distances set out in the FBC study;

- In terms of visibility, the appeal schemes will be physically and visually well contained – they sit within the strong green infrastructure framework that is evident in the form of blocks of woodland and tree lined hedges which screen or partially screen views – furthermore they will not be visible across the Strategic Gap from Stubbington;
- Existing screening is present immediately adjacent to the appeal sites in terms of the woodland around the waste water treatment works, along Newgate Lane and within the emerging framework of vegetation along Newgate Lane East that will continue to establish and increasingly provide a robust visual screen from the east;
- The surrounding context and urbanising influences, including the settlement area of Peel Common which reduce the degree of change;
- The opportunity to contribute to, and maintain, a strong green infrastructure network that complements both the strategic gap and the areas of settlement, in the form of the landscape d areas and landscape buffers along the eastern and western edges of the appeal sites which will reinforce and connect the linear routes which cross broadly north to south through this area; and
- In connection with the green infrastructure provision, the ability to incorporate substantial mitigation that will successfully avoid or minimise landscape and visual effects.

3.8. I also note that, notwithstanding differences in the technical approaches, the Pegasus Group and FBC Strategic Gap studies both independently acknowledge that the Strategic Gap can accommodate some form of growth and development within it. Both also recognise the need for additional, more detailed assessment on a site/project basis.

3.9. In respect of the conclusions of the FBC Strategic Gap study (where these note the relatively poor state of the gap at this point), I would think a logical and appropriate conclusion would be to amend the boundary to omit this part of the landscape from the Strategic Gap, creating capacity for development to come forward with a strong framework of green infrastructure and mitigation. This would place an emphasis on the importance of the core areas that are located further west, between Fareham and Stubbington where the Strategic Gap clearly delivers its role and function in full.

3.10. Finally, the reason for refusal suggests that the appeal schemes will not relate to, or integrate with, the existing urban settlement boundaries. However, my evidence demonstrates that the appeal sites are well related to Peel Common, being located to the east of Newgate Lane, physical contained by the alignment of Newgate Lane East and situated immediately adjacent to the existing residential dwellings off Woodcote

Lane and directly opposite the mix of dwellings and urban influences along the northern section of Newgate Lane.

- 3.11. With existing and proposed green infrastructure in place, the appeal schemes will consolidate the pattern of Peel Common within a clearly defined limit. As such I consider that the appeal schemes will integrate well, and in a positive way, with the settlement area at Peel Common.
- 3.12. Furthermore, there are some existing physical connections between Peel Common and Bridgemark. With the appeal schemes in place, the consolidated pattern of Peel Common would continue to blend with the urban edge of Gosport and Bridgemark, focused along the green route into Bridgemark (along Woodcote Lane) and focussed on the large amenity open space of Brookers Field Recreation Ground.
- 3.13. If the previous emerging allocation of HA2 were to come forward, this broader area of development would reinforce the connection between Peel Common (including the appeal sites) and the edge of Fareham. In each eventuality, I consider there to be a good connection between the appeal schemes and the existing areas of the settlement.
- 3.14. In all respects, considering Peel Common in itself, connections to Gosport, and with the potential for HA2 to come forward, development in this area will maintain a robust gap between Fareham (aligned with the western edge of Peel Common) and Stubbington.
- 3.15. Overall, in the context of these limited issues, and with the appeal schemes in place, landscape and visual issues are not sufficient to support a prospective reason for refusal.

FAREHAM Local Plan 2037

Introduction

The Council has published the Publication Version of the Local Plan. This consultation is the final stage before the Plan is submitted to a Government Planning Inspector for independent examination.

The Statement of Representations Procedure and Statement of Fact sets out how and when you can view the Local Plan and respond to the consultation.

You can make comments on the Plan, known as representations, up to 18 December 2020.

What can I make a representation on?

This consultation is different from previous ones as it no longer seeks views on alternative options. You will be asked whether you think the Plan is:

- **Legally Compliant:** Does the Plan meet the legal requirements for plan making as set out by planning laws?
- **Sound:** Has the Plan been positively prepared? Is it justified, effective, and consistent with national policy?
- **Complies with the Duty to Co-operate:** Has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

You can make a representation on any part of the plan, but only comments that address the three questions above can be taken into account.

You can find out more about each of the questions by reading Fareham Today and the Frequently Asked Questions.

What happens next?

A Planning Inspector will be appointed to consider the Plan and comments from the consultation on behalf of the Secretary of State. All representations will be forwarded, together with the Publication Plan, to the Planning Inspector for consideration.

PERSONAL DETAILS

Data Protection Privacy Statement – Consultation on the Local Plan in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

In order to deliver services to the citizens and communities in Fareham Borough, it is necessary for the Council to collect, gather and process personal data.

In relation to the consultation on the Local Plan in accordance regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Fareham Borough Council will collect and process personal data for the following processing purposes:

- Receiving representations to the consultation and submitting the Local Plan for examination in public.

The Council is processing this personal data by virtue of the following Lawful Basis:

- Compliance with a legal obligation
- Performance of a task carried out in the public interest.

Consultation responses will be entered onto the online consultation form. The company that host the online consultation form, Snap Surveys are ISO 27001 certified and will store the data on a secure UK server.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when the Council submits the Local Plan and associated documents to the Secretary of State, for examination in public, the responses made to the consultation on the Local Plan must also be submitted. This includes the personal data collected, such as name, address and contact details.

In addition, any representations submitted will be made available on the Fareham Borough Council website. Addresses, email addresses and phone numbers will not be published.

Representations linked to plan making will be retained for no more than 5 years following adoption of the Local Plan. We will not keep this information for longer than is necessary.

You have certain rights under the General Data Protection Regulations (GDPR) in respect of your personal information. More information about your rights can be found on the Council's website or on request.

A1 Is an Agent Appointed?

☒ Yes

☐ No

A2 Please provide your details below:

Title:	MR
First Name:	PAUL/OWEN
Last Name:	THOMAS/DAVIS
Job Title: (where relevant)	
Organisation: (where relevant)	BARGATE HOMES AND SUSTAINABLE LAND PRODUCES LTD
Address:	C/O AGENT
Postcode:	
Telephone Number:	
Email Address:	

A3 Please provide the Agent's details (if applicable):

Title:	MR
First Name:	DANIEL
Last Name:	MILLWARD
Job Title: (where relevant)	SENIOR PLANNER
Organisation: (where relevant)	PEGASUS PLANNING GROUP LTD
Address:	
Postcode:	
Telephone Number:	
Email Address:	

You can check which paragraph, policy etc you want to comment on by looking at the Publication Local Plan.

You can find out more about what you can comment on by reading Fareham Today and the Frequently Asked Questions.

B1 Which part of the Local Plan is this representation about?

- | | |
|---|-----------|
| <input checked="" type="checkbox"/> A paragraph | Go to B1a |
| <input checked="" type="checkbox"/> A policy | Go to B1b |
| <input type="checkbox"/> The policies map | Go to B1c |

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

THE WHOLE PLAN

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

DS, H1, HP4

B1c Which part of the Policies Map?

N/A

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

PLEASE SEE ACCOMPANYING REPRESENTATIONS

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

PLEASE SEE ACCOMPANYING REPRESENTATIONS

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

PLEASE SEE ACCOMPANYING REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ACCOMPANYING REPRESENTATIONS

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ Yes, I want to take part in a hearing session

☐ No, I don't want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

There are several detailed and complex points made within our representations which would benefit from further debate and consideration. It is also important that our clients can respond orally to hearing statements made by the Council and other participants to ensure that the Inspector has a full understanding of our case.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL

Keely, Lauren

From: Consultation
Sent: 21 December 2020 08:57
To: Planning Policy
Subject: Bargate Homes (on behalf of Pegasus Group)
Attachments: Fareham LP 2037 Reps_Bargate_Holly Hill Lane_Dec 2020.pdf; Landscape Response_Bargate_Holly Hill Lane.pdf; LVEA Opps and Cons_Bargate_Holly Hill Lane.pdf

Importance: High

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Caroline Gould <[REDACTED]>
Sent: 18 December 2020 17:07
To: Consultation <Consultation@fareham.gov.uk>
Cc: Trevor Moody <trevor.moody@pegasusgroup.co.uk>; Jeremy Gardiner <jeremy.gardiner@pegasusgroup.co.uk>
Subject: Fareham Local Plan 2037 - Representations on behalf of Bargate Homes - Land at Holly Hill Lane, Sarisbury
Importance: High

Dear Sir/Madam

I refer to the above matter and attach representations and one associated appendix prepared by Pegasus Group on behalf of Bargate Homes in relation to their interest in Land adjacent to 75 Holly Hill Lane, Sarisbury.

I look forward to receiving receipt of these representations in due course.

If you require anything else please do not hesitate to contact me.

Kind regards

Caroline Gould
Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

3 West Links | Tollgate | Chandlers Ford | Eastleigh | Hampshire | SO53 3TG

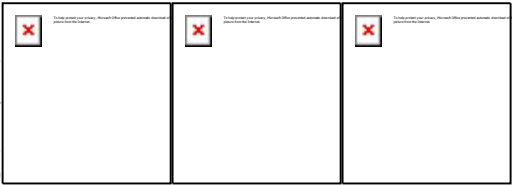


Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



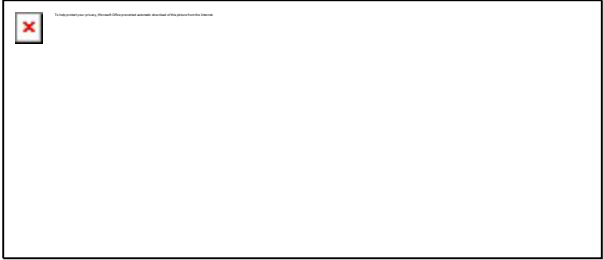
www.pegasusgroup.co.uk

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.
This email and any associated files, is intended for the exclusive use of the addressee only.
If you are not the intended recipient you should not use the contents nor disclose them to any other person.
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.
*****IMPORTANT INFORMATION REGARDING PEGASUS GROUP & CORONAVIRUS / COVID-19*****

After the extraordinary events of 2020, may we wish you a peaceful Christmas and a Happy New Year.
Our company will take a break over the festive period so Pegasus Group will close from 5.30pm on **Wednesday 23rd December 2020** and reopen at 9am on **Monday 4th January 2021**



FAREHAM LOCAL PLAN 2037 REPRESENTATIONS

LAND ADJACENT TO 75 HOLLY HILL LANE, SARISBURY

ON BEHALF OF BARGATE HOMES



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

 **DESIGN**  **ENVIRONMENT**  **PLANNING**  **ECONOMICS**  **HERITAGE**

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0 Introduction 1

2.0 Plan Overall 3

3.0 Specific Proposed Changes 13

4.0 Participation at the Examination Hearing Sessions 24

APPENDICES:

1.0 Landscape Response prepared by Terra Firma Consultancy including Opportunities and Constraints Plan

1.0 Introduction

- 1.1 The following representations are prepared by Pegasus Group on behalf of our client, Bargate Homes. Our client has interests in Land adjacent to 75 Holly Hill Lane in Sarisbury.
- 1.2 The site is irregular in shape and extends to approximately 2.6 hectares. It is accessed via Holly Hill Lane, which adjoins the south-western boundary of the site, and the majority of the site lies to the east (rear) of the properties which front Holly Hill Lane. The southern boundary of the site adjoins Holly Hill Woodland Park and the eastern boundary extends as far as the boundaries of the properties on Mulberry Lane (accessed from Barnes Lane). The site has previously been promoted through Fareham Borough Council's (FBC) Strategic Housing and Employment Land Availability Assessment (SHELAA) – Site ID 1005.
- 1.3 For the reasons set out in these representations, our client is strongly of the view that this site should be allocated for residential development in the Fareham Local Plan 2037 (hereafter referred to as the Publication Local Plan). It is estimated that the site could accommodate approximately 30 dwellings. These representations also set out our client's position in relation to required amendments to some of the more general policies proposed within the Publication Local Plan (PLP).
- 1.4 Our client is an important stakeholder within Fareham and is keen to work with the Council to produce a plan which is legally compliant and meets the tests of soundness set out within the National Planning Policy Framework (NPPF). Currently the plan is neither legally compliant nor sound.
- 1.5 The following representations utilise the same format as the Council's response form. Each area of the PLP which is deemed to be either not legally compliant or unsound is clearly outlined below. Proposed changes to the plan in relation to policies, supporting text and the proposals map are provided.

	Agent	Client
Title	Mr	Bargate Homes c/o
First Name	Jeremy	Agent
Last Name	Gardiner	
Job Title	Senior Director	
Organisation	Pegasus Group	
Address	3 West Links Tollgate Chandlers Ford Eastleigh Hampshire	
Postcode	SO53 3TG	
Telephone	07929 788776	
Email	jeremy.gardiner@pegasusgroup.co.uk	

2.0 Plan Overall

B1 Which part of the Local Plan is this representation about?

2.1 The following comments relate to the overall Local Plan.

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan:

2.2 Paragraphs 1.5–1.6, 1.14, 1.17, 1.37, 2.12, 3.19–3.22, 3.49–3.57, 4.1–4.20, Appendix B.

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan

2.3 Policies H1, HP1, HP4, HP5, HP6, HP7, HP9, DS1, DS3, NE8, D1.

B2 Do you think the Publication Local Plan is:

Legally compliant – No

Sound – No

Complies with the duty to co-operate – No

2.4 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

B3.1 The Publication Local Plan is not Legally Compliant

2.5 The Publication Local Plan (PLP) has based its housing proposals on the annual housing target derived from the Government's draft Revised Standard Methodology published in August 2020 in its consultation "Planning for the Future". The Government's response to this consultation was published on 16th December 2020. The Government does not propose to proceed with the changes to assessing local housing need consulted on earlier this year in

"Changes to the Current Planning System"; but instead has published a revised approach to the Standard Method, which retains the method in its previous and current form except for London and 19 of the most populated cities and urban centres.

- 2.6 The key change is to apply a 35% uplift to the Standard Method for Greater London and the 19 most populated cities and urban areas in England – Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke on Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton and Brighton and Hove. The minimum housing requirement for Fareham calculated using the amended standard method therefore remains 514hpa.
- 2.7 The Government's White Paper, "Changes to the Current Planning System" (published in August 2020 alongside the "Planning for the Future" consultation) provided guidance to local planning authorities which were at or close to the Regulation 19 stage of plan-making at paragraph 43:

"Transition

43. The Government is aware that any change in the standard method will have an impact for plans that are currently under development, as authorities expend considerable resources in developing new plans. To enable an orderly transition to the revised standard method, and achieve as much short-term supply as possible while setting the right expectations for early stage plan-making, we propose that from the publication date of the revised guidance, authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination. Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate. This is to strike a balance between allowing an appropriate transition period for plans that are nearly through the process, but without causing a significant delay in planning for a higher level of need."

-
- 2.8 This transitional arrangement applies to Fareham at the time, such that the previous Standard Method (514 hpa) continued to apply for plan-making purposes in the borough in any event, but the Council chose not to follow this national guidance.
- 2.9 The National Planning Policy Framework (NPPF) states (paragraph 16 a)) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". Footnote 10 confirms that this is a legal requirement of local planning authorities in exercising their plan-making functions. Meeting the objectives of sustainable development includes "...meeting the needs of the present...". By preparing a Plan based on the revised draft Standard Methodology target of 403 dwellings per annum, the local planning authority is failing to meet its local objectively assessed need for housing, thereby failing to plan to deliver sustainable development.
- 2.10 The PPG (ID 2a-003-20190220) is clear that the standard method should be used and any other method should only be used in exceptional circumstances. It further explains that:
- "...Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."* (PPG ID 2a-015-20190220).
- 2.11 As discussed above the extant standard method identifies a requirement of 514hpa. The NPPF (paragraph 60) identifies that the current standard method provides a minimum requirement. To depart and provide a figure lower than the current Standard Method requires exceptional circumstances and must be justified by clear and robust evidence. This is absent from the Council's evidence base and as such is an unsound approach.
- 2.12 The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa) – a requirement confirmed by the Government's

announcement of 16th December 2020. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa was procedurally flawed, lacking in evidential basis, premature and misleading.

- 2.13 The NPPF (paragraph 33) also states that plans should be reviewed every 5 years and updated as necessary. The Inspector's Report on the Examination into the Fareham Local Plan Part 2 (dated 12th May 2015) included modifications which were all proposed by the Council. Its first Main Modification was "a commitment to an early review of the local plan (ie. LP1, LP2 and LP3)". This included a timetable for the local plan review between 2016 and 2018 which the Council has failed to adhere to, having previously expressed its commitment to the Inspector.
- 2.14 The Local Plan Part 3 is the Welborne Plan which was adopted in 2015. The total quantum of housing to be delivered at Welborne has reduced over the years, and the date for its commencement has repeatedly slipped back. The development is currently running about 5 years late. Recently, serious doubts have been expressed over whether it is deliverable at all given the reported funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10. The development is certainly not currently "deliverable" in NPPF terms. Nonetheless, the PLP relies heavily on the delivery of homes at Welborne as by far the most important source of its housing supply - 4,020 homes (just over 48%) out of a total suggested supply of 8,389 homes are timetabled to be completed at Welborne by 2037, and completions are included in the Council's trajectory for the first five years of the plan. Given the heavy reliance placed on a development which, at best, appears to be at serious risk of continuing to be significantly delayed, the Welborne Plan should be reviewed as a matter of urgency.
- 2.15 Given the importance of the Welborne Plan to housing delivery this is considered an issue of both soundness and legal non-compliance.

B3.2 The Publication Local Plan is not Sound

- 2.16 Paragraphs 1.5 – 1.6 of the PLP set out the "Tests of Soundness" which require

that the Plan has been "positively prepared, justified, effective and consistent with national policy". The PLP fails to meet the Tests of Soundness for the following reasons:

1. It has not been "positively prepared"

- 2.17 The Plan does not seek to, as a minimum, meet the area's objectively assessed need. Given that the Core Strategy was adopted on 4th August 2011, it is significantly out of date such that (as advised by paragraph 73 and footnote 32 of the NPPF) local housing need should be calculated using the current Standard Methodology. On this basis the local housing need target is 514 homes per annum (hpa) plus the appropriate buffer (5% or 20%). Instead, the PLP plans for 403 hpa, thereby failing to plan for the area's objectively assessed need, and failing to contribute to the achievement of sustainable development.
- 2.18 The lower housing requirement has also not been the subject of sustainability appraisal (SA). Whilst the SA re-assesses sites based upon a lower housing requirement it fails to consider the implications of a lower housing requirement, compared to the current standard method, upon the delivery of the SA objectives. Even if the lower requirement were justified by national policy, which it is not, the retention of the housing requirement at the level previously consulted upon would be a reasonable alternative.
- 2.19 The Council published an Affordable Housing Strategy in 2019. On page 14 of the Affordable Housing Strategy, it is suggested that there is a need for 3,500 affordable homes to 2036, or circa 220 per annum. This is based on the existing need for 3,000 affordable homes and an allowance of 500 homes to provide for new households and those falling into need. Given that an average of only 76 affordable homes have been built per annum in Fareham Borough since 2011, there is a significant need to boost the supply of additional affordable housing to address needs. Indeed, the delivery of affordable housing needs to almost treble. The provision of affordable housing to address this need is a significant matter.
- 2.20 It is also unclear whether the PLP has planned to adequately accommodate unmet need from other authorities. The PPG (ID 2a-010-20190220) identifies

that meeting unmet needs from neighbouring authorities as set out in a Statement of Common Ground is one reason why local housing need calculated using the current standard should be exceeded. Contrary to the advice within the PPG (ID 2a-010-20190220) there are currently no Statements of Common Ground identifying if the figure of 847 dwellings is adequate or accepted by other authorities. Rather the Council speculates that this contribution would be "ratified" by a subsequent Partnership for South Hampshire Statement of Common Ground (Duty to Co-operate Statement of Compliance, paragraph 4.5). There is, however, no evidence to support this speculation. Indeed, the only evidence presented confirms a request for Fareham to accommodate 1,000 dwellings from a single neighbouring authority. The PLP has been prepared in advance of the publication of Statements of Common Ground – as such its preparation is premature.

2.21 At paragraph 4.4 of the PLP it is stated that unmet need in the sub-region over the plan period could be "circa 10,750 dwellings". At paragraph 4.5, Fareham's "immediate neighbours" are considered, and it is confirmed that Portsmouth City Council has requested that Fareham contributes 1,000 dwellings towards its unmet need, and that Gosport is "likely to have an unmet need issue, currently estimated to be in the region of 2,500 dwellings...". The Council's 'Duty to Co-operate Statement of Compliance' identifies at paragraph 4.6 that instead of responding to the request from Portsmouth the Council is proposing to: "...take the approach that the issue of unmet need is not dealt with as specific to any authority, but as a general contribution." It is not clear how this "general contribution" has been calculated but it appears inadequate. Gosport Borough lies between Portsmouth and Fareham. It is clear that Portsmouth cannot accommodate any of Gosport's unmet need so the obvious place to accommodate it is in Fareham Borough. Therefore, if Fareham plans to deliver the unmet needs of Portsmouth and Gosport, its contribution would be 3,500 homes. However, the PLP (Table 4.1) proposes a contribution of just 847 dwellings to wider unmet need. This figure should be reviewed.

2.22 In relation to unmet need, it should also be remembered that Welborne (previously known as the North of Fareham SDA) was originally conceived by PUSH (now PfSH) as one of two SDAs which were promoted to meet the sub-regional needs of south Hampshire and brought forward in the "South East

Plan". The Inspector's Report on the Examination into the Fareham LDF Core Strategy (dated 20th July 2011) identified five Main Issues, Main Issue 1 being:

"7. The North of Fareham SDA represents the most significant and controversial element of the Core Strategy.While the principle of the SDA's development is contained in the regional strategy – policy SH2 of the South East Plan (SEP) – the justification for the proposal derives from evidence prepared by South Hampshire local authorities (the Partnership for Urban South Hampshire [PUSH]) during the SEP's preparation....The advantages of SDAs are seen as threefold: safeguarding existing towns and villages by reducing coalescence; providing more opportunities for planning gain; and achieving a critical mass to deliver sustainability benefits. The development now proposed is one of two SDAs proposed by PUSH and brought forward into the SEP. Both are aimed at meeting sub-regional housing needs and, as such, their housing totals are separated from the housing requirement for the remainder of the Boroughs concerned in the sub-regional strategy and SEP."
(our underlining)

- 2.23 However, the Council is now treating Welborne as a source of housing supply for Fareham Borough only, disregarding its planned sub-regional role. This compounds the lack of positive preparation of the PLP and starkly contrasts the Council's current approach to the delivery of housing to meet sub-regional needs with its approach of a decade ago.

2. It is not "justified":

- 2.24 The PLP's strategy for housing delivery is not appropriate, because it is based on a need figure derived from the draft revised Standard Methodology which was still the subject of public consultation at the time that the Plan was prepared. Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa) – a requirement confirmed by the Government's announcement of 16th December 2020. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa is procedurally flawed, lacking in evidential basis, premature and potentially misleading.

3. It is not "effective":

- 2.25 Fareham has decided to deliberately plan to not meet its local objectively assessed housing need, so fundamentally the plan will not be effective. This, coupled with its apparent failure to plan to contribute appropriately to the unmet housing need of the sub-region, indicates a failure to work effectively with its neighbouring authorities on cross-boundary strategic planning for housing delivery and a failure "to support the Government's objective of significantly boosting the supply of homes" (NPPF, paragraph 59). Rather, the PLP proposes to restrict the supply of homes in the plan period in a way which will exacerbate the local housing crisis.

4. It is not "consistent with national policy":

- 2.26 The PLP is not consistent with the NPPF because:
- It will not contribute to the achievement of sustainable development by not, as a minimum, planning to meet its local objectively assessed housing need;
 - It is not planning to adequately meet the unmet housing needs of neighbouring authorities in the sub-region;
 - It has not based its housing proposals on the current Standard Methodology;
 - Its strategy lacks a robust evidential justification; and
 - Its proposed housing land supply includes a majority of housing from sites which are not "deliverable" as defined by the NPPF.

B3.3 The Publication Local Plan does not Comply with the Duty to Co-operate

- 2.27 As stated at B3.1 above, it is unclear whether the PLP has planned to adequately accommodate unmet need from other authorities.
- 2.28 Against a sub-regional unmet need figure of "circa 10,750 dwellings", and in the context of both neighbouring authorities of Portsmouth City Council and

Gosport Borough Council having "unmet need issue(s)", and Havant Borough Council being expressly unable to accommodate any unmet need, the PLP (Table 4.1) proposes a contribution of 847 dwellings to wider unmet need. It is not clear how this has been calculated and it appears inadequate.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

1. Plan to meet, as a minimum, the area's objectively assessed housing need. The current Standard Methodology annual housing need figure is currently 514 hpa.
2. Provide Statements of Common Ground in relation to unmet need from neighbouring and PfSH authorities. Any agreements will need to be included as additional housing to the minimum 514hpa.
3. In any event, plan for a level of housing which contributes to the achievement of sustainable development.
4. Treat this plan as an interim plan and reaffirm the Council's commitment to undertake an urgent a review of the Welborne Plan for incorporation into a consolidated early review of this plan.
5. The Council has not undertaken SA of all reasonable alternative housing requirements.
6. The Council has not planned to meet current housing needs, opting instead to phase its housing supply in a way which will exacerbate the current significant under-supply problems.

2.29 Consequential to the above, the Council must allocate additional sites for housing in this interim plan (ahead of the urgent review of the Welborne Plan) to meet its confirmed housing target of 514 hpa, including the allocation of our client's interest at Land adjacent to 75 Holly Hill Lane, Sarisbury for approximately 30 dwellings.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

2.30 The role of plan-making in contributing to the achievement of sustainable development is a legal requirement (Section 39(2) of the Planning and

Compulsory Purchase Act 2004).

- 2.31 Revisions to the plan so that it plans, as a minimum, to meet the local objectively assessed need for housing, meet affordable housing need and adequately contribute to meeting unmet need would assist the PLP to meet the Tests of Soundness.

3.0 Specific Proposed Changes

B4c Suggested revised wording of any policy or text

Policy H1: Housing provision

- 3.1 Completely revise the proposed housing target on the basis of the current Standard Methodology figure for the Borough of a minimum of 514 hpa plus an appropriate contribution to meeting sub-regional unmet needs.
- 3.2 Ensure that the revised housing target includes the delivery of a minimum of 220 affordable homes per annum.
- 3.3 Plan to deliver the revised housing target including a five-year supply of deliverable sites. In this regard, Welborne (the supply of housing from which is relied on heavily by the PLP) cannot currently be regarded as "deliverable" as defined in the NPPF.
- 3.4 Consequential updates to paragraphs 4.1 – 4.20 including Tables 4.1, 4.2, 4.3.
- 3.5 Consequential revisions to the list of Housing Allocation Policies under paragraph 4.20 to include allocations sufficient to deliver the revised housing and affordable housing targets, including the allocation of Land adjacent to 75 Holly Hill Lane, Sarisbury for approximately 30 dwellings.
- 3.6 Policy H1 also seeks to identify a 'phased' requirement. The overall supply is described as at least 8,389 dwellings - this is just 165 dwellings greater than the requirement when the correct local housing need standard method is applied. Given the need to provide for unmet needs from neighbouring authorities this is clearly insufficient and as such further allocations are required.
- 3.7 Policy H1 seeks to 'phase' this supply identifying the following:
 - Approximately 2,250 dwellings (averaging 450 dwellings per annum) between 2021/22 and 2025/2613;

- Approximately 2,400 dwellings (averaging 480 dwellings per annum) between 2026/27 and 2030/31; and
- Approximately 3,750 dwellings (averaging 625 dwellings per annum) between 2031/32 and 2036/2037.

- 3.8 This phasing clearly will not meet the overall plan requirement. The rationale for this phasing is due to an anticipation that many of the housing allocations will begin to deliver later in the plan period. This is simply a factor of the sites chosen rather than an evidence-based approach to need. The net effect is that in the early part of the plan period the full need will not be met, exacerbating the current significant housing land supply shortfall in the Borough. This will mean households will either be unable to form or will be forced to move elsewhere to find appropriate accommodation. This not only has an impact upon affordability through increased demand but also has implications for social mobility and health for young and old alike.
- 3.9 The lack of housing to meet needs in the short-term is exacerbated by recent under-delivery of both market and affordable housing. The Council recognises it has under-delivered in recent years due to the reference to the need for a 20% buffer in accordance with NPPF, paragraph 73 (paragraph 4.16, PLP).
- 3.10 The housing requirement in the PLP should not be phased to manufacture a five-year housing land supply in the short-term. The plan should seek to address housing need now – to do otherwise is not justified or effective.
- 3.11 The second part of Policy H1 identifies the sources of supply. Whilst our client does not wish to comment upon individual sites, we do have significant concerns that the sources of supply will not deliver the plan period housing requirement in full. The PLP, paragraph 4.16, acknowledges that many of the chosen sites will not deliver until later in the plan period therefore any slippage in timescale could well push delivery beyond the plan period. Furthermore, the Council is heavily reliant upon delivery at Welborne. Within our comments upon the Plan overall we identify the need for delivery from this site to be reviewed and indeed question whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10.

- 3.12 Furthermore, the Council cannot currently demonstrate a five-year housing land supply. The Council's most recent assessment of its five-year housing land supply suggests a 4.03-year supply. This assessment appears optimistic given recent appeal decisions which identify it is closer 2.4 years. Given these shortcomings it is essential that the PLP seeks to address this under-supply in the short-term.

Section 3: Development Strategy

- 3.13 This section is substantially focussed on restricting development outside the existing settlement policy boundaries of urban areas. This is in conflict with the NPPF, paragraph 11, which advises that "Plans and decisions should apply a presumption in favour of sustainable development" and that "For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change".

- 3.14 The highly restrictive strategic policy approach introduced into the PLP does not accord with this national guidance.

- 3.15 Paragraph 3.9 of the PLP states:

"Recent planning appeal decisions in the Borough have highlighted the need to consider the designation of valued landscapes as part of the Local Plan. Previous Local Plans have included the demarcation of 'Areas of Special Landscape Quality' in the Borough which were used to help shape planning strategy and decisions on planning applications. These areas were the Meon, Hamble and Hook valleys, Portsdown Hill and the Forest of Bere. Both the Landscape Assessment (2017), and the more recent 'Technical Review of Areas of Special Landscape Quality and the Strategic Gaps' (2020) still recognise the intrinsic character and distinctiveness of these relatively undeveloped areas of the Borough and so their locations have been used to shape the development strategy. There is a presumption against major development in these areas, unless it can be demonstrated through a landscape assessment that the quality

and distinctiveness of the landscape character can be conserved. For these reasons there remain no development allocations in these areas." (our underlining)

Our client objects to the identification of the Areas of Special Landscape Quality (ASLQ) in the borough, and particularly to the presumption against development in ASLQ and against allocation any sites for development within these areas. This is discussed in detail in the section relating to Policy DS3: Landscape below.

Policy DS1: Development in the Countryside

- 3.16 For housing development which is brought forward in the absence of a 5-year housing land supply, Policy HP4 applies. This will necessarily introduce new built form onto greenfield sites adjacent or well related to existing urban area boundaries. This will inevitably cause a change to the landscape character of the site and immediately adjacent land. Criteria ii) and iii) require proposals to "conserve and enhance landscapes" and "recognise the intrinsic character and beauty of the countryside". It is not clear which "landscapes" are being referred to – presumably this should be restricted to formally designated landscapes or defined "valued" landscapes because otherwise it could be applied to every area of countryside. It is also not clear how, for example, a housing development can "conserve and enhance" a landscape – relevant measures should be defined. Moreover, it is not clear how the extent to which a proposal has recognised "the intrinsic character of the beauty of the countryside" can be measured. After all, those attributes can be "recognised" but then disregarded. It is true that every area of countryside has a "character" but not that every area of countryside has "beauty".
- 3.17 Criterion v) should include an exception for development which is brought forward under Policy HP4, where the application of the "tilted balance" would allow the loss of BMVAL.
- 3.18 Paragraph 3.39 fails to explain how this policy works in relation to housing policies.

Policy DS3: Landscape

- 3.19 This draft policy designates about a quarter of the land area of the Borough as "Areas of Special Landscape Quality" (as shown on Figure 3.3).
- 3.20 From the commentary provided in paragraph 3.49, it appears that the Council is equating its 'Areas of Special Landscape Quality' (ASLQ) with 'valued landscapes'. This is questionable. All landscapes are valued at some level by different people. NPPF paragraph 170 triggers a need to consider when landscape value is just a local consideration, or when landscapes are more 'out of the ordinary'. Fundamentally, for a landscape to be a valued landscape, it does not have to be designated - so by designating the ASLQ (or by creating a valued landscape designation) the Council is at risk of creating a policy that is irrelevant, because guidance says that non-designated landscapes can be valued, so site-by-site assessments will be required in any event. **Given that Policy DS3 is irrelevant, it is unnecessary and it should be deleted.**
- 3.21 However, if it is held that Policy DS3 should not be deleted, the following comments apply.
- 3.22 Paragraph 3.55 states that "...all parts of the Borough have some landscape quality and may be sensitive to landscape change". This is ambiguous. All landscape will be of 'a quality' but quality (in GLVIA3 aligned with condition) is only one consideration of landscape sensitivity.
- 3.23 With regard to "How the policy works", paragraph 3.56 states that "*The criteria within the policy (points a-g) are derived from the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) published by the Landscape Institute.*". The GLVIA3 is an extensive and diverse document and, if it is to be used as basis for this policy then a specific reference or explanation should be provided as to how points a-g have been derived.
- 3.24 Paragraph 3.57 refers to the submission of "...a proportionate Landscape Assessment". In the event that Policy DS3 is not deleted, this should be amended to require the submission of a 'Landscape and Visual Impact Assessment'. There are many applications of Landscape Assessment and

several forms of reporting. Reference to LVIA would be specific and clear as to what is required (and incidentally relates better to the approaches set out in GLVIA3).

3.25 Having specific regard to our client's land interest adjacent to 75 Holly Hill Lane in Sarisbury, the site has previously been promoted through FBC's SHELAA dated September 2020 (Site ID 1005) and was discounted solely because it is located within an ASLQ. Consequently, our client has appointed Terra Firma Consultancy to review this matter and a Landscape Response is attached to these representations at Appendix 1, together with an Opportunities and Constraints Plan for the site.

3.26 In summary, it is considered that if Policy DS3 is not deleted, it should better allow for flexibility when it can be proven that parcels of land within the ASLQ, when taken in isolation and studied in depth, can accommodate sensitive small-scale development. It is considered that our client's site has capacity for development without detriment to the wider Landscape Character Area and would also create opportunities for landscape enhancement and protection. Further site-specific details for Land adjacent to 75 Hilly Hill Lane are provided at the end of this section.

Policy HP1: New Residential Development

3.27 This policy relates to all new housing proposals. However, it only envisages housing coming forward outside Urban Area boundaries through either the conversion of a non-residential building or as a replacement dwelling. It should also cross-refer to Policy HP4 which allows housing to come forward on land outside Urban Area boundaries if the Council cannot demonstrate a Five-Year Housing Land Supply.

3.28 Therefore add:

"c) It is for additional housing in circumstances where the Council cannot demonstrate a Five Year Housing Land Supply and Policy HP4 applies."

Policy HP4: Five-Year Housing Land Supply

3.29 The housing requirement set out in Policy H1 must be re-calculated using the current Standard methodology as described in our comments on draft Policy H1 above.

3.30 Paragraph 5.24 infers that Policy HP4 reproduces Local Plan Part 2 Policy DSP40. However, the third criterion in Policy DSP40 was as follows:

"iii) The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;"

3.31 This has been replaced in Policy HP4 by:

"c) The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant, does not significantly affect the integrity of a Strategic Gap;"

3.32 If a five-year housing land supply cannot be demonstrated, then in accordance with the NPPF, paragraph 11d, the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply. This policy may therefore be judged to be inappropriate because it adds restrictions which may prevent sustainable sites from coming forward. However, if such a policy is held to be necessary, then a faithful reproduction of Policy DSP40 iii) is strongly preferred. See our comments on Policy DS1 in this regard.

Policy HP5: Provision of Affordable Housing

3.33 This draft policy states that "affordable housing must be provided" (our underlining) in the following proportions:

- i. At least 10% as Social Rent; and
- ii. At least 55% as Affordable Rent or Social Rent; and

- iii. The remainder, but no less than 10% as Affordable Home Ownership.
- iv. The mix of property size and type should reflect the local need and the site characteristics.

3.34 As drafted this policy is not sufficiently flexible. As acknowledged at paragraph 5.36, development viability will be an issue on some sites. As acknowledged at paragraph 5.39, occasionally the tenure mix prescribed by the policy will not be appropriate; and as acknowledged at paragraph 5.34, other exceptional circumstances may arise (such as abnormal costs) which dictate that a non-standard provision of affordable housing is demonstrated to be appropriate.

3.35 Therefore, amend the first part of the policy to read:

"Sites that can accommodate 10 or more dwellings or sites with an area of 0.5 hectares or more shall normally provide: ..."

3.36 And amend the second part of the policy to read:

"The affordable housing shall normally be provided in accordance with the following proportions: ..."

Policy HP7: Adaptable and Accessible Dwellings

3.37 This draft policy states:

"Development proposals for all new dwellings shall provide:

- a) At least 15% of all new dwellings at Category 2 standard; and
- b) On schemes of over 100 dwellings (gross), at least 2% of private housing and 5% of affordable housing shall be provided as wheelchair accessible Category 3 properties."

3.38 Similar to Policy HP5 above, as drafted this policy is not sufficiently flexible. It is acknowledged that this policy is based on the requirements of Part M of the Building Regulations but it must allow for circumstances arising which mean that these requirements cannot be delivered (fully or otherwise).

3.39 Therefore, amend the first line of the policy to read:

**"Development proposals for all new dwellings shall normally provide:
..."**

3.40 Paragraph 5.57 of the supporting text states:

"The cost to development for providing Category 2 and 3 is relatively minimal. Flexibility for additional costs have been factored into the viability evidence base and this indicates that the requirements for Category 2 and 3 should have no detrimental impact on the viability of schemes in the Borough..."

3.41 This statement is strongly disputed. In reality, these costs will not be factored into a developer's viability calculations (particularly in relation to Category 3 requirements) because option agreements / conditional contracts will have already been agreed on the sites that the Council want to see come forward, so these costs will not have been anticipated. The Category 3 requirements must be substantiated by quantified evidence of the need for such units in the Borough.

Policy HP9: Self and Custom Build Homes

3.42 This policy requires 10% of dwellings on sites of 40 dwellings or more to be provided for Self and Custom Build Homes. The practical implications of managing self or custom build developments on sites otherwise being constructed by housing developers or housing associations must be carefully considered. There is concern that 40 dwellings is too small a threshold at which to introduce this requirement due to the potentially onerous construction management implications which will arise. It would be preferable for the Council to allocate specific sites for self and custom build developments instead of requiring this element on all housing developments of 40 dwellings or more.

3.43 It is noted that, as stated at paragraph 5.70, only 1% of housing plots at Welborne are required to be provided for self or custom build under the Welborne Plan (2015). Strategic allocations such as Welborne provide the ideal opportunity for parcels of land to be allocated for self or custom build, so that

opportunity should not be missed. This should be addressed in the review of the Welborne Plan which is overdue and necessary.

Policy D1: High Quality Design and Place Making

- 3.44 This is a highly aspirational policy which sets out ten criteria ("key characteristics of high quality design") against which all development proposals will be judged "to ensure the creation of quality places." It is not clear what a "quality place" is – this should be defined. The ten criteria push the "bar" too high – all proposals cannot be expected to "create places that are attractive, memorable, distinctive and of strong character", for example, laudable though those aspirations are. In practice, very few proposals would receive planning permission if assessed against this requirement.

Appendix B: Housing Trajectory

- 3.45 This appendix must be updated as it does not reflect the quantum of housing required to meet the local needs. It also projects completions of 975 homes in 2023/24 and 961 homes in 2024/5, which are at risk due to the delays to Welborne which continue. Completions from Welborne should be shown separately as previously.

Allocation of Land adjacent to 75 Holly Hill Lane, Sarisbury

- 3.46 Our client's land interest adjacent to 75 Holly Hill Lane in Sarisbury has previously been promoted through the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) dated September 2020. The site is discounted solely for the reason that it is located within a SLQA and our client's objection to this is set out above.
- 3.47 Otherwise, the SHELAA confirms that the principle of highway access to the site is acceptable, subject to allowing for the turning of refuse vehicles within the design of the access road, which could be addressed. It is confirmed that there are no known conservation constraints or noise/air quality constraints, and that the site is not within an identified area of archaeological potential. The SHELAA suggests that there is the potential for moderate to high quality

habitats and ecological interest within the woodland areas, but this could be assessed and appropriately mitigated.

- 3.48 In terms of its accessibility and sustainability, the SHELAA confirms that the site is located within 800m of accessible green space or play space, within 800m of a community/leisure facility, within 1,200m of a Primary School and within 1,600m of a Secondary School. It is also noted that the site is located 0.5 miles (by road) to the south of the A27 and its associated local facilities and services. There are also bus routes that run along Barnes Lane to the east, and the A27.
- 3.49 The SHELAA concludes that the site is both available and achievable but that it is not suitable due to its location within an ASLQ.
- 3.50 The Landscape Response prepared by Terra Firma Consultancy, enclosed at Appendix A, includes an Opportunities and Constraints Plan for the site which identifies an indicative developable area extending to approximately 0.93 hectares. On the basis of a development density of 30-35 dph, this would equate to the provision of between 28-33 dwellings on the site.
- 3.51 On the basis of the above, the Council is encouraged to allocate Land adjacent to 75 Holly Hill Lane in Sarisbury for approximately 30 dwellings. This site is controlled by a highly reputable local housing developer – Bargate Homes – who has a strong local track record of delivery and is keen to bring it forward for development immediately, such that the site can make an important contribution to the Council's five-year housing land supply.

4.0 Participation at the Examination Hearing Sessions

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

4.1 Yes, we want to take part in a hearing session.

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

4.2 To contribute to testing the legal compliance and soundness of the PLP for the reasons set out in these representations.

APPENDIX 1

Landscape Response prepared by Terra Firma Consultancy and associated Opportunities and Constrains Plan

Landscape Response to Representation to Fareham Local Plan 2037
Land adjacent to 75 Holly Hill Lane, Sarisbury
On behalf of Bargate Homes

Areas of Special Landscape Quality

Section 3: Development Strategy and Policy DS3: Landscape

Bargate Homes does not support the inclusion of ASQL within the Fareham Local Plan 2037, for the reasons set out in the representations prepared by Pegasus Group. However, if such a policy is held to be necessary, this response has been prepared by Terra Firma Consultancy on behalf of Bargate Homes to assess the development potential of the site in landscape terms.

The Fareham Local Plan 2037 (Publication Local Plan) states at paragraph 3.9 that:

"Previous Local Plans have included the demarcation of 'Areas of Special Landscape Quality' in the Borough which were used to help shape planning strategy and decisions on planning applications... Both the Landscape Assessment (2017), and the more recent 'Technical Review of Areas of Special Landscape Quality and the Strategic Gaps' (2020) still recognise the intrinsic character and distinctiveness of these relatively undeveloped areas of the Borough and so their locations have been used to shape the development strategy. There is a presumption against major development in these areas, unless it can be demonstrated through a landscape assessment that the quality and distinctiveness of the landscape character can be conserved. For these reasons there remain no development allocations in these areas."

The land adjacent to 75 Holly Hill Lane lies at the eastern extent of the proposed Area of Special Landscape Quality (ASLQ) 2: Lower Hamble Valley whose boundary is based on Landscape Character Area (LCA) 2: Lower Hamble Valley as defined in The Fareham Landscape Assessment (2017). No clear explanation is given for why the boundaries of the ASLQ align with those of the LCA other than the LCA represent the land outside the settlement boundaries and it is a convenient sub-division.

Each LCA was subdivided into Local Landscape Character Areas (LLCA) to allow a more detailed analysis and these examined as part of the Assessment of Sensitivity and Development Potential which forms part 2 of the Fareham Landscape Assessment.

"The sensitivity assessment... [provides] detailed information and judgements on the sensitivity of areas of landscape beyond the existing defined settlement boundaries, and the potential impacts that new development might have on their particular characteristics, qualities and valued attributes."

LCA 2 was subdivided into 5 Local Landscape Character Area (some of which appear more than once) and these analysed:

"The assessment of sensitivity is concerned with analysing the ability of the different local landscape character areas beyond the urban area boundary to accommodate development without unacceptable adverse effects upon four specific roles:

- *As part of the Borough's landscape resource;*
- *As part of the visual environment enjoyed by people within the Borough (i.e. their visual amenity);*
- *As part of the setting and identity of urban areas within the Borough; and*
- *As part of the network of Green Infrastructure within the Borough and wider context."*

The land adjacent to 75 Holly Hill Lane, Sarisbury lies within LLCA 2.1b which is described as comprising:

"...the main area of semi-rural landscape within this LLCA. The valley side sweeps westwards down to the foreshore of the River Hamble from a highpoint of c.43m at the northern end and is indented by a series of minor tributary valleys which produce quite complex topography, clothed in a diverse patchwork of woodland, farmland, parkland and the gardens/grounds of private houses. The northern part of the area contains Brooklands, a Georgian country house (Grade II Listed), surrounded by designed gardens and parklands which include extensive woodland and lawned terraces sweeping down to the River Hamble, and are of high landscape quality. Further south is an area of landscape characterised by a mosaic of small scale pastures and larger fields under grassland, mature hedgerows, copses and more extensive areas of woodland, occupying the slopes of a gentle, minor valley. Apart from a marina development on the foreshore, there is little built development on the lower slopes but the upper slopes are lined with large detached houses set within wooded or well-treed plots and accessed by narrow, enclosed lanes.*

The abundance of tree cover means that this development is not conspicuous and the landscape retains a pastoral, semi-rural and relatively unspoilt character. Beyond this lies the thickly wooded landscape around Holly Hill Woodland Park, a mid and Late 19th century landscaped woodland park (owned and managed by the Borough Council as a public amenity), which occupies another minor tributary valley of the Hamble and includes lakes and woodland walks. As well as its value as a historic designed parkland, the woodland landscape is of considerable ecological and amenity value and connects into the woodlands and inter-tidal habitats of the Hamble Estuary which are covered by multiple designations."

The site itself, which is categorised as Landscape Type 'Horticulture & Smallholdings: Small Scale, lies to the west of one of these 'minor tributary valleys' and comprises 'small scale pastures' albeit very neglected. To the west of the site on Holly Hill Lane are 'large detached houses set within wooded or well-treed plots' which include plots which have been infilled and redeveloped.

It is not clear why the site was not included within LLCA 2.2a as were the two other areas of former nursery sites within the LCA which lie to the south (See Figure 'Landscape Character Types', Sensitivity Assessment, pg. 45). Bargate would argue that the site in question shares some of the characteristics of LLCA 2.2a:

"...the evidence of dereliction and lack of management of buildings and land has an adverse effect upon the quality and condition of the landscape. The character and quality of the landscape has already been affected by urban influences and landscape

value is relatively low and, therefore, tolerant of change. The presence of a good structure of woodland, hedgerows and trees provides opportunities for integration of new buildings within the existing field pattern, without significant adverse effects upon landscape resources."

It is noted that LLCA 2.2a has been excluded from the ASLQ designation due to its '*suburban fringe character with some poor elements*' (The Technical Review of Areas of Special Landscape Quality and Strategic Gaps), something that it shares with the site.

Despite the poor condition of the site and belonging to the same LCA as 2.2a the site has been placed within LLCA 2.1b and has been scored as a 'high match' against the GLVIA3 Box 5.1 criteria by the Technical Review of Areas of Special Landscape Quality and Strategic Gaps defined as:

"The area has exceptional scenic quality and is in good condition. It has an unspoilt rural character that is coherent and intact, with topographical and visual unity. It has many features of note, including natural and cultural designations. It has a high value for recreation. It has clearly demonstrable physical attributes and is an integral part of a wider 'valued ;landscape'. There are no, or very few detracting influences."

Bargate assert that the site, when studied individually does not match these criteria and therefore does not count as a 'high match' and does not belong within an ASLQ.



Figure 1: View south-east across site and stream valley showing poor landscape condition.



Figure 2: View west towards rear gardens of properties on Holly Hill Lane showing suburbanising influences

Bargate believe that despite the more detailed subdivision of the LCA into LLCA, and accepting the somewhat incongruous inclusion of the site within LLCA2.1b, there is still a need for further refinement before being used as the basis of the ASLQ designation. The Planning Context diagram (Sensitivity Assessment, pg. 43) clearly illustrates that LLCA 2.1b is, in effect, a landscape of two very different types. The north and south include landscapes with multiple designations (SINC, Historic Parks and Gardens, Conservation Areas, Country Parks, Ancient Woodlands, Local Nature Reserves, SSSI, SPA, RAMSAR) whereas the central section is free of such designations.

The Technical Review of Areas of Special Landscape Quality and Strategic Gaps (2020) states that:

"Inspectors' reports suggest that for a landscape to be considered 'valued', it should show some demonstrable physical attribute, form an integral part of a wider 'valued' landscape and have something 'special' or out of the ordinary that can be defined."

Bargate agree with the Sensitivity Assessment's assertion that:

"The presence of national or local landscape designations will signify recognition of high landscape quality, but they are not the sole indicator of value and the absence of a designation does not mean the landscape resource is not of high quality or valued in a local context."

Nevertheless, it is clear that these multiple designations contribute to this LLCA being of 'high' sensitivity and are also the most sensitive areas within this LLCA.

Bargate would assert that a more detailed, independent study of the site such as the Landscape and Visual Evidence Appraisal (LVEA) they commissioned, reveals that the site itself is of much lower sensitivity than the wider LLCA due to the impact of neighbouring properties, its former use, low level of connectivity and poor condition and that as the Sensitivity Study states:

"Further development of a similar kind (i.e. individual properties set within well-treed plots) could potentially be accommodated without altering this character, but more extensive development within the more open parts of the area, or which would result in loss of woodland/tree cover is likely to have unacceptable landscape impacts.

In area 2.1b the most sensitive areas from a visual perspective are the parklands surrounding Brooklands (where intrusion of development could have a major impact on the setting of the Listed Building and views across the River Hamble), the woodland landscape of Holly Hill Park (where there is extensive public access, highly sensitive viewers and high quality views, albeit restricted within wooded areas) and the more open, visually exposed slopes of the central valley area, where development may be visible from the river, PRow network and surrounding properties, intruding on high quality views. The potential for development in these areas is highly restricted. However, there may be some potential for development within the well-treed parts of the valley tops where it could be absorbed without substantial adverse influence on views or visual amenity, for example within and around existing residential areas along Holly Hill Lane and Barnes Lane.

The importance of the area in respect of settings lies with its heavily wooded, semi-rural and essentially unbuilt character as a high quality setting for the River Hamble and the western edge of the Borough. Any major loss of tree cover or extension of urban form that would intrude visually and weaken this role would be damaging, but there may be some potential for small scale development to be integrated without compromising the area's overall character or integrity."

Bargate would put the case that the land to adjacent to 75 Holly Hill Lane falls into the category of developable area and could therefore accommodate small scale development without detriment to the wider area. The LVEA highlighted the most sensitive features of the site as the topography, hydrology and the vegetation associated with the stream and the proximity of Holly Hill Park to the east. Sensitively design proposals which safeguard and enhance these, through careful design and siting and enhancing existing green infrastructure could also mitigate the negative impact of the rear garden boundaries of the existing properties, the poor condition of the site and bring benefits to the biodiversity of the stream corridor through enhanced planting and management.

Strategic Policy DS3: Landscape Areas of Special Landscape Quality states that:

"Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced."

Bargate consider that the phrase '*protected and enhanced*' lacks clarity and flexibility and might be used as a barrier to the kind of sensitive small-scale development considered acceptable by the Fareham Landscape Assessment and discussed above. The phrase '*protected and enhanced*', without further qualification, appears contradictory when applied to sites which are degraded and of poor quality.

If the identification of ASQL within the Fareham Local Plan 2037 is held to be necessary, it is considered that the land adjacent to 75 Holly Hill Lane shares some characteristics with the lower sensitivity LLCA 2.2a, which is excluded from the ASLQ, and that Strategic Policy DS3 should better allow for flexibility when it can be proven that parcels of land within the ASLQ, when taken in isolation and studied in depth, can accommodate the kind of development referred to above. It is considered that the site in question has capacity for development without detriment to the wider LCA and would also create opportunities for landscape enhancement and protection.

A copy of the Indicative Opportunities and Constraints Plan that informed the Landscape and Visual Evidence Appraisal is provided at the end of this appendix and indicates the approximate developable area of the site.

Figure 21 - Opportunities and constraints plan



Keely, Lauren

From: Consultation
Sent: 18 December 2020 15:41
To: Planning Policy
Subject: Bargate Homes (on behalf of Pegasus Group) response
Attachments: Fareham LP 2037 Reps_Bargate Homes_Old Street Stubbington_Dec 2020.pdf

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Jeremy Gardiner <[REDACTED]>
Sent: 18 December 2020 13:59
To: Consultation <Consultation@fareham.gov.uk>
Subject: Fareham Local Plan 2037 - Publication Local Plan (reg.19): Representations on behalf of Bargate Homes regarding Land West of Old Street, Stubbington

Dear Sir or Madam,

On behalf of our client, Bargate Homes, please find attached representations on the Publication Local Plan. The representations relate both to the overall plan and to Land West of Old Street, Stubbington which is proposed as a housing allocation for about 75 dwellings.

Please confirm receipt of these representations.

Yours faithfully,

Jeremy Gardiner
Senior Director (Planning)

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

3 West Links | Tollgate | Chandlers Ford | Eastleigh | Hampshire | SO53 3TG

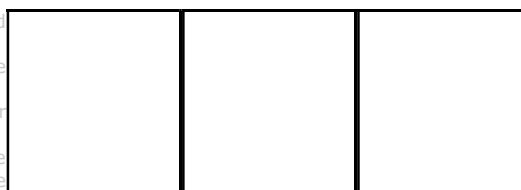


Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



www.pegasusgroup.co.uk

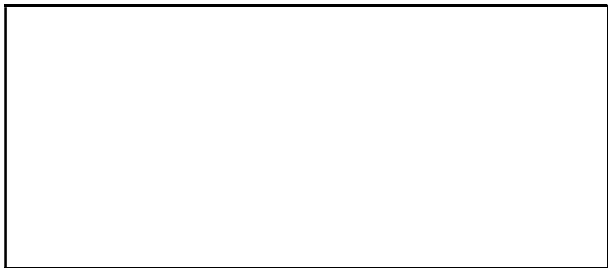
Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.
This email and any associated files, is intended for the exclusive use of the addressee only.
If you are not the intended recipient you should not use the contents nor disclose them to any other person.
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



☐ Please consider the environment before printing this email message.

*****IMPORTANT INFORMATION REGARDING PEGASUS GROUP & CORONAVIRUS / COVID-19*****

After the extraordinary events of 2020, may we wish you a peaceful Christmas and a Happy New Year.
Our company will take a break over the festive period so Pegasus Group will close from 5.30pm on **Wednesday 23rd December 2020** and reopen at 9am on **Monday 4th January 2021**



FAREHAM LOCAL PLAN 2037 REPRESENTATIONS

LAND WEST OF OLD STREET, STUBBINGTON

ON BEHALF OF BARGATE HOMES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Jeremy Gardiner & Trevor Moody



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0 Introduction.....Error! Bookmark not defined.

2.0 Plan Overall3

3.0 Specific Proposed Changes12

4.0 Participation at the examination hearing sessions.....26

1.0 Introduction

- 1.1 The following representations are by Pegasus Group on behalf of our client, Bargate Homes. These representations are consistent with and build upon the previous representations submitted to the Council by WYG in relation to this site in response to the Fareham Draft Local Plan 2036 Supplement in February 2020, and we ask that those previous representations are also considered alongside this submission because their content is not repeated here.
- 1.2 Our client has an interest in **land to the west of Old Street, Stubbington** which was previously the subject of development proposals for up to 160 (reduced to 150) new homes (planning application P/17/1451/OA refused on 23 March 2018, and appeal ref. APP/A1720/W/18/3200409 dismissed on 22 January 2019 refer). Since this appeal decision, and in the light of the Inspector's reasoning, extensive belts of strategic woodland planting have been undertaken at the site which will have the effect of visually detaching part of the site from the Meon Valley and creating a more modest sustainably located site for about 75 new homes on the edge of the urban area of Stubbington. Our client is strongly of the view that these material changes of circumstances at the site, coupled with the need for the Council to meet its local housing target of a minimum of 514 homes per annum, justify the allocation of the site for about 75 dwellings in the local plan.
- 1.3 Our client is an important stakeholder within Fareham and is keen to work with the Council to produce a plan which is legally compliant and meets the tests of soundness set out within the National Planning Policy Framework (NPPF). Currently the plan is neither legally compliant nor sound.
- 1.4 The following representations utilise the same format as the Council's response form. Each area of the Publication Local Plan (PLP) which is deemed to be either not legally compliant or unsound is clearly outlined below. Proposed changes to the plan in relation to policies, supporting text and the proposals map are provided.

	Agent	Client
Title	Mr	Bargate Homes c/o
First Name	Jeremy	Agent
Last Name	Gardiner	
Job Title	Senior Director	
Organisation	Pegasus Group	
Address	3 West Links Tollgate	

	Chandlers Ford
	Eastleigh
	Hampshire
Postcode	SO53 3TG
Telephone	
Email	jeremy.gardiner@pegasusgroup.co.uk

2.0 Plan Overall

B1 Which part of the Local Plan is this representation about?

2.1 The following comments relate to the overall Local Plan.

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan:

2.2 Paragraphs 1.5 - 1.6, 1.14, 1.17, 1.37, 2.12, 3.19 - 3.22, 3.43, 3.46, 3.49 - 3.57, 4.1 - 4.20, Appendices B and C.

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan

2.3 Policies H1, HP4, HP5, HP7, DS1, DS2, DS3, E2, E3, NE5, D1.

B1c Which part of the Policies Map

2.4 Remove Strategic Gap designation from Land West of Old Street, Stubbington.

B2 Do you think the Publication Local Plan is:

Legally compliant - No

Sound - No

Complies with the duty to co-operate - No

2.5 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

B3.1 The Publication Local Plan is not Legally Compliant

2.6 The Publication Local Plan (PLP) has based its housing proposals on the annual housing target derived from the Government's draft Revised Standard Methodology published in August 2020 in its consultation "Planning for the Future". The Government's response to this consultation was published on 16th December 2020. The Government does not propose to proceed with the changes to assessing local

housing need consulted on earlier this year in "Changes to the Current Planning System"; but instead has published a revised approach to the Standard Method, which retains the method in its previous and current form except for London and 19 of the most populated cities and urban centres.

2.7 The key change is to apply a 35% uplift to the Standard Method for Greater London and the 19 most populated cities and urban areas in England – Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke on Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton and Brighton and Hove. The minimum housing requirement for Fareham calculated using the amended standard method therefore remains 514hpa.

2.8 The Government's White Paper, "Changes to the Current Planning System" (published in August 2020 alongside the "Planning for the Future" consultation) provided guidance to local planning authorities which were at or close to the Regulation 19 stage of plan-making at paragraph 43:

2.9 "Transition

43. The Government is aware that any change in the standard method will have an impact for plans that are currently under development, as authorities expend considerable resources in developing new plans. To enable an orderly transition to the revised standard method, and achieve as much short-term supply as possible while setting the right expectations for early stage plan-making, we propose that from the publication date of the revised guidance, authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination. Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate. This is to strike a balance between allowing an appropriate transition period for plans that are nearly through the process, but without causing a significant delay in planning for a higher level of need." (our underlining)

2.10 This transitional arrangement applied to Fareham at the time, such that the previous Standard Method (514hpa) continued to apply for plan-making purposes in the borough in any event, but the Council chose not to follow this national

guidance.

- 2.11 The National Planning Policy Framework (NPPF) states (paragraph 16 a)) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". Footnote 10 confirms that this is a legal requirement of local planning authorities in exercising their plan-making functions. Meeting the objectives of sustainable development includes "...meeting the needs of the present...". By preparing a Plan based on the Consultation draft Standard Methodology target of 403 dwellings per annum, the local planning authority is failing to meet its local objectively assessed need for housing, thereby failing to plan to deliver sustainable development.
- 2.12 The PPG (ID 2a-003-20190220) is clear that the standard method should be used and any other method should only be used in exceptional circumstances. It further explains that:
- 2.13 *"...Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."* (PPG ID 2a-015-20190220).
- 2.14 As discussed above the extant standard method identifies a requirement of 514hpa. The NPPF (paragraph 60) identifies that the current Standard Method provides a minimum requirement. To depart and provide a figure lower than the current Standard Method requires exceptional circumstances and must be justified by clear and robust evidence. This is absent from the Council's evidence base and as such is an unsound approach.
- 2.15 The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa) – a requirement confirmed by the Government's announcement of 16th December, 2020. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the Consultation revised Standard Methodology figure of 403 hpa was procedurally flawed, lacking in evidential basis, premature

and misleading.

- 2.16 The NPPF (paragraph 33) also states that plans should be reviewed every 5 years and updated as necessary. The Inspector's Report on the Examination into the Fareham Local Plan Part 2 (dated 12th May 2015) included modifications which were all proposed by the Council. Its first Main Modification was "a commitment to an early review of the local plan (ie. LP1, LP2 and LP3)". This included a timetable for the local plan review between 2016 and 2018 which the Council has failed to adhere to, having previously expressed its commitment to the Inspector.
- 2.17 The Local Plan Part 3 is the Welborne Plan which was adopted in 2015. The total quantum of housing to be delivered at Welborne has reduced over the years, and the date for its commencement has repeatedly slipped back. The development is currently running about 5 years late. Recently, serious doubts have been expressed over whether it is deliverable at all given the reported funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10. The development is certainly not currently "deliverable" in NPPF terms. Nonetheless, the PLP relies heavily on the delivery of homes at Welborne as by far the most important source of its housing supply - 4,020 homes (just over 48%) out of a total suggested supply of 8,389 homes are timetabled to be completed at Welborne by 2037, and completions are included in the Council's trajectory for the first five years of the plan. Given the heavy reliance placed on a development which, at best, appears to be at serious risk of continuing to be significantly delayed, the Welborne Plan should be reviewed as a matter of urgency.
- 2.18 Given the importance of the Welborne Plan to housing delivery this is considered an issue of both soundness and legal non-compliance.

B3.2 The Publication Local Plan is not Sound

- 2.19 Paragraphs 1.5 – 1.6 of the PLP set out the "Tests of Soundness" which require that the Plan has been "positively prepared, justified, effective and consistent with national policy". The PLB fails to meet the Tests of Soundness for the following reasons:

1. It has not been "positively prepared":

- 2.20 The Plan does not seek to, as a minimum, meet the area's objectively assessed

need. Given that the Core Strategy was adopted on 4th August, 2011, it is significantly out of date such that (as advised by paragraph 73 and footnote 32 of the NPPF) local housing need should be calculated using the current Standard Methodology. On this basis the local housing need target is 514 homes per annum (hpa) plus the appropriate buffer (5% or 20%). Instead, the PLP plans for 403 hpa, thereby failing to plan for the area's objectively assessed need, and failing to contribute to the achievement of sustainable development.

- 2.21 The lower housing requirement has also not been the subject of sustainability appraisal (SA). Whilst the SA re-assesses sites based upon a lower housing requirement it fails to consider the implications of a lower housing requirement, compared to the current standard method, upon the delivery of the SA objectives. Even if the lower requirement were justified by national policy, which it is not, the retention of the housing requirement at the level previously consulted upon would be a reasonable alternative.
- 2.22 The Council published an Affordable Housing Strategy in 2019. On page 14 of the Affordable Housing Strategy, it is suggested that there is a need for 3,500 affordable homes to 2036, or circa 220 per annum. This is based on the existing need for 3,000 affordable homes and an allowance of 500 homes to provide for new households and those falling into need. Given that an average of only 76 affordable homes have been built per annum in Fareham Borough since 2011, there is a significant need to boost the supply of additional affordable housing to address needs. Indeed, the delivery of affordable housing needs to almost treble. The provision of affordable housing to address this need is a significant matter.
- 2.23 It is also unclear whether the PLP has planned to adequately accommodate unmet need from other authorities. The PPG (ID 2a-010-20190220) identifies that meeting unmet needs from neighbouring authorities as set out in a Statement of Common Ground is one reason why local housing need calculated using the current standard should be exceeded. Contrary to the advice within the PPG (ID 2a-010-20190220) there are currently no Statements of Common Ground identifying if the figure of 847 dwellings is adequate or accepted by other authorities. Rather the Council speculates that this contribution would be "ratified" by a subsequent Partnership for South Hampshire Statement of Common Ground (Duty to Co-operate Statement of Compliance, paragraph 4.5). There is, however, no evidence to support this speculation. Indeed, the only evidence presented confirms a request for Fareham

to accommodate 1,000 dwellings from a single neighbouring authority. The PLP has been prepared in advance of the publication of Statements of Common Ground – as such it's preparation is premature.

2.24 At paragraph 4.4 of the PLP it is stated that unmet need in the sub-region over the plan period could be "circa 10,750 dwellings". At paragraph 4.5, Fareham's "immediate neighbours" are considered, and it is confirmed that Portsmouth City Council has requested that Fareham contributes 1,000 dwellings towards its unmet need, and that Gosport is "likely to have an unmet need issue, currently estimated to be in the region of 2,500 dwellings...". The Council's 'Duty to Co-operate Statement of Compliance' identifies at paragraph 4.6 that instead of responding to the request from Portsmouth the Council is proposing to: "...take the approach that the issue of unmet need is not dealt with as specific to any authority, but as a general contribution." It is not clear how this "general contribution" has been calculated but it appears inadequate. Gosport Borough lies between Portsmouth and Fareham. It is clear that Portsmouth cannot accommodate any of Gosport's unmet need so the obvious place to accommodate it is in Fareham Borough, and Fareham East forms part of the Portsmouth Housing Market Area. Therefore, if Fareham plans to deliver the unmet needs of Portsmouth and Gosport, its contribution would be 3,500 homes. However, the PLP (Table 4.1) proposes a contribution of just 847 dwellings to wider unmet need. This figure should be reviewed.

2.25 In relation to unmet need, it should also be remembered that Welborne (previously known as the North of Fareham SDA) was originally conceived by PUSH (now PfSH) as one of two SDAs which were promoted to meet the sub-regional needs of south Hampshire and brought forward in the "South East Plan". The Inspector's Report on the Examination into the Fareham LDF Core Strategy (dated 20th July, 2011) identified five Main Issues, Main Issue 1 being:

"7. The North of Fareham SDA represents the most significant and controversial element of the Core Strategy.While the principle of the SDA's development is contained in the regional strategy – policy SH2 of the South East Plan (SEP) – the justification for the proposal derives from evidence prepared by South Hampshire local authorities (the Partnership for Urban South Hampshire [PUSH]) during the SEP's preparation....The advantages of SDAs are seen as threefold: safeguarding existing towns and villages by reducing coalescence; providing more opportunities

for planning gain; and achieving a critical mass to deliver sustainability benefits. The development now proposed is one of two SDAs proposed by PUSH and brought forward into the SEP. Both are aimed at meeting sub-regional housing needs and, as such, their housing totals are separated from the housing requirement for the remainder of the Boroughs concerned in the sub-regional strategy and SEP." (our underlining)

- 2.26 However, the Council is now treating Welborne as a source of housing supply for Fareham Borough only, disregarding its planned sub-regional role. This compounds the lack of positive preparation of the PLP and starkly contrasts the Council's current approach to the delivery of housing to meet sub-regional needs with its approach of a decade ago.

2. It is not Justified:

- 2.27 The PLP's strategy for housing delivery is not appropriate, because it is based on a need figure derived from the draft revised Standard Methodology which was still the subject of public consultation at the time that the Plan was prepared. The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa). As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa was procedurally flawed, lacking in evidential basis, premature and misleading (as confirmed by the Government's announcement on 16 December 2020 that the Council's annual housing target is to remain at 514 homes per annum).

3. It is not Effective:

- 2.28 The Council has decided to deliberately plan to not meet its local objectively assessed housing need, so fundamentally the plan will not be effective. This, coupled with its apparent failure to plan to contribute appropriately to the unmet housing need of the sub-region, indicates a failure to work effectively with its neighbouring authorities on cross-boundary strategic planning for housing delivery and a failure "to support the Government's objective of significantly boosting the supply of homes" (NPPF, paragraph 59). Rather, the PLP proposes to restrict the supply of homes in the plan period in a way which will exacerbate the local housing crisis.

4. It is not Consistent with National Policy:

The PLP is not consistent with the NPPF because:

- It will not contribute to the achievement of sustainable development by not, as a minimum, planning to meet its local objectively assessed housing need;
- It is not planning to adequately meet the unmet housing needs of neighbouring authorities in the sub-region;
- It has not based its housing proposals on the current Standard Methodology annual housing need figure of 514 hpa;
- Its strategy lacks a robust evidential justification;
- It's proposed housing land supply includes a majority of housing from sites which are not "deliverable" as defined by the NPPF

B3.3 The Publication Local Plan does not Comply with the Duty to Co-operate

- 2.29 As stated at B3.1 above, it is unclear whether the PLP has planned to adequately accommodate unmet need from other authorities.
- 2.30 Against a sub-regional unmet need figure of "circa 10,750 dwellings", and in the context of both neighbouring authorities of Portsmouth City Council and Gosport Borough Council having "unmet need issue(s)", and Havant Borough Council being expressly unable to accommodate any unmet need, the PLP (Table 4.1) proposes a contribution of 847 dwellings to wider unmet need. It is not clear how this has been calculated and it appears inadequate.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

1. Plan to meet, as a minimum, the area's objectively assessed housing need. The current Standard Methodology annual housing need figure is currently 514 hpa.
2. Provide Statements of Common Ground in relation to unmet need from neighbouring and PfSH authorities. Any agreements will need to be

included as additional housing to the minimum 514 hpa.

3. In any event, plan for a level of housing which contributes to the achievement of sustainable development.
4. Treat this plan as an interim plan and reaffirm the Council's commitment to undertake an urgent a review of the Welborne Plan for incorporation into a consolidated early review of this plan.
5. The Council has not undertaken SA of all reasonable alternative housing requirements;
6. The Council has not planned to meet current housing needs, opting instead to phase its housing supply in a way which will exacerbate the current significant under-supply problems;

- 2.31 Consequential to the above, the Council must allocate additional sites for housing in this interim plan (ahead of the urgent review of the Welborne Plan) to meet its confirmed housing target of 514 hpa, including the allocation of Land West of Old Street, Stubbington for about 75 dwellings.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 2.32 The role of plan-making in contributing to the achievement of sustainable development is a legal requirement (Section 39(2) of the Planning and Compulsory Purchase Act 2004).
- 2.33 Revisions to the plan so that it plans, as a minimum, to meet the local objectively assessed need for housing, meet affordable housing need and adequately contribute to meeting unmet need would assist the PLP to meet the Tests of Soundness.

3.0 Specific Proposed Changes

B4c Suggested revised wording of any policy or text:

Policy H1: Housing provision

- 3.1 Completely revise the proposed housing target on the basis of the confirmed Standard Methodology figure for the Borough of a minimum of 514 hpa plus an appropriate contribution to meeting sub-regional unmet needs.
- 3.2 Ensure that the revised housing target includes the delivery of a minimum of 220 affordable homes per annum.
- 3.3 Plan to deliver the revised housing target including a five year supply of deliverable sites. In this regard, Welborne (the supply of housing from which is relied on heavily by the PLP) cannot currently be regarded as "deliverable" as defined in the NPPF.
- 3.4 Consequential updates to paragraphs 4.1 – 4.20 including Tables 4.1, 4.2, 4.3.
- 3.5 Consequential revisions to the list of Housing Allocation Policies under paragraph 4.20 to include allocations sufficient to deliver the revised housing and affordable housing targets, including the allocation of Land West of Old Street, Stubbington for about 75 dwellings.
- 3.6 Policy H1 also seeks to identify a 'phased' requirement. The overall supply is described as at least 8,389 dwellings - this is just 165 dwellings greater than the requirement when the correct local housing need standard method is applied. Given the need to provide for unmet needs from neighbouring authorities this is clearly insufficient and as such further allocations are required.
- 3.7 Policy H1 seeks to 'phase' this supply identifying the following:
 - Approximately 2,250 dwellings (averaging 450 dwellings per annum) between 2021/22 and 2025/2613,
 - Approximately 2,400 dwellings (averaging 480 dwellings per annum) between 2026/27 and 2030/31,

- Approximately 3,750 dwellings (averaging 625 dwellings per annum) between 2031/32 and 2036/2037.

- 3.8 This phasing clearly will not meet the overall plan requirement. The rationale for this phasing is due to an anticipation that many of the housing allocations will begin to deliver later in the plan period. This is simply a factor of the sites chosen rather than an evidence-based approach to need. The net effect is that in the early part of the plan period the full need will not be met, exacerbating the current significant housing land supply shortfall in the Borough. This will mean households will either be unable to form or will be forced to move elsewhere to find appropriate accommodation. This not only has an impact upon affordability through increased demand but also has implications for social mobility and health for young and old alike.
- 3.9 The lack of housing to meet needs in the short-term is exacerbated by recent under-delivery of both market and affordable housing. The Council recognises it has under-delivered in recent years due to the reference to the need for a 20% buffer in accordance with NPPF, paragraph 73 (paragraph 4.16, PLP).
- 3.10 The housing requirement in the PLP should not be phased to manufacture a five-year housing land supply in the short-term. The plan should seek to address housing need now - to do otherwise is not justified or effective.
- 3.11 The second part of Policy H1 identifies the sources of supply. Whilst our clients do not wish to comment upon individual sites, we do have significant concerns that the sources of supply will not deliver the plan period housing requirement in full. The PLP, paragraph 4.16, acknowledges that many of the chosen sites will not deliver until later in the plan period therefore any slippage in timescale could well push delivery beyond the plan period. Furthermore, the Council is heavily reliant upon delivery at Welborne. Within our comments upon the Plan overall we identify the need for delivery from this site to be reviewed and indeed question whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10.
- 3.12 Furthermore, the Council cannot currently demonstrate a five-year housing land supply. The Council's most recent assessment of its five-year housing land supply suggests a 4.03-year supply. This assessment appears optimistic given recent

appeal decisions which identify it is closer 2.4 years. Given these shortcomings it is essential that the PLP seeks to address this under-supply in the short-term.

Development Strategy

- 3.13 This section is substantially focussed on restricting development outside the existing settlement policy boundaries of urban areas. This marks a significant change in approach since the Regulation 18 version of this plan when the emphasis was on a strategy for locating development sustainably. This is in conflict with the NPPF, paragraph 11, which advises that "Plans and decisions should apply a presumption in favour of sustainable development" and that "For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change".

- 3.14 The highly restrictive strategic policy approach introduced into the PLP does not accord with this national guidance.

Policy DS1: Development in the Countryside

- 3.15 For housing development which is brought forward in the absence of a 5 year housing land supply, Policy HP4 applies. This will necessarily introduce new built form onto greenfield sites adjacent or well related to existing urban area boundaries. This will inevitably cause a change to the landscape character of the site and immediately adjacent land. Criteria ii) and iii) require proposals to "conserve and enhance landscapes" and "recognise the intrinsic character and beauty of the countryside". It is not clear which "landscapes" are being referred to – the spatial extent of 'landscapes' should be defined here to avoid ambiguity. While the landscape as a whole could be enhanced by carefully designed development proposals, the principle of landscape change within the site itself should be established. If this requirement to 'conserve and enhance landscapes' is applied to the landscape features and character of a potential development site, then this requirement is excessive and unachievable once the landscape 'change' from an undeveloped site to a developed site is taken into account. Either the spatial extent of 'landscapes' should be defined or the requirement to 'enhance landscapes' be removed from the policy.

- 3.16 Moreover, it is not clear how the extent to which a proposal has recognised "the intrinsic character of the beauty of the countryside" can be measured. After all, those attributes can be "recognised" but then disregarded. It is true that every area of countryside has a "character" but not that every area of countryside has "beauty".
- 3.17 Criterion v) should include an exception for development which is brought forward under Policy HP4, where the application of the "tilted balance" would allow the loss of BMVAL.
- 3.18 Paragraph 3.39 fails to explain how this policy works in relation to housing policies.

Policy DS2: Development in Strategic Gaps

- 3.19 Under the heading 'Why we need this policy', Paragraph 3.43 of the Publication Local Plan states that "Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, defining settlement character and providing green infrastructure opportunities". The introduction of 'settlement character' into the policy wording is not consistent with the evidence base which confirms at paragraph 2 in Chapter 4 of the Technical Review of Areas of Special Landscape Quality and Strategic Gaps that the "primary purpose of identifying Strategic Gaps is to prevent the coalescence of separate settlements and help maintain distinct community identities. Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities".
- 3.20 Strategic Policy DS2: Development in Strategic Gaps should only apply to land which provides a spatial function to maintain separation of settlements and define settlement pattern rather than defining settlement character. Land west of Old Street, Stubbington does not contribute to the spatial separation of settlements, therefore Strategic Policy DS2 should not be applied to this land.
- 3.21 This view is supported by the Inspector for the appeal relating to Land west of Old Street, Stubbington APP/A1720/W/18/3200409 who stated that:

"The Meon Gap lies between Fareham/ Stubbington and the Western Wards/Whiteley. Policy CS22 requires the integrity of the gap to be maintained and the physical and visual separation of settlements to be respected. In terms of separation of settlements there is no dispute that there would be no diminution either in physical or visual terms if the development were to go ahead. The policy indicates that the gap boundaries will be reviewed to ensure that no more land than necessary is included in order to maintain gap function". (our underlining)

3.22 The Inspector goes on to state:

"It should be remembered that gap policy is a spatial tool. The Council referred to the role of the gap in maintaining the character or setting of Stubbington. This is considered in the 2017 LCA where the strategic gap designation is reviewed. However, the document makes clear that its purpose is to consider what role the landscape plays within the strategic gaps. It is not intended to examine the designation criteria, or the broad areas identified. This is important to note because it is landscape rather than spatial considerations that are key to settlement character and setting. The character and setting of Stubbington is not pertinent to gap designation or function in policy CS22".

3.23 The Inspector concluded:

"I appreciate that a review of gap boundaries was undertaken in 2012 and that no changes were recommended in relation to the land immediately adjacent to Stubbington. However, for the reasons I have given I do not consider that the proposed development of the appeal site would adversely affect the integrity of the Meon Gap". (our underlining)

3.24 For this reason, Strategic Policy DS2 should not apply to Land west of Old Street, Stubbington, because it has been confirmed that this land does not contribute to the function of the Strategic Gap. The Meon Valley is protected by many environmental designations which prevent development into this area from the Fareham side of the valley. The designated valley floor of the Meon Valley maintains separation of settlements to an extent that an adequate gap is maintained without the inclusion of Land west of Old Street, Stubbington within the Strategic Gap. Fareham Policy CS: 22: Strategic Gaps, states that "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 their physical and visual separation.” It is therefore unnecessary for Strategic Policy DS2 to apply Land west of Old Street, Stubbington.

- 3.25 At paragraph 7 of Chapter 4 of the Technical Review of Areas of Special Landscape Quality and Strategic Gaps states that “Where it is considered that there is capacity to absorb more development within the Fareham-Stubbington Strategic Gap, GI mitigation will be required, to a greater or lesser extent depending on the scale and nature of any development”. Again, at paragraph 11 of the chapter 4 summary the Technical Review states “The ability to absorb development into the landscape exists, without compromising the integrity of the Gap function, again on the understanding that the settlement edges must include appropriate Green Infrastructure”.
- 3.26 We submit that there is similar potential within the Meon Gap where the Gap is significantly wider than is the case for the Fareham-Stubbington Strategic Gap. This is particularly the case for Land west of Old Street, Stubbington where advance planting and green infrastructure has already been implemented during 2019 and is establishing well. This will continue to develop and establish a wooded edge to the Meon Valley, providing separation between the Meon Valley and Land west of Old Street, Stubbington. This would reinforce the wooded edge characteristics of settlements which are a feature throughout Fareham Borough, as referred to within the Fareham Borough Gap Review 2012, which states “The edges of new housing are often more visible than older housing stock as a result of garden tree planting, which has helped to screen the older properties adjoining the gap. Properties which back onto woodland have the most robust edge to the gap”. In the case of Land west of Old Street, Stubbington the advance planting will create a wooded edge, providing a strong boundary between the site and the Meon Valley (stronger than is the case for the older housing at Hill Head where rear garden boundaries are visible from the Meon Valley) and in so doing it would be more consistent with the character of the settlement edges of the Borough. These green infrastructure enhancements already implemented will bring benefits to the biodiversity of the Meon Valley through enhanced planting and management of the existing farmland.

Policy DS3: Landscape

- 3.27 This draft policy designates about a quarter of the land area of the Borough as "Areas of Special Landscape Quality" (as shown on Figure 3.3).
- 3.28 From the commentary provided in paragraph 3.49, it appears that the Council is equating its 'Areas of Special Landscape Quality' (ASLQ) with 'valued landscapes'. This is questionable. All landscapes are valued at some level by different people. NPPF paragraph 170 triggers a need to consider when landscape value is just a local consideration, or when landscapes are more 'out of the ordinary'. Fundamentally, for a landscape to be a valued landscape, it does not have to be designated - so by designating the ASLQ (or by creating a valued landscape designation) the Council has created a policy that is irrelevant, because guidance says that non designated landscapes can be valued, so site-by-site assessments will be required in any event. **Given that Policy DS3 is irrelevant, it is unnecessary and it should be deleted.**
- 3.29 However, if it is held that Policy DS3 should not be deleted, the following comments apply:
- 3.30 Paragraph 3.55 states that "...all parts of the Borough have some landscape quality and may be sensitive to landscape change". This is ambiguous. All landscape will be of 'a quality' but quality (in GLVIA3 aligned with condition) is only one consideration of landscape sensitivity.
- 3.31 With regard to "How the policy works", paragraph 3.56 states that "*The criteria within the policy (points a-g) are derived from the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) published by the Landscape Institute.*". The GLVIA is an extensive and diverse document and, if it is to be used as basis for this policy then a specific reference or explanation should be provided as to how points a-g have been derived.
- 3.32 Paragraph 3.57 refers to the submission of "...a proportionate Landscape Assessment". In the event that Policy DS3 is not deleted, this should be amended to require the submission of a 'Landscape and Visual Impact Assessment'. There are many applications of Landscape Assessment and several forms of reporting. Reference to LVIA would be specific and clear as to what is required (and incidentally relates better to the approaches set out in GLVIA3).

- 3.33 The local plan evidence at page 50 of the Technical Review of Areas of Special Landscape Quality and Strategic Gaps does not include the requirement for the landscape to be "protected and enhanced". The requirement to "protect and enhance" the landscape is ambiguous because it is not clear whether it is intended to refer to the landscape of the ASLQ as a whole or if it would apply to a potential development site, within which the requirement to enhance is excessive and unachievable once the landscape 'change' from an undeveloped site to a developed site is taken into account. As an example, a development could provide enhancement to the ASLQ landscape through restoration of landscape features or new green infrastructure, but at a site scale the landscape 'change' from an undeveloped site to a developed site is unlikely to result in 'enhancement'.
- 3.34 Each of the Candidate Areas of Special Landscape Quality have been assessed against the GLVIA3 Box 5.1 criteria, which is an accepted tool to assess landscape value. Land west of Old Street, Stubbington is located within ASLQ 4: Meon Valley and in LLCA 6.1c which is described as within the Landscape Assessment (2017) as:
- "On the eastern side of the valley floor, area 6.1c is occupied by similar land uses but with greater variation in field pattern and enclosure. The area comprises a mosaic of smaller-scale pastures bounded by strong hedgerows and trees (particularly within the northern and southern ends of the area), two small-scale enclosed tributary valleys and some larger fields with a more open, denuded character within the central section around the Crofton Manor Equestrian Centre. Together with the adjacent horticultural glasshouses and other commercial operations, this lends a localised fringe character to the landscape but does not detract significantly from the essentially rural characteristics of the overall area".*
- 3.35 At Figure 3.3 each of the LCA within Fareham is assessed against the GLVIA3 'valued landscape' criteria. Figure 1.3 explains the criteria in more detail, defining a 'High match', 'Good match', 'Fair match' and 'Partial match'.
- 3.36 Land west of Old Street, Stubbington is located within LLCA 6.1c which is assessed as a 'good match' for all criteria, except 'Associations' which is a 'partial match'. Figure 3.2 defines a 'Good match' as *"The area's scenic quality and condition are both relatively high. It has a generally unspoilt, intact and coherent character with a good level of topographic and visual unity. It has several*

features of note, including natural and cultural designations, and is valued for its recreational opportunities. There are some detracting influences, but these do not generally intrude”.

- 3.37 We submit that the assessment of LLCA 6.1c has attributed a higher value for the ‘Recreational value’ criteria than can be justified. The southern half of LLCA 6.1c does not have any means of public access so can not be described as being ‘valued for its recreational opportunities’. In the northern half there are infrequent public footpaths and the Crofton Manor Equestrian Centre, neither of which justify the area being defined as ‘valued for its recreational opportunities’. Instead, the term ‘Recreational value is relatively limited’ is a fair reflection of the recreation provision within LLCA 6.1c as a whole, which is the definition applicable to a ‘Partial Match’.
- 3.38 Landscape quality (condition) is also assessed as a ‘Good Match’, despite the Landscape Assessment (2017) acknowledging its ‘denuded character’ and ‘fringe character’. This character is a feature of LLCA 6.1c, and for this reason the ‘Good Match’ definition as ‘generally unspoilt, intact and coherent character’ is not justifiable. A ‘Fair Match’ is most applicable to LLCA 6.1c, defined as “condition is moderate to good. It is generally intact and coherent with some unspoilt characteristics”.
- 3.39 The criteria of ‘Conservation interests’ is also assessed as a ‘Good Match’, defined as “It has a number of features of note, including natural and cultural designations”. We submit that ‘Fair Match’ is a more balanced description of LLCA 6.1c, defined as “some features of note which may include natural or cultural designations”.

Policy HP1: New Residential Development

- 3.40 This policy relates to all new housing proposals. However, it only envisages housing coming forward outside Urban Area boundaries through either the conversion of a non-residential building or as a replacement dwelling. It should also cross-refer to Policy HP4 which allows housing to come forward on land outside Urban Area boundaries if the Council cannot demonstrate a Five Year Housing Land Supply.
- 3.41 Therefore add:

"c) It is for additional housing in circumstances where the Council cannot demonstrate a Five Year Housing Land Supply and Policy HP4 applies."

Policy HP4: Five-Year Housing Land Supply

3.42 The housing requirement set out in Policy H1 must be re-calculated using the current Standard methodology as described in our comments on draft Policy H1 above.

3.43 Paragraph 5.24 infers that Policy HP4 reproduces Local Plan Part 2 Policy DSP40. However, the third criterion in Policy DSP40 was as follows:

"iii) The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;"

3.44 This has been replaced in Policy HP4 by:

"c) The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant, does not significantly affect the integrity of a Strategic Gap;"

3.45 If a five year housing land supply cannot be demonstrated, then in accordance with the NPPF, paragraph 11d, the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply. This policy may therefore be judged to be inappropriate because it adds restrictions which may prevent sustainable sites from coming forward. However, if such a policy is held to be necessary, then a faithful reproduction of Policy DSP40 iii) is strongly preferred. See our comments on Policy DS1 in this regard.

Policy HP5: Provision of Affordable Housing

3.46 This draft policy states that "affordable housing must be provided" (our underlining) in the following proportions:

- i. At least 10% as Social Rent; and

- ii. At least 55% as Affordable Rent or Social Rent; and
- iii. The remainder, but no less than 10% as Affordable Home Ownership.
- iv. The mix of property size and type should reflect the local need and the site characteristics.

3.47 As drafted this policy is not sufficiently flexible. As acknowledged at paragraph 5.36, development viability will be an issue on some sites. As acknowledged at paragraph 5.39, occasionally the tenure mix prescribed by the policy will not be appropriate; and as acknowledged at paragraph 5.34, other exceptional circumstances may arise (such as abnormal costs) which dictate that a non-standard provision of affordable housing is demonstrated to be appropriate.

3.48 Therefore, amend the first part of the policy to read:

"Sites that can accommodate 10 or more dwellings or sites with an area of 0.5 hectares or more shall normally provide: ..."

3.49 And amend the second part of the policy to read:

"The affordable housing shall normally be provided in accordance with the following proportions: ..."

Policy HP7: Adaptable and Accessible Dwellings

3.50 This draft policy states:

"Development proposals for all new dwellings shall provide:

- a) At least 15% of all new dwellings at Category 2 standard; and
- b) On schemes of over 100 dwellings (gross), at least 2% of private housing and 5% of affordable housing shall be provided as wheelchair accessible Category 3 properties."

3.51 Similar to Policy HP5 above, as drafted this policy is not sufficiently flexible. It is acknowledged that this policy is based on the requirements of Part M of the Building Regulations but it must allow for circumstances arising which mean that these requirements cannot be delivered (fully or otherwise).

3.52 Therefore, amend the first line of the policy to read:

"Development proposals for all new dwellings shall normally provide: ..."

3.53 Paragraph 5.57 of the supporting text states:

"The cost to development for providing Category 2 and 3 is relatively minimal. Flexibility for additional costs have been factored into the viability evidence base and this indicates that the requirements for Category 2 and 3 should have no detrimental impact on the viability of schemes in the Borough..."

3.54 **This statement is strongly disputed.** In reality, these costs will not be factored into a developer's viability calculations (particularly in relation to Category 3 requirements) because option agreements / conditional contracts will have already been agreed on the sites that the Council want to see come forward, so these costs will not have been anticipated. The Category 3 requirements must be substantiated by quantified evidence of the level of need for such units in the Borough – in the absence of this it is not clear whether the level of provision sought by this policy is appropriate.

Policy HP9: Self and Custom Build Homes

3.55 This policy requires 10% of dwellings on sites of 40 dwellings or more to be provided for Self and Custom Build Homes. The practical implications of managing self or custom build developments on sites otherwise being constructed by housing developers or housing associations must be carefully considered. There is concern that 40 dwellings is too small a threshold at which to introduce this requirement due to the potentially onerous construction management implications which will arise. It would be preferable for the Council to allocate specific sites for self and custom build developments instead of requiring this element on all housing developments of 40 dwellings or more.

3.56 It is noted that, as stated at paragraph 5.70, only 1% of housing plots at Welborne are required to be provided for self or custom build under the Welborne Plan (2015). The total number of homes to be delivered by Welborne has reduced considerably over the last five years so this level of requirement should be reviewed as it will not yield the number of self or custom build homes as was anticipated at the time the Welborne Plan was prepared. Strategic allocations

such as Welborne provide the ideal opportunity for parcels of land to be allocated for self or custom build, so that opportunity should not be missed. This should be addressed in the review of the Welborne Plan which is overdue and necessary.

Policy D1: High Quality Design and Place Making

- 3.57 This is a highly aspirational policy which sets out ten criteria ("key characteristics of high quality design") against which all development proposals will be judged "to ensure the creation of quality places." It is not clear what a "quality place" is – this should be defined. The ten criteria push the "bar" too high – all proposals cannot be expected to "create places that are attractive, memorable, distinctive and of strong character", for example, laudable though those aspirations are. In practice, very few proposals would receive planning permission if assessed against this requirement.

Appendix B: Housing Trajectory

- 3.58 This appendix must be updated as it does not reflect the quantum of housing required to meet the local needs. It also projects completions of 975 homes in 2023/24 and 961 homes in 2024/5, which are at risk due to the delays to Welborne which continue. Completions from Welborne should be shown separately as previously.

Proposed housing allocation of Land West of Old Street, Stubbington for about 75 dwellings

- 3.59 In 2019 the appeal Inspector concluded that the development of the site would not adversely affect the integrity of the Meon Valley Strategic Gap. Clearly, therefore, the site should be excluded from the Strategic Gap boundary. The boundaries of the strategic gap were defined in relation to Core Strategy Policy CS22 and they were drawn in the context of the understanding of development needs at that time – an understanding which no longer reflects current reality, that being a very substantial shortfall in housing land supply and the preparation of the PLP by the Council which plans to under-provide housing against the Council's annual housing requirement of 514 homes per annum. Strategic Gap boundaries must be reviewed as part of the process of allocating additional sites for housing in this local plan, and our client's site west of Old Street, Stubbington should be removed from the Strategic Gap.

- 3.60 The 2019 appeal Inspector found that the West of Old Street, Stubbington site lay in an area of valued landscape. In this context, the value of the site's landscape has been re-assessed as part of our commentary on Policy DS3 above, against the GLVIA3 'valued landscape' criteria. As described, the site performs no better than as a Fair or Partial match against these criteria. When account is taken of the effect of the structural woodland planting undertaken over time, it is clear that development of the eastern part of the site will only have a minor impact on the wider landscape at most. Lying adjacent to the existing settlement of Stubbington, the introduction of development will appear entirely characteristic within the receiving landscape, while providing a strong, vegetated edge to the countryside in perpetuity. There is no doubt that the character of the developed part of the site would change, but that is no different for any greenfield development. There is no reason to assume that the site's development will be anything other than an attractive extension to Stubbington and one which is entirely congruous with its surroundings. The site's landscape containment has been enhanced through woodland planting which will both screen it from the Meon Valley and enhance its biodiversity.
- 3.61 Moreover, the western part of the site, beyond the woodland planting belt, is being used to provide mitigation habitat for Solent Waders and Brent Geese, offsetting development impact on low use SWBG sites elsewhere in borough. The segregation of this part of the site acknowledges this function and avoids its disturbance.
- 3.62 The West of Old Street site is also sustainably located for access to services and facilities and to sustainable transport modes (walking, cycling and public transport).
- 3.63 For all of these reasons, the Council is encouraged to allocate Land West of Old Street, Stubbington for about 75 dwellings. The site is controlled by a highly reputable local housing developer – Bargate Homes – which has a strong local track record of delivery and is keen to bring it forward for development immediately, such that the site can make an important contribution to the Council's five year housing land supply.

4.0 Participation at the examination hearing session

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session.

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To contribute to testing the legal compliance and soundness of the PLP for the reasons set out in these representations.

Keely, Lauren

From: Consultation
Sent: 18 December 2020 15:29
To: Planning Policy
Subject: Hammond Family, Miller Homes & Bargate Homes (on behalf of Pegasus Group) response
Attachments: Fareham LP 2037 Reps_Hammond Miller Bargate_Dec 2020 Final.pdf; P20-3363 _Newgate Lane South_L&V Reps+FIGS_FINAL_2020-12-18a.pdf; HA2 Ecology Technical Note.pdf; ITB10353-005A - LP Reps Dec 2020 Full R (1).pdf
Importance: High

Katherine Trott
Engagement Officer
Fareham Borough Council
01329824580



From: Jeremy Gardiner [REDACTED]
Sent: 18 December 2020 13:15
To: Consultation <Consultation@fareham.gov.uk>
Subject: Fareham Local Plan 2037 - Publication Local Plan (reg.19): Representations on behalf of the Hammond Family, Miller Homes and Bargate Homes
Importance: High

Dear Sir or Madam,

On behalf of our clients, the Hammond Family, Miller Homes and Bargate Homes, please find attached representations on the Publication Local Plan. The representations relate both to the overall plan and to the former Policy HA2 site, Newgate Lane South, which was omitted from this version of the emerging plan but should be re-instated as a proposed housing allocation for about 500 dwellings.

The attached documents comprise planning representations from Pegasus Group, supported by the following:

- Preliminary Landscape and Visual Appraisal of the Policy HA2 site by Pegasus Group;
- Ecology Technical Note by WYG (part of Tetra Tech), and;
- Transport Delivery Technical Note by i-Transport.

Please confirm receipt of these representations.

Yours faithfully,

Jeremy Gardiner
Senior Director (Planning)

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

3 West Links | Tollgate | Chandlers Ford | Eastleigh | Hampshire | SO53 3TG

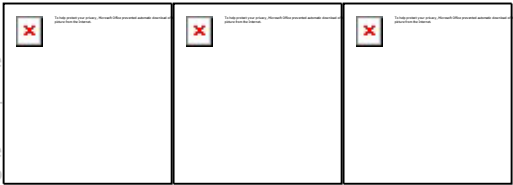
[REDACTED]



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

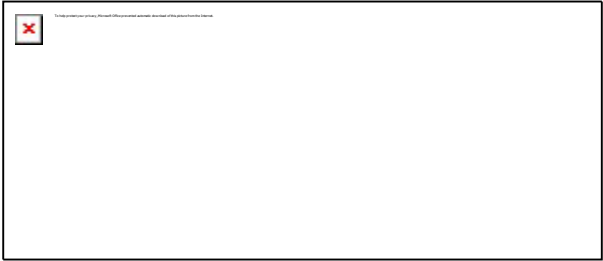
  www.pegasusgroup.co.uk

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.
This email and any associated files, is intended for the exclusive use of the addressee only.
If you are not the intended recipient you should not use the contents nor disclose them to any other person.
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.
*****IMPORTANT INFORMATION REGARDING PEGASUS GROUP & CORONAVIRUS / COVID-19*****

After the extraordinary events of 2020, may we wish you a peaceful Christmas and a Happy New Year.
Our company will take a break over the festive period so Pegasus Group will close from 5.30pm on **Wednesday 23rd December 2020** and reopen at 9am on **Monday 4th January 2021**



FAREHAM LOCAL PLAN 2037 REPRESENTATIONS

FORMER POLICY HA2 HOUSING ALLOCATION - LAND AT NEWGATE LANE SOUTH, FAREHAM

**ON BEHALF OF
THE HAMMOND FAMILY, MILLER HOMES AND BARGATE HOMES**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Jeremy Gardiner & Trevor Moody



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.0 Introduction.....Error! Bookmark not defined.

2.0 Plan Overall 2

3.0 Specific Proposed Changes 11

4.0 Participation at the examination hearing sessions 27

Accompanying Supporting Specialist Representations
(referred to in these representations):

Pegasus Group – Preliminary Landscape and Visual Appraisal

i-Transport – Transport Delivery Technical Note

WYG (part of Tetra Tech) – Ecology Technical Note

1.0 Introduction

- 1.1 The following representations are by Pegasus Group on behalf of our clients The Hammond Family, Miller Homes and Bargate Homes. Our clients have interests in land at Newgate Lane South, Fareham which was previously proposed to be allocated for about 475 dwellings in the Regulation 18 version of this plan. For the reasons set out in these representations, our clients are strongly of the view that this allocation should be reinstated in the local plan.
- 1.2 Our clients are important stakeholders within Fareham and are keen to work with the Council to produce a plan which is legally compliant and meets the tests of soundness set out within the National Planning Policy Framework (NPPF). Currently the plan is neither legally compliant nor sound.
- 1.3 The following representations utilise the same format as the Council's response form. Each area of the Publication Local Plan (PLP) which is deemed to be either not legally compliant or unsound is clearly outlined below. Proposed changes to the plan in relation to policies, supporting text and the proposals map are provided.

	Agent	Client
Title	Mr	The Hammond
First Name	Jeremy	Family, Miller
Last Name	Gardiner	Homes and Bargate
Job Title	Senior Director	Homes c/o Agent
Organisation	Pegasus Group	
Address	3 West Links Tollgate Chandlers Ford Eastleigh Hampshire	
Postcode	SO53 3TG	
Telephone	07929 788776	
Email	jeremy.gardiner@pegasusgroup.co.uk	

2.0 Plan Overall

B1 Which part of the Local Plan is this representation about?

2.1 The following comments relate to the overall Local Plan.

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan:

2.2 Paragraphs 1.5 - 1.6, 1.14, 1.17, 1.37, 2.12, 3.19 - 3.22, 3.43, 3.46, 3.49 - 3.57, 4.1 - 4.20, Appendices B and C.

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan

2.3 Policies H1, HP4, HP5, HP7, DS1, DS2, DS3, E2, E3, NE5, D1.

B1c Which part of the Policies Map

2.4 Former Policy HA2 allocation site Newgate Lane South, Employment allocations Policies E2 and E3.

B2 Do you think the Publication Local Plan is:

Legally compliant - No

Sound - No

Complies with the duty to co-operate - No

2.5 The Fareham Local Plan is not legally compliant and is unsound as it is not consistent with national policy, effective or justified.

B3 Please provide details you have to support your answers above.

B3.1 The Publication Local Plan is not Legally Compliant

2.6 The Publication Local Plan (PLP) has based its housing proposals on the annual housing target derived from the Government's draft Revised Standard Methodology published in August 2020 in its consultation "Planning for the Future". The Government's response to this consultation was published on 16th December 2020.

The Government does not propose to proceed with the changes to assessing local housing need consulted on earlier this year in "Changes to the Current Planning System"; but instead has published a revised approach to the Standard Method, which retains the method in its previous and current form except for London and 19 of the most populated cities and urban centres.

2.7 The key change is to apply a 35% uplift to the Standard Method for Greater London and the 19 most populated cities and urban areas in England – Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke on Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton and Brighton and Hove. The minimum housing requirement for Fareham calculated using the amended standard method therefore remains 514hpa.

2.8 The Government's White Paper, "Changes to the Current Planning System" (published in August 2020 alongside the "Planning for the Future" consultation) provided guidance to local planning authorities which were at or close to the Regulation 19 stage of plan-making at paragraph 43:

2.9 "Transition

43. The Government is aware that any change in the standard method will have an impact for plans that are currently under development, as authorities expend considerable resources in developing new plans. To enable an orderly transition to the revised standard method, and achieve as much short-term supply as possible while setting the right expectations for early stage plan-making, we propose that from the publication date of the revised guidance, authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination. Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate. This is to strike a balance between allowing an appropriate transition period for plans that are nearly through the process, but without causing a significant delay in planning for a higher level of need." (our underlining)

2.10 This transitional arrangement applied to Fareham at the time, such that the previous Standard Method (514hpa) continued to apply for plan-making purposes

in the borough in any event, but the Council chose not to follow this national guidance.

- 2.11 The National Planning Policy Framework (NPPF) states (paragraph 16 a)) that Plans should "be prepared with the objective of contributing to the achievement of sustainable development". Footnote 10 confirms that this is a legal requirement of local planning authorities in exercising their plan-making functions. Meeting the objectives of sustainable development includes "...meeting the needs of the present...". By preparing a Plan based on the Consultation draft Standard Methodology target of 403 dwellings per annum, the local planning authority is failing to meet its local objectively assessed need for housing, thereby failing to plan to deliver sustainable development.
- 2.12 The PPG (ID 2a-003-20190220) is clear that the standard method should be used and any other method should only be used in exceptional circumstances. It further explains that:
- 2.13 *"...Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."* (PPG ID 2a-015-20190220).
- 2.14 As discussed above the extant standard method identifies a requirement of 514hpa. The NPPF (paragraph 60) identifies that the current Standard Method provides a minimum requirement. To depart and provide a figure lower than the current Standard Method requires exceptional circumstances and must be justified by clear and robust evidence. This is absent from the Council's evidence base and as such is an unsound approach.
- 2.15 The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa) – a requirement confirmed by the Government's announcement of 16th December, 2020. As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the Consultation revised Standard Methodology figure of 403 hpa was procedurally flawed, lacking in evidential basis, premature and misleading.

- 2.16 The NPPF (paragraph 33) also states that plans should be reviewed every 5 years and updated as necessary. The Inspector's Report on the Examination into the Fareham Local Plan Part 2 (dated 12th May 2015) included modifications which were all proposed by the Council. Its first Main Modification was "a commitment to an early review of the local plan (ie. LP1, LP2 and LP3)". This included a timetable for the local plan review between 2016 and 2018 which the Council has failed to adhere to, having previously expressed its commitment to the Inspector.
- 2.17 The Local Plan Part 3 is the Welborne Plan which was adopted in 2015. The total quantum of housing to be delivered at Welborne has reduced over the years, and the date for its commencement has repeatedly slipped back. The development is currently running about 5 years late. Recently, serious doubts have been expressed over whether it is deliverable at all given the reported funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10. The development is certainly not currently "deliverable" in NPPF terms. Nonetheless, the PLP relies heavily on the delivery of homes at Welborne as by far the most important source of its housing supply - 4,020 homes (just over 48%) out of a total suggested supply of 8,389 homes are timetabled to be completed at Welborne by 2037, and completions are included in the Council's trajectory for the first five years of the plan. Given the heavy reliance placed on a development which, at best, appears to be at serious risk of continuing to be significantly delayed, the Welborne Plan should be reviewed as a matter of urgency.
- 2.18 Given the importance of the Welborne Plan to housing delivery this is considered an issue of both soundness and legal non-compliance.

B3.2 The Publication Local Plan is not Sound

- 2.19 Paragraphs 1.5 – 1.6 of the PLP set out the "Tests of Soundness" which require that the Plan has been "positively prepared, justified, effective and consistent with national policy". The PLB fails to meet the Tests of Soundness for the following reasons:

1. It has not been "positively prepared":

- 2.20 The Plan does not seek to, as a minimum, meet the area's objectively assessed need. Given that the Core Strategy was adopted on 4th August, 2011, it is significantly out of date such that (as advised by paragraph 73 and footnote 32 of

the NPPF) local housing need should be calculated using the current Standard Methodology. On this basis the local housing need target is 514 homes per annum (hpa) plus the appropriate buffer (5% or 20%). Instead, the PLP plans for 403 hpa, thereby failing to plan for the area's objectively assessed need, and failing to contribute to the achievement of sustainable development.

- 2.21 The lower housing requirement has also not been the subject of sustainability appraisal (SA). Whilst the SA re-assesses sites based upon a lower housing requirement it fails to consider the implications of a lower housing requirement, compared to the current standard method, upon the delivery of the SA objectives. Even if the lower requirement were justified by national policy, which it is not, the retention of the housing requirement at the level previously consulted upon would be a reasonable alternative.
- 2.22 The Council published an Affordable Housing Strategy in 2019. On page 14 of the Affordable Housing Strategy, it is suggested that there is a need for 3,500 affordable homes to 2036, or circa 220 per annum. This is based on the existing need for 3,000 affordable homes and an allowance of 500 homes to provide for new households and those falling into need. Given that an average of only 76 affordable homes have been built per annum in Fareham Borough since 2011, there is a significant need to boost the supply of additional affordable housing to address needs. Indeed, the delivery of affordable housing needs to almost treble. The provision of affordable housing to address this need is a significant matter.
- 2.23 It is also unclear whether the PLP has planned to adequately accommodate unmet need from other authorities. The PPG (ID 2a-010-20190220) identifies that meeting unmet needs from neighbouring authorities as set out in a Statement of Common Ground is one reason why local housing need calculated using the current standard should be exceeded. Contrary to the advice within the PPG (ID 2a-010-20190220) there are currently no Statements of Common Ground identifying if the figure of 847 dwellings is adequate or accepted by other authorities. Rather the Council speculates that this contribution would be "ratified" by a subsequent Partnership for South Hampshire Statement of Common Ground (Duty to Co-operate Statement of Compliance, paragraph 4.5). There is, however, no evidence to support this speculation. Indeed, the only evidence presented confirms a request for Fareham to accommodate 1,000 dwellings from a single neighbouring authority. The PLP has been prepared in advance of the publication of Statements of Common Ground –

as such it's preparation is premature.

- 2.24 At paragraph 4.4 of the PLP it is stated that unmet need in the sub-region over the plan period could be "circa 10,750 dwellings". At paragraph 4.5, Fareham's "immediate neighbours" are considered, and it is confirmed that Portsmouth City Council has requested that Fareham contributes 1,000 dwellings towards its unmet need, and that Gosport is "likely to have an unmet need issue, currently estimated to be in the region of 2,500 dwellings...". The Council's 'Duty to Co-operate Statement of Compliance' identifies at paragraph 4.6 that instead of responding to the request from Portsmouth the Council is proposing to: "...take the approach that the issue of unmet need is not dealt with as specific to any authority, but as a general contribution." It is not clear how this "general contribution" has been calculated but it appears inadequate. Gosport Borough lies between Portsmouth and Fareham. It is clear that Portsmouth cannot accommodate any of Gosport's unmet need so the obvious place to accommodate it is in Fareham Borough, and Fareham East forms part of the Portsmouth Housing Market Area. Therefore, if Fareham plans to deliver the unmet needs of Portsmouth and Gosport, its contribution would be 3,500 homes. However, the PLP (Table 4.1) proposes a contribution of just 847 dwellings to wider unmet need. This figure should be reviewed.
- 2.25 In relation to unmet need, it should also be remembered that Welborne (previously known as the North of Fareham SDA) was originally conceived by PUSH (now PFSH) as one of two SDAs which were promoted to meet the sub-regional needs of south Hampshire and brought forward in the "South East Plan". The Inspector's Report on the Examination into the Fareham LDF Core Strategy (dated 20th July, 2011) identified five Main Issues, Main Issue 1 being:

"7. The North of Fareham SDA represents the most significant and controversial element of the Core Strategy.While the principle of the SDA's development is contained in the regional strategy – policy SH2 of the South East Plan (SEP) – the justification for the proposal derives from evidence prepared by South Hampshire local authorities (the Partnership for Urban South Hampshire [PUSH]) during the SEP's preparation....The advantages of SDAs are seen as threefold: safeguarding existing towns and villages by reducing coalescence; providing more opportunities for planning gain; and achieving a critical mass to deliver sustainability benefits.

The development now proposed is one of two SDAs proposed by PUSH and brought forward into the SEP. Both are aimed at meeting sub-regional housing needs and, as such, their housing totals are separated from the housing requirement for the remainder of the Boroughs concerned in the sub-regional strategy and SEP." (our underlining)

- 2.26 However, the Council is now treating Welborne as a source of housing supply for Fareham Borough only, disregarding its planned sub-regional role. This compounds the lack of positive preparation of the PLP and starkly contrasts the Council's current approach to the delivery of housing to meet sub-regional needs with its approach of a decade ago.

2. It is not Justified:

- 2.27 The PLP's strategy for housing delivery is not appropriate, because it is based on a need figure derived from the draft revised Standard Methodology which was still the subject of public consultation at the time that the Plan was prepared. The Government's response to the consultation is awaited. The Government's guidance is that transitional arrangements require Regulation 19 plans to be based on the current Standard Methodology figure (in Fareham's case, 514 hpa). As such, Fareham's decision to progress to Regulation 19 stage with a strategy based on the draft revised Standard Methodology figure of 403 hpa is procedurally flawed, lacking in evidential basis, premature and potentially misleading.

3. It is not Effective:

- 2.28 Fareham has decided to deliberately plan to not meet its local objectively assessed housing need, so fundamentally the plan will not be effective. This, coupled with its apparent failure to plan to contribute appropriately to the unmet housing need of the sub-region, indicates a failure to work effectively with its neighbouring authorities on cross-boundary strategic planning for housing delivery and a failure "to support the Government's objective of significantly boosting the supply of homes" (NPPF, paragraph 59). Rather, the PLP proposes to restrict the supply of homes in the plan period in a way which will exacerbate the local housing crisis.

4. It is not Consistent with National Policy:

- 2.29 The PLP is not consistent with the NPPF because:

- It will not contribute to the achievement of sustainable development by not, as a minimum, planning to meet its local objectively assessed housing need;
- It is not planning to adequately meet the unmet housing needs of neighbouring authorities in the sub-region;
- It has not based its housing proposals on the current Standard Methodology annual housing need figure of 514 hpa;
- Its strategy lacks a robust evidential justification;
- It's proposed housing land supply includes a majority of housing from sites which are not "deliverable" as defined by the NPPF

B3.3 The Publication Local Plan does not Comply with the Duty to Co-operate

- 2.30 As stated at B3.1 above, it is unclear whether the PLP has planned to adequately accommodate unmet need from other authorities.
- 2.31 Against a sub-regional unmet need figure of "circa 10,750 dwellings", and in the context of both neighbouring authorities of Portsmouth City Council and Gosport Borough Council having "unmet need issue(s)", and Havant Borough Council being expressly unable to accommodate any unmet need, the PLP (Table 4.1) proposes a contribution of 847 dwellings to wider unmet need. It is not clear how this has been calculated and it appears inadequate.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

1. Plan to meet, as a minimum, the area's objectively assessed housing need. The current Standard Methodology annual housing need figure is currently 514 hpa.
2. Provide Statements of Common Ground in relation to unmet need from neighbouring and PfSH authorities. Any agreements will need to be included as additional housing to the minimum 514hpa.
3. In any event, plan for a level of housing which contributes to the

achievement of sustainable development.

4. Treat this plan as an interim plan and reaffirm the Council's commitment to undertake an urgent a review of the Welborne Plan for incorporation into a consolidated early review of this plan.
 5. The Council has not undertaken SA of all reasonable alternative housing requirements;
 6. The Council has not planned to meet current housing needs, opting instead to phase its housing supply in a way which will exacerbate the current significant under-supply problems;
- 2.32 Consequential to the above, the Council must allocate additional sites for housing in this interim plan (ahead of the urgent review of the Welborne Plan) to meet its confirmed housing target of 514 hpa, including reinstating the allocation of the former Policy HA2 site, Newgate Lane South.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

- 2.33 The role of plan-making in contributing to the achievement of sustainable development is a legal requirement (Section 39(2) of the Planning and Compulsory Purchase Act 2004).
- 2.34 Revisions to the plan so that it plans, as a minimum, to meet the local objectively assessed need for housing, meet affordable housing need and adequately contribute to meeting unmet need would assist the PLP to meet the Tests of Soundness.

3.0 Specific Proposed Changes

B4c Suggested revised wording of any policy or text:

Policy H1: Housing provision

- 3.1 Completely revise the proposed housing target on the basis of the confirmed Standard Methodology figure for the Borough of a minimum of 514 hpa plus an appropriate contribution to meeting sub-regional unmet needs.
- 3.2 Ensure that the revised housing target includes the delivery of a minimum of 220 affordable homes per annum.
- 3.3 Plan to deliver the revised housing target including a five year supply of deliverable sites. In this regard, Welborne (the supply of housing from which is relied on heavily by the PLP) cannot currently be regarded as "deliverable" as defined in the NPPF.
- 3.4 Consequential updates to paragraphs 4.1 – 4.20 including Tables 4.1, 4.2, 4.3.
- 3.5 Consequential revisions to the list of Housing Allocation Policies under paragraph 4.20 to include allocations sufficient to deliver the revised housing and affordable housing targets, including the re-instatement of HA2 Newgate Lane South for about 500 dwellings.
- 3.6 Policy H1 also seeks to identify a 'phased' requirement. The overall supply is described as at least 8,389 dwellings - this is just 165 dwellings greater than the requirement when the correct local housing need standard method is applied. Given the need to provide for unmet needs from neighbouring authorities this is clearly insufficient and as such further allocations are required.
- 3.7 Policy H1 seeks to 'phase' this supply identifying the following:
 - Approximately 2,250 dwellings (averaging 450 dwellings per annum) between 2021/22 and 2025/2613,
 - Approximately 2,400 dwellings (averaging 480 dwellings per annum) between 2026/27 and 2030/31,

- Approximately 3,750 dwellings (averaging 625 dwellings per annum) between 2031/32 and 2036/2037.

- 3.8 This phasing clearly will not meet the overall plan requirement. The rationale for this phasing is due to an anticipation that many of the housing allocations will begin to deliver later in the plan period. This is simply a factor of the sites chosen rather than an evidence-based approach to need. The net effect is that in the early part of the plan period the full need will not be met, exacerbating the current significant housing land supply shortfall in the Borough. This will mean households will either be unable to form or will be forced to move elsewhere to find appropriate accommodation. This not only has an impact upon affordability through increased demand but also has implications for social mobility and health for young and old alike.
- 3.9 The lack of housing to meet needs in the short-term is exacerbated by recent under-delivery of both market and affordable housing. The Council recognises it has under-delivered in recent years due to the reference to the need for a 20% buffer in accordance with NPPF, paragraph 73 (paragraph 4.16, PLP).
- 3.10 The housing requirement in the PLP should not be phased to manufacture a five-year housing land supply in the short-term. The plan should seek to address housing need now - to do otherwise is not justified or effective.
- 3.11 The second part of Policy H1 identifies the sources of supply. Whilst our clients do not wish to comment upon individual sites, we do have significant concerns that the sources of supply will not deliver the plan period housing requirement in full. The PLP, paragraph 4.16, acknowledges that many of the chosen sites will not deliver until later in the plan period therefore any slippage in timescale could well push delivery beyond the plan period. Furthermore, the Council is heavily reliant upon delivery at Welborne. Within our comments upon the Plan overall we identify the need for delivery from this site to be reviewed and indeed question whether it is deliverable at all given the funding gap of tens of millions of pounds that exists in relation to the required upgrade of M27 junction 10.
- 3.12 Furthermore, the Council cannot currently demonstrate a five-year housing land supply. The Council's most recent assessment of its five-year housing land supply suggests a 4.03-year supply. This assessment appears optimistic given recent

appeal decisions which identify it is closer 2.4 years. Given these shortcomings it is essential that the PLP seeks to address this under-supply in the short-term.

Development Strategy

- 3.13 This section is substantially focussed on restricting development outside the existing settlement policy boundaries of urban areas. This marks a significant change in approach since the Regulation 18 version of this plan when the emphasis was on a strategy for locating development sustainably. This is in conflict with the NPPF, paragraph 11, which advises that "Plans and decisions should apply a presumption in favour of sustainable development" and that "For plan-making this means that:
- a) plans should positively seek opportunities to meet the development needs of their areas, and be sufficiently flexible to adapt to rapid change".
- 3.14 The highly restrictive strategic policy approach introduced into the PLP does not accord with this national guidance.

Policy DS1: Development in the Countryside

- 3.15 For housing development which is brought forward in the absence of a 5 year housing land supply, Policy HP4 applies. This will necessarily introduce new built form onto greenfield sites adjacent or well related to existing urban area boundaries. This will inevitably cause a change to the landscape character of the site and immediately adjacent land. Criteria ii) and iii) require proposals to "conserve and enhance landscapes" and "recognise the intrinsic character and beauty of the countryside". It is not clear which "landscapes" are being referred to – presumably this should be restricted to formally designated landscapes or defined "valued" landscapes because otherwise it could be applied to every area of countryside. It is also not clear how, for example, a housing development can "conserve and enhance" a landscape – relevant measures should be defined. Moreover, it is not clear how the extent to which a proposal has recognised "the intrinsic character of the beauty of the countryside" can be measured. After all, those attributes can be "recognised" but then disregarded. It is true that every area of countryside has a "character" but not that every area of countryside has "beauty".

- 3.16 Criterion v) should include an exception for development which is brought forward under Policy HP4, where the application of the "tilted balance" would allow the loss of BMVAL.
- 3.17 Paragraph 3.39 fails to explain how this policy works in relation to housing policies.

Policy DS2: Development in Strategic Gaps

- 3.18 Strategic Gap 2 "Fareham / Bridgemarky and Stubbington / Lee-on-the-Solent" should be redefined to exclude all land to the east of Newgate Lane, between Newgate Lane and the urban settlement boundary of Bridgemarky.
- 3.19 Paragraph 3.46 states:
- "Further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemarky along with maintaining the separate identity of Peel Common." (our underlining)*
- 3.20 Peel Common is not an urban settlement with a separate identity which merits protection. It has resulted from an evolution of wayside development into ribbon development and even now is, in landscape terms, non-descript as a settlement. The purpose of the gap should be to maintain the separation of Stubbington from Fareham and Lee-on-the-Solent; and the separation of Lee-on-the-Solent from Rowner.
- 3.21 Paragraph 3.43 refers to "The need to respect settlement boundaries and protect the identity of our key settlements". Peel Common is not a key settlement and it does not have a settlement boundary. The deletion of housing allocation Policy HA2 Newgate Lane South from this version of the local plan has been accompanied by the extension of the Strategic Gap designation across the HA2 site to the settlement boundary of Bridgemarky on the Proposals Map. It is suspected that the reference to Peel Common having a "separate identity" in the supporting text has been inserted to attempt to justify the extension of the gap designation over land which has previously been assessed as being suitable for development.

3.22 Paragraph 3.46 states that *"Although no boundary changes are proposed at this time, evidence has shown (that the) boundary of this strategic gap could be redrawn whilst retaining its important function of preventing settlement coalescence."* This is a key failure of the process at this stage. The Council has a quite recent landscape character assessment as part of the evidence base (2017) and a very recent gap study. There are also two strategic road schemes (one complete, one in construction) that affect the landscape character of this gap. This is surely the time for the Council to redraw the boundaries of this strategic gap and strategically plan for growth.

3.23 In this regard, these representations are accompanied by a Preliminary Landscape and Visual Appraisal prepared by Pegasus Group of the former Policy HA2 site, Newgate Lane South. The Summary and Conclusions of this Appraisal include the following:

"7.7. In summary the site sits within a variable pocket of landscape. In isolation the site comprises remnant agricultural enclosures however it cannot be separated from the extensive urbanising influences which surround and frame it, particularly in the context of the more recent severance of the agricultural land that has arisen from the route of the bypass (Newgate Lane East East)....

7.16. In terms of the Fareham and Stubbington strategic gap, the site (along with its local landscape context), is well placed to accommodate some form of development without undue consequences or impacts on the role and function of the Strategic Gap as a whole. This is on the basis that:

- *A substantial distance will be retained across the wider gap, between the site and Stubbington;*
- *In terms of visibility, the site is physically and visually well contained, placed as the area is within a strong framework of green infrastructure and the settlement edge – furthermore, the site (and potential development) will not be visible across the gap from Stubbington;*
- *The surrounding context and urbanising influences, including the residential areas of Peel Common, Bridgemary and Woodcot which reduce the degree of change as they provide a relevant settlement edge context;*

- *The opportunity to contribute to, and maintain, a strong green infrastructure network and facilitate a strategic green infrastructure connection through the area that will reinforce and connect the linear routes which cross broadly north to south through this area; and*
- *In connection with the green infrastructure provision, the ability to incorporate substantial mitigation that will successfully avoid or minimise landscape and visual effects.*

3.24 These conclusions are consistent with the evidence base in relation to the Strategic Gap which acknowledges that the gap designation does not relate to landscape quality, value or condition; that development can be accommodated within gaps without undermining their function; and that urban influences can detract from the functioning of the gap, to the extent that they present a clear justification for amending the boundaries of the gap. The study concludes that the part of the gap between Peel Common and Bridgemary is weak and under development pressure, particularly with the recently constructed Newgate Lane East now forming such a strong urbanising feature in the local landscape context. The Policy HA2 site is not considered to form part of a priority area which is required to maintain the integrity and function of the Fareham / Stubbington Strategic Gap and it is concluded that the site is well placed to accommodate development that could come forward as a well-connected urban extension without significantly affecting the integrity of the gap and the physical and visual separation of settlements. Indeed, this was the Council's previous conclusion when it proposed to allocate the Policy HA2 site. Its December 2019 SHELAA included commentary on the three land parcels (SHELAA sites 3002, 3028 and 3057) which together make up the Policy HA2 site. The Suitability Comment for sites 3002 and 3028 (the smaller northern and southern parcels) were:

"The site is considered suitable for development as part of the proposed housing allocation. Development could be accommodated without significant effects on the landscape character of the wider area."

3.25 For site 3057 (the larger central parcel) the Suitability Comment was:

"Development could be accommodated without significant effects on the landscape character of the wider area (following construction of Newgate Lane South) or the integrity of the Strategic Gap..."

- 3.26 All three component parcels of the HA2 site were described as Suitable, Available and Achievable. Nothing has changed in this regard.

Policy DS3: Landscape

- 3.27 This draft policy designates about a quarter of the land area of the Borough as "Areas of Special Landscape Quality" (as shown on Figure 3.3).
- 3.28 From the commentary provided in paragraph 3.49, it appears that the Council is equating its 'Areas of Special Landscape Quality' (ASLQ) with 'valued landscapes'. This is questionable. All landscapes are valued at some level by different people. NPPF paragraph 170 triggers a need to consider when landscape value is just a local consideration, or when landscapes are more 'out of the ordinary'. Fundamentally, for a landscape to be a valued landscape, it does not have to be designated - so by designating the ASLQ (or by creating a valued landscape designation) the Council is at risk of creating a policy that is irrelevant, because guidance says that non designated landscapes can be valued, so site-by-site assessments will be required in any event.
- 3.29 Paragraph 3.55 states that "...all parts of the Borough have some landscape quality and may be sensitive to landscape change". This is ambiguous. All landscape will be of 'a quality' but quality (in GLVIA3 aligned with condition) is only one consideration of landscape sensitivity.
- 3.30 With regard to "How the policy works", paragraph 3.56 states that "*The criteria within the policy (points a-g) are derived from the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) published by the Landscape Institute.*". The GLVIA is an extensive and diverse document and, if it is to be used as basis for this policy then a specific reference or explanation should be provided as to how points a-g have been derived.
- 3.31 Paragraph 3.57 refers to the submission of "...a proportionate Landscape Assessment". This should be amended to require the submission of a 'Landscape and Visual Impact Assessment'. There are many applications of LVIA and several forms of reporting. Reference to LVIA would be specific and clear as to what is required (and incidentally relates better to the approaches set out in GLVIA3).

Policy HP1: New Residential Development

3.32 This policy relates to all new housing proposals. However, it only envisages housing coming forward outside Urban Area boundaries through either the conversion of a non-residential building or as a replacement dwelling. It should also cross-refer to Policy HP4 which allows housing to come forward on land outside Urban Area boundaries if the Council cannot demonstrate a Five Year Housing Land Supply.

3.33 Therefore add:

"c) It is for additional housing in circumstances where the Council cannot demonstrate a Five Year Housing Land Supply and Policy HP4 applies."

Policy HP4: Five-Year Housing Land Supply

3.34 The housing requirement set out in Policy H1 must be re-calculated using the current Standard methodology as described in our comments on draft Policy H1 above.

3.35 Paragraph 5.24 infers that Policy HP4 reproduces Local Plan Part 2 Policy DSP40. However, the third criterion in Policy DSP40 was as follows:

"iii) The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;"

3.36 This has been replaced in Policy HP4 by:

"c) The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character and beauty of the countryside and, if relevant, does not significantly affect the integrity of a Strategic Gap;"

3.37 If a five year housing land supply cannot be demonstrated, then in accordance with the NPPF, paragraph 11d, the most relevant policies in the plan would be out of date and the presumption in favour of sustainable development would apply. This policy may therefore be judged to be inappropriate because it adds restrictions which may prevent sustainable sites from coming forward. However,

if such a policy is held to be necessary, then a faithful reproduction of Policy DSP40 iii) is strongly preferred. See our comments on Policy DS1 in this regard.

Policy HP5: Provision of Affordable Housing

3.38 This draft policy states that "affordable housing must be provided" (our underlining) in the following proportions:

- i. At least 10% as Social Rent; and
- ii. At least 55% as Affordable Rent or Social Rent; and
- iii. The remainder, but no less than 10% as Affordable Home Ownership.
- iv. The mix of property size and type should reflect the local need and the site characteristics.

3.39 As drafted this policy is not sufficiently flexible. As acknowledged at paragraph 5.36, development viability will be an issue on some sites. As acknowledged at paragraph 5.39, occasionally the tenure mix prescribed by the policy will not be appropriate; and as acknowledged at paragraph 5.34, other exceptional circumstances may arise (such as abnormal costs) which dictate that a non-standard provision of affordable housing is demonstrated to be appropriate.

3.40 Therefore, amend the first part of the policy to read:

"Sites that can accommodate 10 or more dwellings or sites with an area of 0.5 hectares or more shall normally provide: ..."

3.41 And amend the second part of the policy to read:

"The affordable housing shall normally be provided in accordance with the following proportions: ..."

Policy HP7: Adaptable and Accessible Dwellings

3.42 This draft policy states:

"Development proposals for all new dwellings shall provide:

- a) At least 15% of all new dwellings at Category 2 standard; and

b) On schemes of over 100 dwellings (gross), at least 2% of private housing and 5% of affordable housing shall be provided as wheelchair accessible Category 3 properties."

3.43 Similar to Policy HP5 above, as drafted this policy is not sufficiently flexible. It is acknowledged that this policy is based on the requirements of Part M of the Building Regulations but it must allow for circumstances arising which mean that these requirements cannot be delivered (fully or otherwise).

3.44 Therefore, amend the first line of the policy to read:

"Development proposals for all new dwellings shall normally provide: ..."

3.45 Paragraph 5.57 of the supporting text states:

"The cost to development for providing Category 2 and 3 is relatively minimal. Flexibility for additional costs have been factored into the viability evidence base and this indicates that the requirements for Category 2 and 3 should have no detrimental impact on the viability of schemes in the Borough..."

3.46 This statement is strongly disputed. In reality, these costs will not be factored into a developer's viability calculations (particularly in relation to Category 3 requirements) because option agreements / conditional contracts will have already been agreed on the sites that the Council want to see come forward, so these costs will not have been anticipated. The Category 3 requirements must be substantiated by quantified evidence of the need for such units in the Borough.

Policy HP9: Self and Custom Build Homes

3.47 This policy requires 10% of dwellings on sites of 40 dwellings or more to be provided for Self and Custom Build Homes. The practical implications of managing self or custom build developments on sites otherwise being constructed by housing developers or housing associations must be carefully considered. There is concern that 40 dwellings is too small a threshold at which to introduce this requirement due to the potentially onerous construction management implications which will arise. It would be preferable for the Council to allocate specific sites for self and custom build developments instead of requiring this element on all housing developments of 40 dwellings or more.

- 3.48 It is noted that, as stated at paragraph 5.70, only 1% of housing plots at Welborne are required to be provided for self or custom build under the Welborne Plan (2015). Strategic allocations such as Welborne provide the ideal opportunity for parcels of land to be allocated for self or custom build, so that opportunity should not be missed. This should be addressed in the review of the Welborne Plan which is overdue and necessary.

Policy E2: Faraday Business Park

- 3.49 This draft policy proposes the allocation of land for 65,000 sq. metres of employment development (in addition to the 22,000 sq. metres already consented). The site is designated as a Low Use site for Brent Geese and Waders.

- 3.50 Criterion e) of the policy states:

"e) Proposals shall meet the requirements of Policy NE5 given the site's Low Use status for Solent Waders and Brent Geese..."

- 3.51 The two site-specific reasons for the deletion of housing allocation HA2 Newgate Lane South given in the Fareham SHLAA (in the context of the Council planning for a reduced housing requirement in the PLP) are that the site lies within a Strategic Gap and that the site is designated as a Low Use site for Brent Geese and Waders. Given the proposed allocation at the Faraday Business Park, a site's designation as of Low Use status for Solent Waders and Brent Geese clearly does not prevent a site from being allocated for development.

Policy E3: Swordfish Business Park

- 3.52 This draft policy proposes the allocation of land for 12,100 sq. metres of employment development (in addition to the 28,000 sq. metres already consented). The site is designated as a Low Use site for Brent Geese and Waders.

- 3.53 Criterion f) of the policy states:

"f) Proposals shall meet the requirements of Policy NE5 given the site's Low Use status for Solent Waders and Brent Geese..."

- 3.54 The two site-specific reasons for the deletion of housing allocation HA2 Newgate Lane South given in the Fareham SHLAA (in the context of the Council planning for a reduced housing requirement in the PLP) are that the site lies within a

Strategic Gap and that the site is designated as a Low Use site for Brent Geese and Waders. Given the proposed allocation at the Swordfish Business Park, a site's designation as of Low Use status for Solent Waders and Brent Geese clearly does not prevent a site from being allocated for development.

Policy NE5: Solent Wader and Brent Goose Sites

- 3.55 Accompanying these representations is a WYG Technical Note in relation to Ecology and the former Policy HA2 Newgate Lane South housing allocation. This addresses the two proposed options for mitigating the impact of development of Low Use SWBG sites. Policy NE5 limits mitigation solutions to either on-site provision or a financial contribution towards mitigation on a suitable identified site. However, as reported in the Technical Note, an off-site solution has been proposed as part of outline application P/19/1260/OA Land East of Newgate Lane East (that application site being the southern part of the former HA2 allocation), and that solution has been reviewed by the Council's Ecologist and found to be acceptable. This therefore represents a compliant solution which can be replicated for other developments in similar circumstances. Policy NE5 should be amended to include this additional option.

Policy D1: High Quality Design and Place Making

- 3.56 This is a highly aspirational policy which sets out ten criteria ("key characteristics of high quality design") against which all development proposals will be judged "to ensure the creation of quality places." It is not clear what a "quality place" is – this should be defined. The ten criteria push the "bar" too high – all proposals cannot be expected to "create places that are attractive, memorable, distinctive and of strong character", for example, laudable though those aspirations are. In practice, very few proposals would receive planning permission if assessed against this requirement.

Appendix B: Housing Trajectory

- 3.57 This appendix must be updated as it does not reflect the quantum of housing required to meet the local needs. It also projects completions of 975 homes in 2023/24 and 961 homes in 2024/5, which are at risk due to the delays to Welborne which continue. Completions from Welborne should be shown separately as previously.

Appendix C:

- 3.58 The purpose of the inclusion of the Local Ecological Network Map at Appendix C is not understood. It includes the identification of land as "Network Opportunities". This does not appear to have a basis in the policies of the PLP. The former Policy HA2 Newgate Lane South site is identified as a Network Opportunity on this plan. This is not explained. This appendix should be deleted, as happened to a similar plan appended to the Regulation 19 Chichester District Local Plan.

Reinstatement of the Policy HA2: Newgate Lane South housing allocation

- 3.59 The Council omitted a number of previous housing allocation sites for the Regulation 19 PLP on the basis that the PLP plans for the reduced housing requirement of 403 hpa. We have asserted that this approach fails to comply with legal requirements and is unsound. It is foreseeable that the Council's housing requirement may increase and in such circumstances Policy HA2 should be reintroduced and updated to allocate the site for about 500 dwellings.

- 3.60 The Policy HA2 site is comprised of three SHELAA sites:

- Cops Field, Newgate Lane, Peel Common (3028);
- Land East of Newgate Lane, Peel Common (3057); and
- Land East of Newgate Lane East, Peel Common (3002).

- 3.61 In the Council's SHELAA of December 2019, the commentary on each of these sites concluded with a "Suitability" (for allocation for development) Comment. For sites 3002 and 3028 (the smaller northern and southern parcels) the Suitability Comments were:

"The site is considered suitable for development as part of the proposed housing allocation. Development could be accommodated without significant effects on the landscape character of the wider area."

- 3.62 For site 3057 (the larger central parcel) the Suitability Comment was:

"Development could be accommodated without significant effects on the landscape character of the wider area (following construction of Newgate Lane South) or the integrity of the Strategic Gap...."

3.63 All three component parcels of the HA2 site were described as Suitable, Available and Achievable. Nothing has changed in this regard.

3.64 In omitting Policy HA2 from the PLP, the Council also updated its SHELAA for consistency with the PLP and justified the omission of the HA2 allocation due to the impact of development on the strategic gap, and the fact that the site is a low use SWBG site. Gosport Borough Council also previously objected to the HA2 allocation due to its alleged traffic impact on Newgate Lane East. Taking each of these matters in turn:

Strategic Gap:

3.65 These representations are accompanied by a Preliminary Landscape and Visual Appraisal prepared by Pegasus Group of the former Policy HA2 site, Newgate Lane South. This study concludes that the part of the gap between Peel Common and Bridgemary is weak and under development pressure, particularly with the recently constructed Newgate Lane East now forming such a strong urbanising feature in the local landscape context. The Policy HA2 site is not considered to form part of a priority area which is required to maintain the integrity and function of the Fareham / Stubbington Strategic Gap and it is concluded that the site is well placed to accommodate development that could come forward without significantly affecting the integrity of the gap and the physical and visual separation of settlements. This was the Council's previous conclusion when it proposed to allocate the Policy HA2 site, as evidenced by the quotations from the December 2019 SHELAA above.

Low Use SWBG site:

3.66 It is noted that Employment allocations E2 and E3 are similarly designated. These representations are accompanied by an Ecology Technical Note prepared by WYG which describes the off-site mitigation solution already advanced and agreed by the Council's ecologist in relation to a planning application for housing on the southern part of the HA2 site. Demonstrably, this is not an issue which would prevent development coming forward in principle on this site.

Transport impact:

-
- 3.67 These representations are accompanied by a Transport Technical Note prepared by i-Transport. This reports that the Council's transport evidence base was substantially prepared before the Council amended its spatial strategy in response to the draft revised Standard Methodology housing target so it included assessments of the Policy HA2 site, together with other housing allocations since omitted including the two Strategic Growth Areas (SGAs). On this basis the Council's Strategic Transport Assessment concludes that the plan is deliverable and sound from a transport perspective.
- 3.68 The Transport TN reviews the sustainable transport credentials of the HA2 site. The site is very well served by public transport – it is within a 5-10 minute walk of the South East Hampshire Rapid Transit system, and is close to local bus routes. HCC and its partners have recently submitted funding bids to Government for later stages of the SEHRT which includes a potential extension of the SEHRT to the site and the Solent Enterprise Zone. This will further improve the accessibility of the site to public transport services.
- 3.69 The site lies in close proximity (comfortable walk or short cycle trip) to major employment areas (Fareham Business Park, Newgate Lane Industrial Estate, Solent EZ) and supermarkets (such as Asda next to the site) for convenience shopping.
- 3.70 The primary vehicular access to the site will be from a new roundabout on Newgate Lane South. This has been designed to minimise interruptions to traffic flows on Newgate Lane South. The operation of this junction has been modelled, and this confirmed that the greatest queueing delay on any arm during peak periods is about 8 seconds. Thus the roundabout will operate wholly within capacity with a "Level of Service" rating of "A", classified as "Free Flow", such that it will not prejudice the benefits of the recent road project.
- 3.71 Hampshire County Council has not raised any in principle design or safety concerns with the junction and following substantial dialogue has accepted the junction modelling as a basis to consider the operation of the junction but required consideration of the corridor effects of the junction within the Local Plan evidence base.
- 3.72 This wider corridor assessment has now been completed with the release of the FBC SRTM Assessment, summarised in Section 4 of the accompanying Transport

TN. In summary this demonstrates that there are no material impacts on the wider Newgate Lane corridor that result from the delivery of an access to the HA2 site from Newgate Lane. Any objection to the allocation of the HA2 site on this basis is therefore not sustainable.

- 3.73 For all of these reasons, the Council is encouraged to reinstate the Policy HA2 housing allocation for about 500 dwellings. The site is controlled by two highly reputable housing developers – Miller Homes and Bargate Homes – who have a strong local track record of delivery and who are keen to bring it forward for development immediately, such that the site can make a significant contribution to the Council's five year housing land supply.

4.0 Participation at the examination hearing sessions

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session.

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

To contribute to testing the legal compliance and soundness of the PLP for the reasons set out in these representations.

MILLER HOMES AND BARGATE HOMES LTD

NEWGATE LANE SOUTH, FAREHAM, HAMPSHIRE

**REGULATION 19 CONSULTATION RESPONSE:
PRELIMINARY LANDSCAPE AND VISUAL APPRAISAL**



5 The Priory, Old London Road, Canwell, Sutton Coldfield, B75 5SH

T 0121 308 9570 www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

CONTENTS

1.	INTRODUCTION	2
2.	APPROACH	3
3.	LANDSCAPE AND VISUAL BASELINE	5
4.	LANDSCAPE AND VISUAL ANALYSIS	18
5.	APPRAISAL OF LANDSCAPE AND VISUAL EFFECTS	23
6.	EVIDENCE BASE ON LANDSCAPE & VISUAL MATTERS	28
7.	SUMMARY AND CONCLUSIONS	36

FIGURES:

Figure 1	Site Location
Figure 2	Site Context and Landscape Planning Designations
Figure 3	Topography
Figure 4	Landscape Character
Figure 5	Zone of Theoretical Visibility (ZTV)
Figure 6	Viewpoint Locations and PROW
Figure 7	Viewpoint Photographs 1 to 8 and A to D
Figure 8	Landscape and Visual Analysis
Figure 9	Landscape and Visual Strategy

1. INTRODUCTION

Terms of reference

- 1.1. Pegasus Group has been jointly instructed by Miller Homes and Bargate Homes Ltd to undertake a preliminary landscape and visual appraisal in relation to land to the south of Fareham, Hampshire (the site). The report has been prepared in support of representations being made to the Regulation 19 consultation on the Fareham Borough Council's publication version of the 'Fareham Local Plan 2037'.
- 1.2. The site comprises land to the south of Fareham, between Bridgemarky (Gosport) to the east and Newgate Lane East, to the west (refer to **Figure 1, Site Location**).
- 1.3. The site had previously formed a draft allocation for housing (HA2) as part of the emerging local plan, however has since been omitted from the publication version. Previous inputs on landscape and visual matters were addressed at a high level as part of a Development Framework Document for the emerging allocation. Given the site does not form a proposed allocation in the Publication Local Plan a more detailed consideration of landscape and visual matters has been prepared.
- 1.4. Consequently, this preliminary landscape and visual appraisal has been undertaken to determine the various landscape and visual constraints and opportunities regarding the site and its immediate landscape context. These are subsequently considered in respect of the development potential for this part of the landscape, and how the constraints and opportunities might influence a strategic masterplan across the wider site area; the constraints and opportunities also identify the potential for an inherent landscape strategy as part of an emerging masterplan.

2. APPROACH

Overview

2.1. The approach and methodology used for this report has been developed using best practice guidance, as set out in the following documents:

- Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition;
- Natural England (2014) An Approach to Landscape Character Assessment; and
- Landscape Institute Technical Guidance Note 06/19 (September 2019), Visual Representation of Development Proposals.

2.2. Reference has also been made to additional sources of data and information and these are referred to in the relevant sections of the baseline information. A series of supporting drawings have also been produced and are included as **Figures 1 to 9**.

Level of assessment

2.3. Principles and good practice for undertaking landscape and visual impact assessment are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹.

2.4. The third edition of the Guidelines for Visual Impact Assessment (GLVIA3) was published in April 2013. This guidance acknowledges that landscape and visual impact assessment (LVIA) can be carried out either as a standalone assessment or as part of a broader EIA. The GLVIA3 note that the overall principles and core steps in the process are the same but that there are specific procedures in EIA with which an LVIA must comply.

2.5. This report has been prepared as a 'preliminary landscape and visual appraisal' (PLVA). The report addresses matters of individual landscape resources, landscape character areas/types and representative viewpoints.

2.6. The PLVA draws on professional judgement in relation to sensitivity of receptors (both landscape and visual), the nature of impacts and consequential likely effects. This

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

process informs judgements on a landscape mitigation strategy which will avoid, reduce or remedy adverse impacts.

- 2.7. Landscape features and elements provide the physical environment for flora and fauna and the associated importance of biodiversity assets. This PLVA does not consider the value, susceptibility or importance on ecology and biodiversity, nor does it consider impacts from an ecological stance.
- 2.8. Heritage assets such as Scheduled Monuments, Listed Buildings and Conservation Areas all contribute to the overall present-day landscape character, context and setting of an area. These aspects have been given consideration in the PLVA in terms of physical landscape resources (for example trees and hedgerows) and landscape character. However, this PLVA does not address the historic significance, importance or potential impacts on heritage assets and designations; these assets are assessed in the context of landscape and visual matters only.

Collating baseline information

- 2.9. To capture a comprehensive description of the baseline position for landscape and visual receptors, information has been collated using a process of desk study and field survey work.
- 2.10. The desk study includes reference to published landscape character studies and other published policy documents relevant to landscape and visual matters.
- 2.11. Field survey work was completed during December 2020. A series of representative photographs were taken with a digital camera with a 50mm lens (equivalent focal length) at approximately 1.8 metres in height. These are presented as a series of representative viewpoints and have been used to inform both the landscape and, separately, visual appraisal work (included as **Figure 7, Viewpoint Photographs 1 to 8 and A to D**).

Consideration of effects

- 2.12. Having established the relevant baseline position, the PLVA process then considers landscape receptors and visual receptors, specifically in response to the nature of the proposed development, it identifies the nature of potential impacts and consequently, how these can inform an iterative approach to design and mitigation.

3. LANDSCAPE AND VISUAL BASELINE

Site overview

- 3.1. The site is located on the southern edge of Fareham, its western boundary defined broadly by the route of Newgate Lane East (relief road, completed April 2018) and its eastern boundary situated directly adjacent to the urban area of Woodcot and Bridgemary in the borough of Gosport (refer to **Figure 1, Site Location**). Existing sports pitches and playing fields related to HMS Collingwood are located adjacent to the northern edge of the wider site area with Brookers Field recreation ground located immediately to the south to the south.
- 3.2. The land is situated toward the northern extent of the Alver Valley, but at this point the subtle valley formation is lost and the topography of the site is largely flat, forming a wider plain of very slightly more elevated landscape between the valleys of the River Meon and River Watlington that are situated to the west and east respectively (refer to **Figure 3, Topography**).
- 3.3. Drainage ditches with associated hedgerows and occasional field trees divide the site into a series of field parcels, currently in agricultural use. There are heavily treed boundaries to Brookers Lane to the south, the northern fields adjacent to the HMS Collingwood sports pitches, and along the eastern boundary with Woodcot and Bridgemary.
- 3.4. The settlement edge of Woodcot and Bridgemary is characterised by the low to medium density residential areas, comprising a mix of semi-detached and small terraces of predominantly two storey housing with occasional enclaves of detached bungalows. The development is characterised by treed streets with grass verges, generous front gardens and pedestrian green spaces and small parks. To the north and north-west, the settlement edge of Fareham contrasts with this, characterised as it is by 'Speedfields Park' and HMS Collingwood, which together comprises large retail warehouse buildings with associated car parking, along with the institutional character of the naval base. To the west is the existing alignment of Newgate Lane East with the ribbon development along Newgate Lane further west and forming the 'satellite' settlement area of Peel Common.
- 3.5. The wider landscape context is set within the low-lying ground of the coastal plain landscapes and characterised by the often abrupt transitions between the open landscapes of the coastal plain and the urban environments which abut these (including

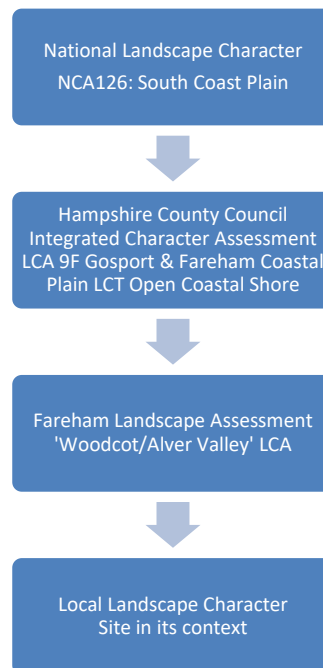
Fareham, Woodcot and Bridgemary). The settlement area of Stubbington, a medium scale, predominantly residential area is located to the west, forms the western extent of the Fareham to Stubbington strategic gap. In this context the strategic gap comprises an area of open landscape that extends across the coastal plain between the local settlement areas. Separation is most pronounced across the arable areas between Fareham/Peel Common and Stubbington.

- 3.6. The site is located outside the defined settlement boundary identified in the Publication Plan policies map, in a 'Strategic Gap' known as the Fareham/Gosport to Stubbington/Lee on Solent Gap (or simply the Fareham - Stubbington Gap) (refer to **Figure 2, Site Context and Landscape Planning Designations**).
- 3.7. The site is not subject to specific statutory or non-statutory planning designation specific to landscape related matters. Nor is the site included within an 'Area of Special Landscape Quality' as defined by the Publication Plan.
- 3.8. Additional information and a more detailed description on the physical components, landscape character and visual amenity of the site and study area are set out in later sections.

Landscape character

- 3.9. Reference has been made to published guidance on landscape character for the area. The site is located in the following landscape character types/areas (refer to **Figure 4, Landscape Character**):

Plate 1: Summary of landscape character hierarchy



3.10. The following sections set out a summary of the characteristics relevant to the site and its local context.

National landscape character

3.11. At a national level, the site is situated within the National Character Area (NCA) 126, the South Coast Plain (NE525, Natural England)². Where relevant to the site and its landscape context, the key characteristics of NCA 126 are summarised as follows:

- The plain slopes gently southwards towards the coast...;
- The underlying geology of flinty marine and valley gravels extends several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high quality soils;
- In places, streams and rivers flow south from the higher land of the Downs to the sea;
- There are stretches of farmed land between developed areas, often with large arable fields defined by low hedges or ditches;
- There are isolated remnants of coastal heath in the west;
- Along the exposed, open coastal plain and shoreline, tree cover is limited to isolated wind-sculpted woodlands and shelterbelts; and

² Natural England, National Character Area 126: South Coast Plain (NE525) (24 February 2014)

- The area has significant urban development, with settlements along the coastline dominated by the Portsmouth conurbation, suburban villages and seaside towns including Bognor Regis, Littlehampton and Worthing linked by major road and rail systems.

3.12. Given the scale and diversity of key characteristics across the NCA, the landscape components that define character at this level are represented across the wider context of the NCA. Consequently, changes at a site level will be relatively small scale and not likely to impact upon landscape character as defined by the NCAs. The NCA guidance does however give an indication of key characteristics relevant to the surrounding landscape context.

3.13. In order to complete a more detailed appraisal of potential landscape and visual issues, reference has been made to the published landscape character assessment prepared at a finer grain and more local scales.

County landscape character

3.14. Hampshire Country Council have produced an Integrated Character Assessment³ (ICA) which considers landscape character across the county. The site is located in an area defined by the ICA as LCA: '9F Gosport and Fareham Coastal Plain'.

3.15. The 9F character area is located north of the Solent and west of Portsmouth Harbour. Its boundaries to the south and east are defined by the coastal landscape and its northern and western boundaries by Portsdown chalk escarpment and the Meon river valley respectively. The key characteristics are summarised as follows:

- A low lying landscape which physically forms part of the coastal plain but is isolated from the coastline by the development;
- Drained by shallow valleys of the River Alver and Wallington in the east and by small streams running into the Meon to the west;
- Predominantly light soils which are of high agricultural quality with heathier soils in the extreme south and shingle on the foreshore;
- In the south, grassland pasture dominates while to the north there are large arable fields with no significant boundary vegetation;

³ Hampshire Integrated Character Assessment – Final May 2012

- The area is strongly influenced by the adjoining urban areas of Gosport, Stubbington and Fareham, and by defence infrastructure;
- The Solent coast draws visitors, particularly local residents for various leisure activities including angling, sailing and walking;
- Numerous small parks and allotments; and
- Varied coastal views including across Portsmouth harbour and the city skyline which contrast with views across busy stretch of the Solent.

3.16. At a sub-level the LCA is then broken down further in to LCT's. The site is located in the 'Open Coastal Shore'. The guidance notes that LCT is generally situated at less than +2m AOD in elevation, open and exposed to the elements, and that the coastline is subject to a continual process of erosion, deposition and change.

3.17. The key characteristics that define this LCT are summarised as follows:

- This coastal shoreline landscape type can be formed on sand, shingle or mud, is above the mean low water mark and can extend in land to include cliff faces, creeks, salt marsh, grazing salt marsh, (rather than coastal grazing marsh) beaches and sand dunes;
- Adjoins the more open coastal waters of the Solent rather than the estuaries and harbour shores;
- Predominantly comprised of muds and shingle – the profile and sediment content affected by sea defences such as groynes;
- The Hampshire coast is rich in depositional features such as spits and bars;
- Often associated with internationally important designations such as the Solent marine SAC;
- Includes shingle, saltmarsh, sand dune and cliff habitats;
- The more sheltered areas were historically important for salt production – the remains of the salterns are a distinctive feature such as at Lymington and Pennington;
- Sand dunes are rare – occurring only on Hayling Island;
- Artificial beech replenishment to help protect the coast is an integral part of the coast management; and
- The shingle beaches are historically a focus for holidaymakers and integral to the establishment of Victorian beach related development of villas and tall terraces overlooking these areas.

- 3.18. As with the NCA, the landscape components that define character at this scale of LCT are also represented across the landscape and, although this study represents a finer grain scale of assessment, changes at a site level will remain small scale relative to the LCT and impacts are not likely to be significant.
- 3.19. In order to complete a more detailed appraisal of potential landscape and visual issues, reference has been made to the published landscape character assessment prepared at a finer grain and more local Borough scale.

Borough landscape character

- 3.20. The Fareham Landscape Assessment (FLA)⁴ is a compendium of documents that form part of the evidence base for the emerging (publication) local plan.
- 3.21. Prepared in 2017 the FLA comprises three distinct sections that set out a landscape character assessment, an assessment of capacity and sensitivity and also a review of the strategic gap policy. A fourth section includes the appendices of the FLA.
- 3.22. The FLA has been prepared independently, focussing on the contemporary landscape and its inherent characteristics. The FLA has not been prepared in order to test emerging proposals for allocations and consequently does not reflect the potential influence that these emerging proposals and allocations will have on the baseline landscape character. The documents states that:
- 3.23. *"...assessment findings are based upon the professional judgement of the qualified landscape architects/planners within the consultant team and have not been influenced by, nor tested against, the opinions of the Council or the public."*
- 3.24. The benefit of the more local level assessment of landscape character over the broader character assessment at regional and county levels is that it undertakes the assessment at a more detailed level. Therefore, the finer grain of analysis accounts for the context of the wider landscape and places the site in a more specifically defined area of character.
- 3.25. The FLA identifies the site as being located within an area defined as LCA 8 (sub area 8.1), the 'Woodcot/Alver Valley' and directly adjacent to LCA 7, the 'Fareham/Stubbington Strategic Gap'.

⁴ Fareham Landscape Assessment (LDA Design on behalf of Fareham Borough Council, 2017)

3.26. The Fareham LA describes LCA 8 as:

3.27. *"The Alver Valley also forms part of the strategic gap separating Fareham and Gosport but it is very different in character and scale from the open farmed landscape to the west. It comprises a mixed pattern of wooded common, small-scale pasture and ribbon development along the corridors of the River Alver and Newgate Lane and is bounded to the east by the urban edge of Gosport and to the north by the outskirts of Fareham."*

3.28. Key essential characteristics of LCA 8 are defined by the FLA guidance as:

- A mosaic of small and medium scale fields at Woodcot, forming a mixture of small horse grazed pasture and larger arable fields divided by fences, ditches and gappy hedgerows;
- Although this area forms the upper part of the Alver Valley it lacks a distinct valley character;
- The hedgerow pattern is gradually replaced by scrubby woodland to the south, enclosing Chark Common and the golf course; and
- The character is influenced by the busy road corridor and the urban characteristics of Peel Common and Solent Enterprise Zone at HMS Daedalus on one side and the urban edge of Bridgemary on the other.

3.29. The FLA separates the LCA into sub areas, including: 8.1a (north of Woodcote Lane, comprising predominantly agricultural land); 8.1b (the existing sports pitches associated with HMS Collingwood); and, Area 8.2a (broadly extending between Woodcote Lane and Peel Common roundabout and incorporating the residential area of Peel Common as well as incidental agricultural fields and part of Brookers Field recreation ground).

**Plate 2: Extract from FLA illustrating sub areas to LCA 8
(excluding Newgate Lane East)**



- 3.30. In relation to the settlement character the FLA guidance notes that the site forms part of a swathe of largely undeveloped agricultural landscape that lies between the urban areas of Fareham in the north, Stubbington in the west and Gosport in the east, providing clear visual and physical separation of these settlements. It suggests that that the area has a significant role in separating the settlements and prevention of coalescence and refers to the Strategic Gap policy to which this relates. However, in relation to the site, the guidance goes on to state that:
- 3.31. *"The role of the area in separating Stubbington and Gosport is less easily perceived because of intervening development and other features that interrupt views, and occupy land, between the two areas. These include the Newlands Solar Farm, the waste water treatment plant and housing development along the western side of the Newgate Lane corridor at Peel Common."*

- 3.32. Existing features such as the solar farm and waste water treatment plant are incorporated within the strategic gap boundary.

Landscape character summary

- 3.33. From the detailed evaluation undertaken for this LVIA, the immediate context to the site does share a number of characteristics identified in the baseline landscape character assessments described above.
- 3.34. Aspects of the site and the local landscape context which are considered to be consistent with published guidance include:
- the site forms a part of the low lying landscape which physically forms part of the coastal plain but is isolated from the coastline by other areas of settlement and highways infrastructure;
 - the site and its surroundings form a part of the Alver Valley however the very flat coastal plain nature of the landform means that it lacks the distinct valley character;
 - the site comprises several small to medium scale, mixed agricultural fields and this contrasts with the wider, predominantly arable, landscape to the west between Fareham and Stubbington;
 - although the site comprises a pocket of agricultural landscape in itself, it is influenced, strongly on its fringes, by the existing settlement edge and highways infrastructure and also by adjacent amenity landscape uses in the form of sports pitches and playing fields; and
 - The site and surrounding area, towards Woodcot, have a lesser role in terms of the Fareham to Stubbington gap, partly due to the presence of the solar farm, waste water treatment works and residential development at Peel Common, all of which create a separate urban edge to the gap than that of the residential areas at Gosport.
- 3.35. The Fareham Landscape Assessment provides a relatively comprehensive analysis of the site and study area at a more localised level of detail, however the timing of the assessment is such that key landscape changes in the form of the Newgate Lane East relief road are predicted, rather than observed. The sub areas of the assessment provide detailed descriptions of focused pockets of landscape within a larger LCA however these can focus on individual land uses, and lose their context in terms of the overall landscape character in this part of the landscape and urban fringe. It is therefore considered

appropriate to undertake a more detailed analysis of the site in its local landscape context.

- 3.36. Together, the published FLA, along with analysis of the local landscape context of the site, identifies a number of matters which can inform and influence the appropriateness of a site for development and the design of a scheme within this. These are considered as part of the landscape strategy for the proposed development, as described later in this PLVA.

Visual baseline

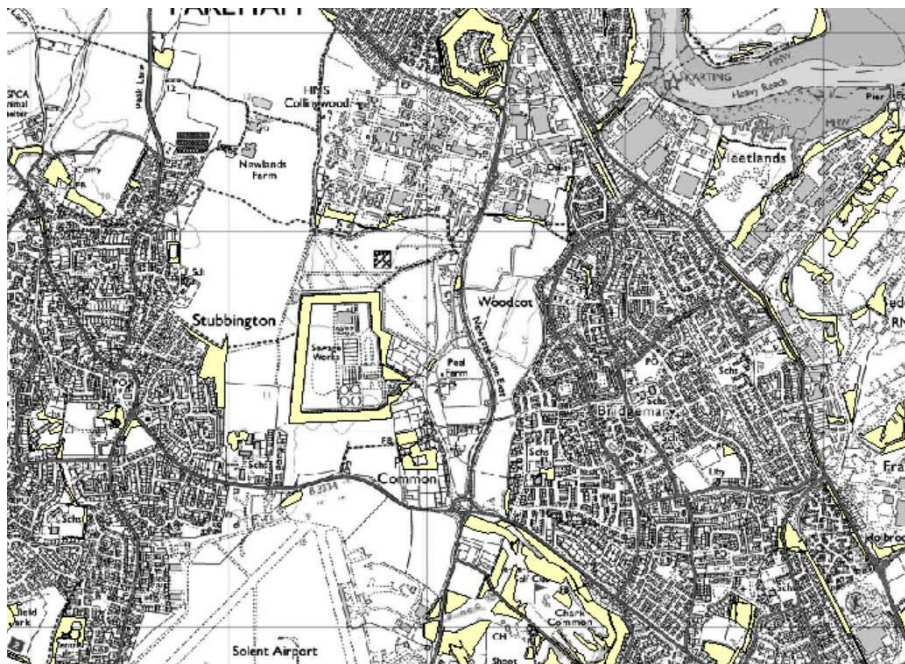
- 3.37. This section provides a description of the nature and extent of the existing views from, towards and between the site and the surrounding area. It also includes reference to specific locations that will potentially be subject to impacts as a result of the proposed development of the site.
- 3.38. Establishing the specific nature of these views provides an understanding of the context and setting of representative viewpoints and also the nature of views in terms of distance, angle of view, and seasonal constraints associated with specific visual receptors. The identification of key sensitive receptors and links to the representative viewpoint are carried forward to the assessment process (refer to **Figure 7, Viewpoint Photographs 1 to 8 and A to D**).

Overview

- 3.39. The visual envelope is the area of landscape from which a site or proposed development will potentially be visible. It accounts for general judgements on the theoretical visibility of a site or proposed development and sets a broad context for the study area within which to address landscape and visual impacts. The extent of a visual envelope will be influenced by the physical landscape components of an area, such as hedgerows, woodlands or buildings and can also be influenced by distance from a site.
- 3.40. A computer generated ZTV has been produced for the wider site area. This is based on initial assumptions regarding the potential for development (including building heights) and accounts for some degree of screening by existing built form and vegetation. The ZTV gives an overview of potential visibility and has been used to inform the site visit and field work (refer to **Figure 5, ZTV**).
- 3.41. Although the ZTV represents a 'screened' scenario, the OS data sources only tend to include substantial blocks of trees and woodland. With much of the existing green

infrastructure around the site comprising smaller scale woodlands and tree belts, these are not included in the ZTV (refer to **Plate 3**), with screening value underestimated as a result. The ZTV does, however, show a worst-case scenario.

Plate 3: Illustration of woodland cover included in OS data



3.42. Based on the ZTV and informed by subsequent site survey and observations from the field work, the visual envelope is broadly defined as follows:

- To the north, the visibility of the site and potential development is restricted to a short section of Newgate Lane and the northern most section of Newgate Lane East. There is also likely to be some limited visibility from the public rights of way to the north-west, although these will be partially screened by the solar farm and green infrastructure. Partial views will also be available from the public footpath between Newgate lane and the residential edge of Woodcot, including the open spaces. Although private, users of the sports pitches will also have limited views into the northern part of the site;
- To the east, the visibility of the site is restricted to locations on the very edge of Woodcot and Bridgemark. This is generally restricted to the upper storeys of residential properties situated on the very edge of the settlement, views from ground floor levels and the street scene being screened by intervening vegetation. The relief road is highly visible from the east, large sections of the route being defined by tall acoustic barriers;

- To the south, despite superficially appearing more open, the visibility of the site and potential development will remain restricted. This will include several properties located off Woodcote Lane and off Newgate Lane – these locations having direct views into the southern parts of the site with Newgate Lane East also forming a key part of these views. There are also likely to be some limited views from Brookers Field recreation ground, but views further south will be screened by highways and green infrastructure; and
- To the west, the visibility of the site is limited to the route of Newgate Lane and associated residential properties. Views from locations further west (including public footpaths) will be screened by various parts of the green infrastructure network, particularly those associated with the waste water treatment works and around Peel Common. From the west, there are not likely to be any views from locations associated with the wider strategic gap between Fareham and Stubbington.

3.43. Overall, views of the site, and likely views of the potential development, are restricted to a very limited area, including the boundaries of the site itself (noting that there is no formal public access across the site) and from locations in the immediate context of the site.

3.44. Within this overall visual envelope there are variations in the degree of inter-visibility between areas and in the nature and extent of views. Overall these are tested further through the detailed field work and the consideration of visual effects.

Representative viewpoints and visual receptors

3.45. The visual assessment references a series of viewpoints that are representative of visual receptors in the area. These illustrate views towards the site in the context of the surrounding landscape and are used to inform judgements on impacts for specific receptors (refer to **Figure 6, Viewpoint Locations and PROW** and **Figure 7, Viewpoint Photographs 1 to 8 and A to D**).

3.46. Representative visual receptors include:

- Near distance recreational receptors such as walkers using the network of rights of way adjacent, and in close proximity to, the site;
- Recreational receptors such as walkers using the network of public rights of way further afield, particularly in the wider arable landscape to the west and across the core area of the strategic gap;

-
- Receptors associated with the edges of the local settlements, including Woodcot and Bridgemary;
 - Residential receptors associated with Peel Common, including those on Newgate Lane and Woodcote Lane; and
 - Users of the local transport network in particular Newgate Lane and Newgate Lane East to the west and Gosport Road to the south.

3.47. These visual receptors are considered further as part of the appraisal of visual effects.

4. LANDSCAPE AND VISUAL ANALYSIS

Overview

- 4.1. The site represents a relatively 'ordinary' part of the landscape, located directly adjacent to the settlement edge and forming part of a gradual transition between the coastal landscapes to the south and the more open coastal plains to the north and west.
- 4.2. In itself, the wider site represents a pocket of the agricultural landscape comprising a mixed scale field pattern, divided by a series of hedgerows and linear tree belts. These compartmentalise the wider site area into a smaller scale series of enclosures. The overall perception of scale is difficult to interpret given the frequent barriers to views across this part of the landscape, which include both physical built form and layers of mature vegetation.
- 4.3. The wider site area is framed by the prominent urban fringe and by highways infrastructure. To the north the urban fringe includes the relatively more open amenity sports pitches associated with HMS Collingwood, but that is otherwise characterised by the more substantial urban edges at HMS Collingwood and the retail parks. To the east the site is strongly delineated by settlement edge of Gosport, including Bridgemary and Woodcot where the residential areas influence the fringes of the site. To the south and west, there is a strong influence of highways infrastructure which form connections between Gosport and Peel Common, the latter forming a small settlement parcel or satellite comprised mainly of ribbon development along the route of Newgate Lane. Also to the south is the amenity landscape of Brookers Field Recreation Ground, bordered to the north and west by more substantial tree planting but connected to the edge of Gosport and also influenced by the large scale noise attenuation of Newgate Lane East.
- 4.4. In summary the site sits within a variable pocket of landscape. In isolation the site comprises remnant agricultural enclosures however it cannot be separated from the extensive urbanising influences which surround and frame it, particularly in the context of the more recent severance of the agricultural land that has arisen from the route of the bypass (Newgate Lane East East).
- 4.5. Consequently the condition of the landscape is mixed and, furthermore, with a lack of formal public access, there are few opportunities to experience the more positive aspects of the landscape, other than from confined locations on the residential or amenity context adjacent to the site, and not within it.

- 4.6. Overall the value, susceptibility and sensitivity of the site are influenced by these matters, contributing to some potential capacity to accommodate development, but also highlighting that if there is development potential, there are also some landscape components that present 'inherent' sensitivities that can be addressed through a comprehensive and considered approach to mitigation.
- 4.7. There remains some more specific constraints and opportunities for the site, which will influence the potential for development on the site, along with its spatial extent. These matters are considered further in the following sections.

Landscape and visual constraints and opportunities

- 4.8. The following key constraints and opportunities have been identified during the landscape and visual analysis (including reference to field work and desk study of landscape character guidance) (refer also to **Figure 8, Landscape and Visual Analysis**).
- 4.9. The landscape and visual analysis is considered further in terms of defined constraints and opportunities within the site and study area; these are then used to inform the development of a design and masterplan.
- 4.10. Overall, by taking an approach that places landscape and landscape character at the heart of the design approach, this helps to deliver good design which responds to local character, landscape components and green infrastructure.
- 4.11. Constraints associated with the site are summarised as follows:
- Existing landscape components and vegetation structure, including the open agricultural context and the associated network of hedgerows, both within and on the boundaries of the site – together these would need to be retained wherever possible and will require appropriate stand offs from potential development areas;
 - The contribution of the wider site area to the Stubbington and Fareham strategic gap, noting that there are limitations to its contributions and condition/quality;
 - Views and potential visual impacts from adjacent publicly accessible locations (including public footpaths and open spaces) as well as from some residential receptors and, to a lesser extent, views from Newgate Lane East (noting that all views are near distance and concentrated around the site);

4.12. Opportunities for the site are considered to be:

- The lack of any overriding designations specific to landscape on site and in the surrounding landscape context;
- Landscape character guidance recognises the detracting influence of urbanising elements in the area – these now essentially surround the site in the form of the urban edge, residential areas of Gosport, route of Newgate Lane East and adjacent amenity land uses;
- That there is currently no formal public access to the site and that opportunities for access nearby are limited to adjacent amenity playing fields and sports pitches, or two short sections of rights of way;
- Separation between Woodcot and Stubbington will be maintained by the more extensive, larger scale area of arable land that is located to the west of Peel Common (including the waste water treatment works and residential areas) and that this is physically and visually separated from the site;
- The scale of the site is sufficiently large enough to accommodate a range of green infrastructure and open spaces and provide flexibility in the layout to retain and enhance the existing landscape components where appropriate;
- That there remains scope to deliver strategic green infrastructure between nearby landscapes to then north and south, particularly focussed on linear green infrastructure along the route of Newgate Lane East along with potential landscape buffers;
- Aside from locations on or immediately adjacent to the site, the relative containment and screening that is present in the form of existing mature vegetation and built form which limits views from the wider landscape and increases the capacity of the site to accommodate residential development; and
- The existing settlement pattern and the ability to proceed with a development area that is consistent with the existing settlement edge and which would not unduly intrude into the wider countryside, particularly into the strategic gap to the west.

4.13. The analysis of these can be used to inform the design process and to avoid or minimise potential impacts.

Landscape and visual strategy

4.14. The analysis of landscape and visual constraints, opportunities and likely impacts can be used to inform a landscape strategy for the site.

- 4.15. The strategy includes the definition of the spatial extent of a potential development envelope (i.e. where built form would be located) as well as proposals for key green infrastructure and associated open spaces.
- 4.16. The following components of the landscape strategy that have been incorporated into the initial design of the proposed development are summarised in the following table (refer also to **Figure 9, Landscape and Visual Strategy**).

Table 1: Summary of integrated landscape and visual mitigation

Strategy component	Key points
Development envelope	<ul style="list-style-type: none"> <i>The development envelope is split into to a series of broad parcels in order to retain existing green infrastructure which divides the site currently;</i> <i>The approach retains several internal field boundaries and in turn is reflective of the scale and pattern of the landscape at a local level; and</i> <i>The development envelope includes set backs from the majority of the site boundaries in order to provide a suitable stand off to adjacent uses as well as facilitate retention of and enhancement of the green infrastructure around the site boundaries.</i>
Existing vegetation strategy	<ul style="list-style-type: none"> <i>Retain and enhance existing vegetation across the site wherever possible; and</i> <i>Enhancement proposals to include appropriate management (such as hedge laying) and new planting as appropriate to reinforce boundaries, improve species diversity, ensure succession.</i>
Green infrastructure and open space	<ul style="list-style-type: none"> <i>Set back of the development envelope from the western boundary to facilitate SUDS that equally form part of a wider strategic green infrastructure corridor on that edge of the site;</i> <i>A stand off and inclusion of linear open space along the northern edge of the site to maintain a green corridor adjacent to the existing public footpath and open space;</i> <i>A strategy for landscape planting that will complement and enhance the existing green infrastructure network with green corridors wide enough to accommodate new planting of native species (including substantial hedgerows, tree belts and woodlands) to provide green infrastructure connectivity and to draw local landscape character through the site;</i> <i>Provision of new recreational access in the form of green links and public open spaces, particularly with pedestrian/cycle connectivity to adjacent open spaces and residential areas; and</i> <i>Potential to include amenity open space, play areas and community areas within the public open space areas.</i>

-
- 4.17. In summary, at this stage of the design and appraisal process, the landscape strategy is intended to provide a framework for the development proposals for the site that reflect an immediate landscape structure, subsequently supported by additional and enhanced landscape proposals. This will serve to integrate the proposals into the local landscape context from the outset, and further mitigate potential impacts into the medium and longer term.
- 4.18. The appraisal of landscape and visual impacts proceeds on the basis of these measures forming an inherent part of the proposed development.

5. APPRAISAL OF LANDSCAPE AND VISUAL EFFECTS

Overview

- 5.1. Having considered the constraints, opportunities and potential capacity for development on the site, including the embedded mitigation, this section considers the potential landscape and visual effects that might arise.
- 5.2. Although a landscape has some intrinsic sensitivity, different landscapes may contain various elements and features that respond differently to change, subject to the type of the development being proposed.
- 5.3. Consequently, in order to reliably inform an analysis of impact and effect, judgements should be made with reference to the changes arising from a specific type of development. The following section sets out the likely causes of impacts which would occur in relation to the specific type of development proposed, i.e. residential development.

Likely causes of impact

Causes of temporary impact during construction

- 5.4. The temporary construction works which may give rise to impacts on landscape and visual receptors are listed as follows:
- site clearance (including vegetation clearance) and accommodation works;
 - movement and presence of associated construction vehicles and plant;
 - presence of construction compounds, site offices and welfare facilities;
 - earthworks and construction of internal road infrastructure;
 - formation of practical development platforms (albeit given the landform this is likely to be minimal); and
 - temporary measures related to protecting retained vegetation and, for areas of advanced planting as part of the proposed, the ongoing establishment of this during construction.

Causes of impacts at completion

- 5.5. The permanent components of the proposed development which may give rise to impacts on landscape and visual receptors are listed as follows:

- the built form of residential development (incorporating highways infrastructure); and
- mitigation integrated into the proposed development (i.e. green infrastructure, open space and strategic landscaping), including retained trees, hedgerows, open space provision, SUDs and attenuation areas, new planting and footpaths.

Likely landscape effects

- 5.6. Likely landscape impacts will be concerned with the physical changes to the site and the loss, or potential loss, of physical elements and features. For the site, this would largely be limited to some short sections of hedgerows internally within the site and hedgerows/scrub vegetation on the site boundaries where access into the site is required.
- 5.7. Aside from the physical changes to land use and, to a lesser extent, existing vegetation, the landscape impacts will be concerned with the perception of these changes and subsequent impact on the character of the landscape.
- 5.8. There will be limited change to the underlying topography of the site and, given that the development envelope has been divided to respect the scale and pattern of the current field enclosures, these aspects of the landscape will remain intact. However, whilst the scale and pattern of the landscape is respected and integrated into the masterplan, it is recognised that impacts will arise on the basis that this framework will be incorporated into the residential area, rather than forming the framework to the current agricultural context.
- 5.9. These changes will be limited to the site area only. Perception of change in terms of landscape character will extend beyond the site area, however given the containment of the site (physically and visually) by existing urban edges and other areas of green infrastructure, the perception of any change will be highly localised.
- 5.10. Change to the character will include the extension of the settlement edges in this part of the landscape. However, such a change will be experienced against the backdrop of the existing settlement edges and other urbanising influences. These include long sections of relatively prominent residential development (at Bridgemary and Woodcot), amenity landscapes (playing fields and sports pitches), the more commercial influence of buildings at the Speedfields Retail Park and also the substantial complex of HMS Collingwood. These all form part of the baseline against which the impacts on the site will be set and consequently this limits the overall degree, or magnitude, of change.

- 5.11. Green infrastructure and landscape structure planting will contribute to the mitigation of impacts of the built components of the proposed development. In terms of mitigation inherent in the proposed development, additional benefits to existing landscape elements will be achieved through the use of both native and ornamental planting, as appropriate, and the implementation of long term management and maintenance plans to ensure that these existing and proposed landscape components continue to establish and mature and form additional screening and filtering around and within the site.
- 5.12. In terms of the strategic gap, the gap in this part of the landscape is already degraded in terms of its physical separation between Fareham, Woodcot and Bridgemary and also with Peel Common effectively connected to Gosport through the highways infrastructure and amenity spaces to the south of the site. Around the site there is little sense of separation from the urban edge of Fareham with urban edges and features being prominent to a greater or lesser degree from the majority of this area. Conversely, the landscape to the west represents a far stronger part of the gap, with a genuine sense of separation between Stubbington and defined to the east by the western edges of Peel Common and the wastewater treatment works (and their associated green infrastructure). As such, development on the site would not be perceptible from this part of the gap and the physical and visual separation between Stubbington and Fareham can be maintained.

Likely visual effects

- 5.13. Although there is some overlap between landscape and visual effects (largely in relation to the ability of people to experience/perceive a landscape), potential visual effects are addressed separately to landscape effects.
- 5.14. The likely visual impacts associated with the proposed development will be limited to a range of receptors in the immediate and local context of the site. These are generally limited to:
- the public footpath connecting Newgate Lane and Tukes Avenue, where the route runs immediately adjacent to the northern edge of the site (refer to **Figure 7, Viewpoints 1 and 2**);
 - the footpath and cycle connection immediately adjacent to the southern edge of the site, along Brookers Lane, connecting Woodcot Lane and Newgate Lane East to Brookers Lane at Bridgemary (refer to **Figure 7, Viewpoint 5 and 6**);

- recreational open spaces to the north and south of the site, limited to Turks Avenue open space and Brookers Field recreation ground (refer to **Figure 7, Viewpoints 2 and 8**);
- local roads directly adjacent to, or close to, the site, including Newgate Lane (refer to **Figure 7, Viewpoint D**), Newgate Lane East and Woodcote Lane (refer to **Figure 7, Viewpoints 5 and 7**), and potentially a short section of Rowner Road (B3334) to the south of the site;
- existing residential receptors whom all have varying degrees of outward visibility toward the site subject to main aspect, dwelling type and offset to the site, screening by existing vegetation – examples include dwellings off Woodcote Lane, Newgate Lane (more limited to those located north of Woodcote Lane) (refer to **Figure 7, Viewpoint C**) and the settlement edge of Bridgemary and Woodcot (refer to **Figure 7, Viewpoints 3 and 6**); and
- the sports pitches associated with HMS Collingwood, to the north-west of the site, although these are of lower sensitivity given the attention of user groups is less focussed on the landscape (refer to **Figure 7, Viewpoint 1**).

- 5.15. The majority of views, and potential impacts that are likely to be of higher significance, are effectively all from locations directly adjacent to the site, or very close to the site. this type and level of visual effect will be common to most, if not all, development in settlement edge locations. However, less common is the lack of formal public or recreational access across the site area in the form of open spaces or rights of way. Consequently, potential visual effects for recreational users within the landscape are also very limited.
- 5.16. In terms of the context for views, and the implications for judging the degree of change (or magnitude of impact) the urban environment is present in almost all views through the area.
- 5.17. In locations to the south, between Peel Common and Bridgemary, the residential built form in these areas overlooks Brookers Field recreation ground and is prominent from the local roads, rights of way. Related to the northern parts of the site, Peel Common and Bridgemary are less prominent, but a balance is apparent in the form of residential edges at Woodcot and the more substantial built form of HMS Collingwood. Any change in views will be experienced against this back drop which, along with the limited intervisibility across the wider landscape between Fareham and Stubbington, all serve to limit visual effects overall.

-
- 5.18. In relation to visual effects, consideration should also be given to the ability to mitigate potential impacts. Previous sections of this PLVA have outlined the opportunity to embed a comprehensive landscape strategy into an emerging masterplan. This can incorporate the existing network of hedgerows and trees and enhance this through the provision of new landscape planting and creation of open spaces within the overall site. Together, these components become established to an extent that views from the surrounding landscape are either fully screened, or partially screened and softened. The ability to successfully mitigate potential impacts is a key consideration in the appraisal of potential visual effects

6. EVIDENCE BASE ON LANDSCAPE & VISUAL MATTERS

- 6.1. The publication plan relies on a number of evidence base documents and technical studies, several of which are related to landscape and visual matters. This section of the PLVA considers these documents and implications in terms of the site and potential for development of the site.

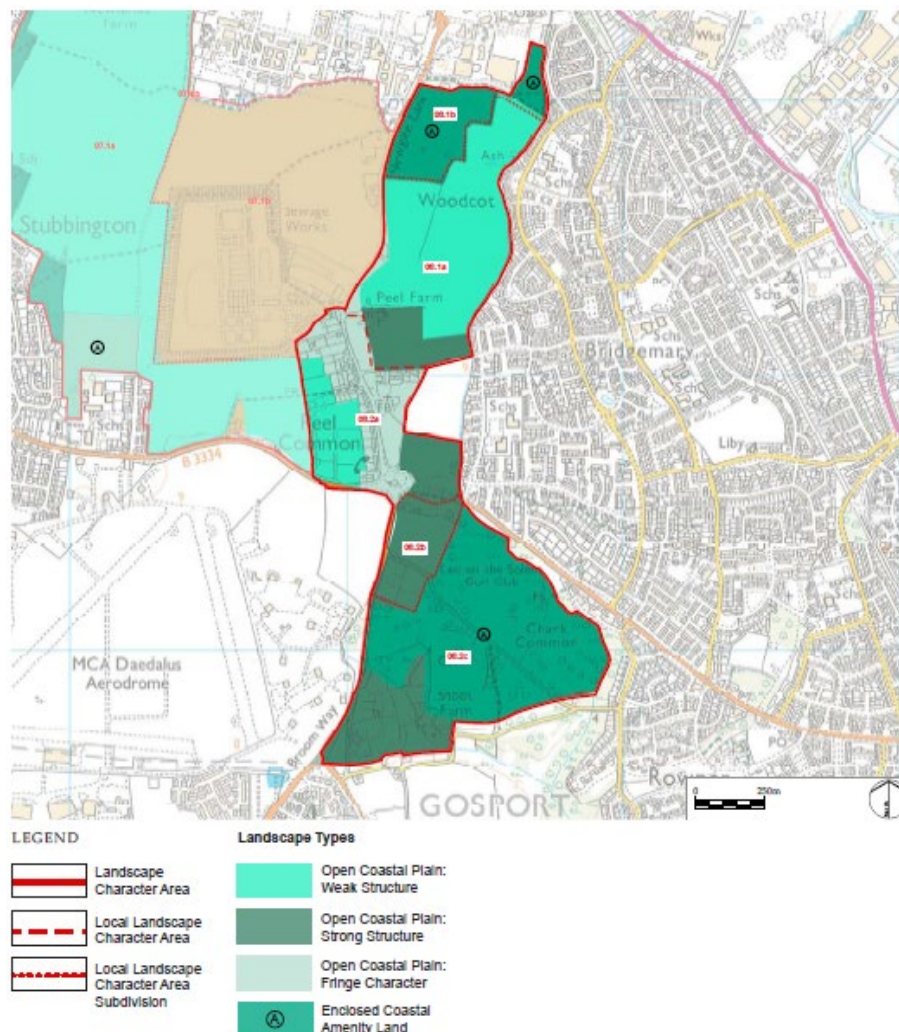
Landscape Sensitivity

- 6.2. Earlier sections of this PLVA make reference to the FLA in terms of the baseline landscape character and that the FLA⁵ includes an analysis of landscape sensitivity as part of the overall compendium of documents.
- 6.3. Looking to the assessment of sensitivity set out in the FLA, in relation to LCA 8, the guidance states that:
- 6.4. *"...the sensitivity of the landscape resource within area 8.1a is judged to be high (moderate to high value and high susceptibility to change), with very limited capacity to accommodate development without a significant impact on the integrity of the area's rural, agricultural character..."*
- 6.5. *"...Area 8.2a is already substantially degraded by urban influences and has a predominantly 'fringe' character which reduces its sensitivity to change..."*
- 6.6. It goes on to note that:
- 6.7. *"The existing balance will be affected, however, with the approved construction of the new southern section of Newgate Lane, which will provide a new connection from Newgate Lane to Peel Common Roundabout and a junction and link road to access the existing route of Newgate Lane. The road alignment just clips the extreme south-western corner of area 8.1b [sports pitches] but cuts right through the middle of the southern half of area 8.1a and will inevitably introduce further activity, noise and urbanising features into the agricultural landscape, as well as resulting in physical disturbance to land and tree/vegetation cover."*
- 6.8. With the relief road now complete (with mitigation planting still at a relatively young age and phase of establishment) the retained landscape to the east of the relief road is consequently smaller scale, and partly severed by the highway corridor.

⁵ Fareham Landscape Assessment (LDA Design on behalf of Fareham Borough Council, 2017)

-
- 6.9. In relation to the visual environment the FLA guidance states that:
- 6.10. *"Overall, visual sensitivity in this area is moderate to high. Although it is screened from longer-distance views, a large proportion of area 8.1a is highly visible from short distance views from Newgate Lane to the west, and it is overlooked by a number of properties around its periphery through or over boundary vegetation. The high intervisibility within the area means that these views are quite extensive across the area and they generally have an attractive, unspoilt rural character."*
- 6.11. The FLA guidance notes that the relief road will exacerbate the extent of visibility. The road itself has become an urbanising feature (particularly due to the larger scale noise attenuation barrier) and forms a detracting feature in the local landscape. Furthermore, the relief road has reduced the perception of "high intervisibility" across this parcel of land, as the associated infrastructure has either screened or disrupted views across the agricultural landscape between Newgate Lane and the nearby settlement edges.

Plate 4: FLA extract (page 151) showing landscape types for LCA8



- 6.12. The structure of the landscape of 08.1a and 08.2a is defined predominantly as 'weak structure' or 'fringe character' with just a small part of 08.1a that is defined as 'strong structure' which is concurrent with parts of the southern site (refer to **Plate 4**).
- 6.13. Given the weak structure generally, along with the noted influence of the adjacent urban environment, it is not clear as to why the FLA concludes such a high level of sensitivity for this part of the landscape. Furthermore, whilst Newgate Lane East is noted in the FLA, this route has not been constructed and its severance to the landscape, along with its infrastructure within the landscape, are influential.
- 6.14. Consequently, although this part of the landscape will retain some degree of sensitivity, in relation to the existing and most recent baseline, the sensitivity judgements of the FLA are likely to be overstated.

- 6.15. Furthermore, the FLA does focus on very specific parcels of the landscape which carries a risk that the site is considered out of context from its surrounding environment and landscape context. Consequently, any judgements on the sensitivity of the site should not be restricted to the site, but should be placed in the localised context of its immediate environment. For example, the predominantly agricultural landscape of sub-area 08.1a is considered in the FLA to be high sensitivity, but outside of the agricultural pocket there are substantial urbanising features that influence sensitivity.
- 6.16. The FLA includes more detailed sections of the LCA and although these do not set out 'key characteristics' (over and above the 'essential characteristics' defined for the wider LCA) they do include a more detailed description, presented for each sub-area in relation to:
- the landscape resource (landscape character and quality);
 - the visual environment (views, visual features and viewers);
 - setting of the urban area (contribution to setting and settlement character); and
 - green infrastructure (contribution to green infrastructure).
- 6.17. Each also includes descriptions of sensitivity and development potential.
- 6.18. The descriptions are extensive, but a summary is presented in the format of addressing 'development criteria and enhancement opportunities'. This section states that the area is of 'high sensitivity' and refers to matters of coalescence and its 'generally unspoilt rural character'.
- 6.19. As noted, in itself this is a characteristic of the site if it existed in isolation, but this part of the landscape does not exist in isolation, nor is it experienced in isolation and the sense of the rural character is equally influenced by the settlement fringe and amenity land uses that are presented by the residential areas and nearby sports and playing fields. This will reduce landscape sensitivity for the site in its context.
- 6.20. Furthermore, this part of the landscape does (and will), however, remain distinct from the wider strategic gap between Fareham and Stubbington which, in landscape character terms, is a clearly distinct part of the landscape from the suburban fringes of Fareham and Peel Common.

Strategic Gap

- 6.21. This section considers the site in the context of the Fareham and Stubbington strategic gap.

- 6.22. A 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' was undertaken by Hampshire County Council on behalf of FBC and published in September 2020. The study undertook a technical review of the six proposed 'Areas of Special Landscape Quality' and two proposed strategic countryside gaps (including the Meon Gap and the Fareham and Stubbington Gap).
- 6.23. The study reiterates the Fareham Draft Local Plan 2036, stating that (page 5):
- 6.24. *"...Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities (page 27, Fareham Draft Local Plan 2036)"*
- 6.25. The executive summary makes two observations in respect of the Fareham to Stubbington Strategic Gap, stating that (following extracts from pages 6 and 7 of the study) (emphasis added):

*"The Fareham-Stubbington Strategic Gap is proposed for continued designation, also having strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence through continued and heavy pressure for Southern expansion of Fareham and Northern and Eastern expansion of Stubbington, but **it is considered that there are some opportunities for development to be accommodated within the landscape, without compromising the Strategic Gaps function...***

Possible adjustments to the Fareham-Stubbington Strategic Gap could be considered in the following locations:

- An **area to the South of Fareham**, and west of HMS Collingwood, **as some development in this area could be visually absorbed into the Gap without compromising the Gap function...**

It is also noted that the Newgate Lane Area (Newgate Lane West and East from Fareham to Peel Common Roundabout) has undergone a significant amount of change in the recent past."

- 6.26. This overview clearly indicates the potential for development to come forward in the strategic gap, identifies the broad location where this might be possible and

acknowledges the 'significant' change arising from Newgate Lane East and associated works.

6.27. Chapter 4 of the study sets out an overview of the Strategic Gaps, it states that (page 84, para 8):

6.28. *"The aim of the Fareham-Stubbington Gap is to avoid coalescence between the settlements of: Fareham and Bridgemary, with Stubbington and Lee-on-the-Solent."*

6.29. The study goes on to define a series of 'key features' within the Fareham to Stubbington Gap (page 96), which include:

- Open, predominantly arable farmland and horticulture with some glasshouses, a weak hedgerow structure and few trees (refer to **Figure 7, Viewpoint D**);
- The settlement edges are for the most part well screened by mature tree canopy, but there is some minor visual intrusion from Fareham, Stubbington and HMS Collingwood;
- A few scattered farmsteads/horticultural holdings and a mosaic of small fragments of open farmland and horse grazed pastures sandwiched between **Figure 7, Viewpoint C**);
- Large scale non-agricultural uses of business and airfield development at Solent Airport in Daedalus to the south (refer to **Figure 7, Viewpoint A**);
- Utilities of Peel Common Water Treatment Works enclosed from views by an earth bund and mature tree belt and Peel Common Solar Farm;
- Construction site of Stubbington Bypass, which will provide an east-west route through the gap that has not previously existed (refer to **Figure 7, Viewpoint D**);
- Urban fringe character of Peel Common residential area;
- Recently completed highway works to Newgate Lane and Peel Common Roundabout, with associated noise attenuation fencing and bus and cycle infrastructure (refer to **Figure 7, Viewpoint 7**).

6.30. In respect of the Fareham and Stubbington strategic gap, the study draws together key conclusions in respect of the primary and secondary measures. Several key conclusions are summarised as follows:

- Minimum and maximum distances of ca. 300m to 1.8m [sic] (assumed km);
- That Peel Common represents a 'false' settlement edge;

- Two areas of the gap have distances of 350m and 300m but that these distances are still perceived as a sense of separation between neighbouring settlements, partly due to presence of mature vegetation;
- These represent 'minimum' gaps (within the 'rule of thumb') but are not appropriate to become a standard dimension as they would be weak and at risk of being lost (i.e. they are acceptable, but not ideal) – furthermore they function due to the context of linking to wider sections of the gap either side;
- Moderate to large gap distances of ca. 600m to 1.8km are 'good' distances;
- Presence of urban land uses can correspond to loss of tranquillity and dark night skies as urban fringe characteristics 'creep into the gap';
- In terms of land uses, sports fields and recreation grounds on the fringes of urban settlements have the potential to bring urbanising influence;
- In comparison to the Meon Gap there is not the same level of GI resource, however measures could be taken to increase these through positive environmental management; and
- Mitigation will be required where there is considered to be capacity to absorb development.

6.31. Although the study appears to be comprehensive, the robustness of the overall conclusions should be considered.

6.32. The aims of the study include a review of the function of the strategic gaps in the Borough, but also to consider their boundaries. The study includes the necessary analysis to present a clear evidence base for amending boundaries in parts of the strategic gap. In relation to the edges of Fareham and Gosport, there is no recommendation to adjust the boundaries in this area, despite the findings of the study that:

- Some physical coalescence has already occurred;
- These are some of the narrowest parts of the gap, resulting in a 'minimum functioning gap, that is weak';
- Suburban edges and influences are often prominent, which reduces the effectiveness of the gap, including loss of tranquillity and presence of lighting;
- Recreational land uses are present in the form of several sports and recreation grounds and these are noted as an issue in terms of their 'visual appropriateness'; and

- The road network is such that there is no genuinely clear experience of a break between the settlement areas, particularly between Peel Common, Bridgemary and the southern edge of Fareham.
- 6.33. In relation to the landscape around the site, and particularly between Peel Common and Bridgemary, the trends are not likely to be reversed nor the strategic gap strengthened, particularly with Newgate Lane East now forming such a strong urbanising feature in the local landscape context. The result is now the continued inclusion of a part of the gap that is weak and under pressure in the long term.
- 6.34. In this context, it would be logical and appropriate for the study to conclude that the boundary of the strategic gap be amended to omit this part of the landscape, creating capacity for appropriate forms of development that could come forward with a strong framework of green infrastructure and mitigation, as is proposed for the site.
- 6.35. This would place an emphasis on the importance of the core, priority areas of the gap, between Fareham and Stubbington where the gap clearly delivers its role and function in full.
- 6.36. Having considered the analysis within the study analysis of the Fareham to Stubbington gap, the site (and landscape generally between Peel Common and Fareham/Gosport) is not considered to be a priority area that is required to maintain the integrity and function of the wider Fareham and Stubbington strategic gap.
- 6.37. The site is well placed to accommodate some form of development that could come forward that would not significantly affect the integrity of the gap and the physical and visual separation of settlements.

7. SUMMARY AND CONCLUSIONS

- 7.1. Pegasus Group has been jointly instructed by Miller Homes and Bargate Homes Ltd to undertake a Preliminary Landscape and Visual Appraisal (PLVA) in relation to land to the south of Fareham, Hampshire (referred to as 'the site'). The report has been prepared in support of representations being made to the Regulation 19 consultation on the Fareham Borough Council's publication version of the 'Fareham Local Plan 2037'.
- 7.2. The site comprises land to the south of Fareham, between Bridgemary (Gosport) to the east and Newgate Lane East, to the west. The site had previously formed a draft allocation for housing (HA2) as part of the former emerging local plan, however, has since been omitted from the publication version.
- 7.3. The wider landscape context of the appeal sites includes the low-lying ground of the coastal plain, characterised by abrupt the transition between the open landscapes and the adjacent urban environments of Fareham, Gosport (with Woodcot and Bridgemary). The settlement area of Stubbington forms the western extent of the Strategic Gap, extends across the coastal plain between the local settlement areas. Separation is most pronounced across the arable areas between Fareham/Peel Common and Stubbington.
- 7.4. This PLVA has been undertaken to determine the various landscape and visual constraints and opportunities regarding the site and its immediate landscape context.
- 7.5. These are subsequently considered in respect of the development potential for this part of the landscape, and how the constraints and opportunities might influence a strategic masterplan across the wider site area; the constraints and opportunities also identify the potential for an inherent landscape strategy as part of an emerging masterplan. The PLVA also makes reference to the contribution of the site to the Fareman and Stubbington strategic gap.
- 7.6. The PLVA adopts a 'landscape and visually led' approach, setting principles for high level design inputs to the masterplan that relate to the local landscape. Consequently, the PLVA has identified several high-level design objectives as part of an initial landscape strategy which can be adopted as more detailed site masterplanning progresses.
- 7.7. In summary the site sits within a variable pocket of landscape. In isolation the site comprises remnant agricultural enclosures however it cannot be separated from the extensive urbanising influences which surround and frame it, particularly in the context

of the more recent severance of the agricultural land that has arisen from the route of the bypass (Newgate Lane East East).

- 7.8. Consequently, the condition of the landscape is mixed. Furthermore, with a lack of formal public access, there are few opportunities to experience the more positive aspects of the landscape, other than from limited locations on the residential or amenity context adjacent to the site, and not within it.
- 7.9. Overall the value, susceptibility and sensitivity of the site are influenced by these matters, contributing to some potential capacity to accommodate development, but also highlighting that if there is development potential, there are also some landscape components that present 'inherent' sensitivities that can be addressed through a comprehensive and considered approach to mitigation.
- 7.10. In terms of any potential landscape and visual impacts, there are likely to be limited to site level in landscape terms, and relate to the site in its local landscape context in terms of landscape character and/or visual receptors.
- 7.11. In respect of landscape impacts, the loss of the agricultural enclosures and replacement of these areas with residential development are largely anticipated to be the primary causes of impact, however this is balanced by the response to the grain and pattern of the landscape and its scale through definition of development envelopes, as well as the response to the characteristics of the landscape in terms of retaining hedgerows, trees and woodland tree belts (where appropriate). Where these are referenced, inherent mitigation adopts an approach of retention and/or enhancement wherever possible.
- 7.12. Overall, views of the site, and likely views of the potential development, are restricted to a very limited area, including the boundaries of the site itself (noting that there is no formal public access across the site) and from locations in the immediate context of the site.
- 7.13. Further mitigation, in the form of native landscape planting and enhanced boundary vegetation can also be integrated into a scheme to further reduce impacts, notably from the existing nearby public footpaths and open spaces to the north and south, from adjacent residential areas and from the surrounding local road network.
- 7.14. In the context of delivering housing, and the associated need for using greenfield sites to deliver the housing within the plan period, there will be an inherent degree of landscape and visual impacts for most, if not all, proposed and emerging sites. What

remains is to identify sites that can deliver housing whilst avoiding or minimising impacts and whilst respecting landscape and visual amenity.

7.15. Consequently, the potential for development on the site is considered to be acceptable in landscape and visual terms and that a masterplan for residential development can come forward that incorporates a successful landscape mitigation strategy as an inherent part of the scheme.

7.16. In terms of the Fareham and Stubbington strategic gap, the site (along with its local landscape context), is well placed to accommodate some form of development without undue consequences or impacts on the role and function of the Strategic Gap as a whole. This is on the basis that:

- A substantial distance will be retained across the wider gap, between the site and Stubbington;
- In terms of visibility, the site is physically and visually well contained, placed as the area is within a strong framework of green infrastructure and the settlement edge – furthermore, the site (and potential development) will not be visible across the gap from Stubbington;
- The surrounding context and urbanising influences, including the residential areas of Peel Common, Bridgemary and Woodcot which reduce the degree of change as they provide a relevant settlement edge context;
- The opportunity to contribute to, and maintain, a strong green infrastructure network and facilitate a strategic green infrastructure connection through the area that will reinforce and connect the linear routes which cross broadly north to south through this area; and
- In connection with the green infrastructure provision, the ability to incorporate substantial mitigation that will successfully avoid or minimise landscape and visual effects.

7.17. This is broadly consistent with the evidence base in respect of the strategic gap which acknowledges that the gap is not synonymous with landscape condition, quality or value and that the strategic gap can accommodate some form of growth and development within it. In this context the evidence base also recognises the need for additional, more detailed assessment on a site/project basis, which this PLVA forms part of.

FIGURES



KEY



Site boundary



New bypass

Note:

Available aerial imagery from OS not yet updated to show the actual road as constructed

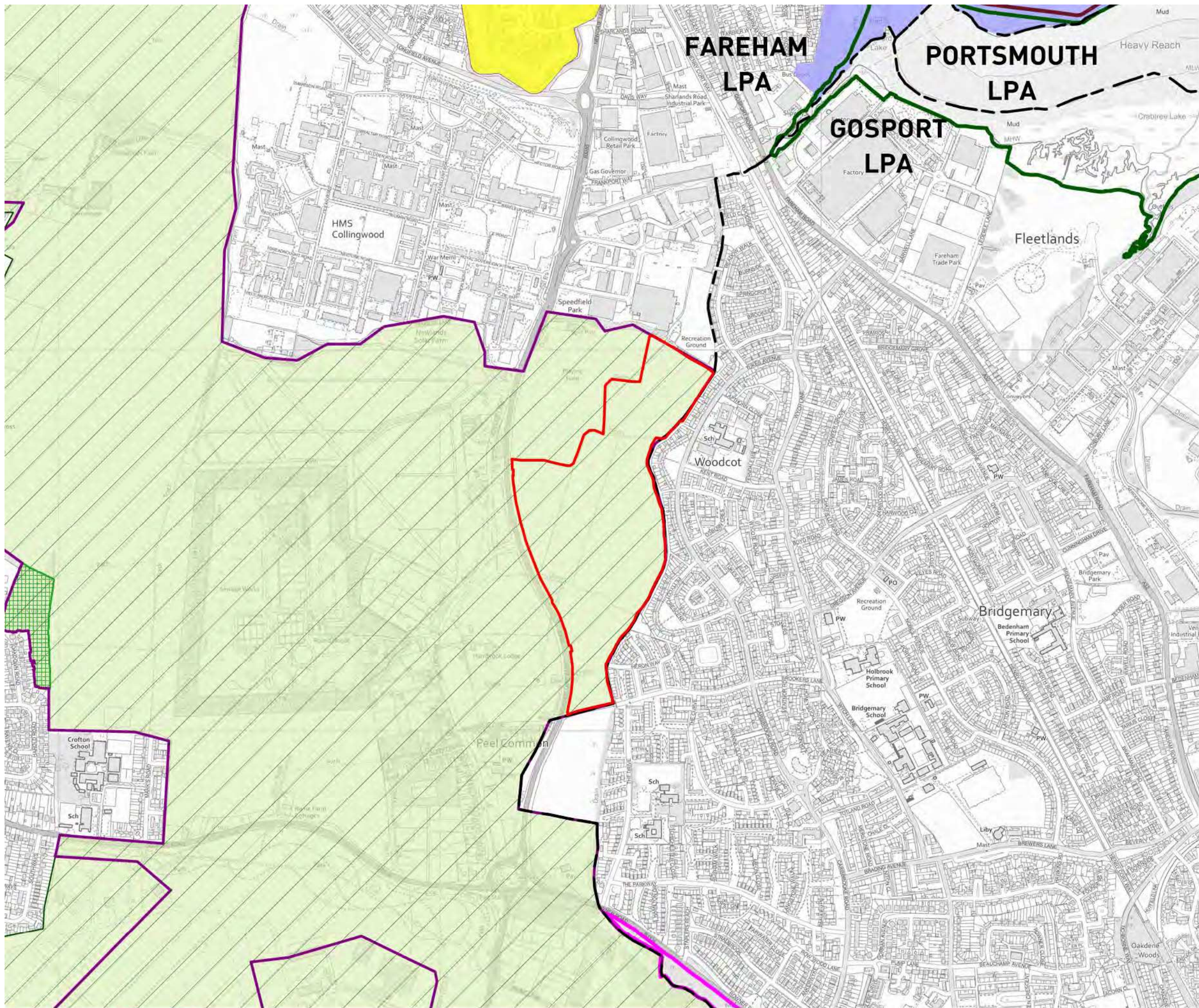
Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

Fig. 1: Site Location

Drawing no. : P20-3363_01
Date : 07/12/2020
Drawn by : NF
Checked by : JWA
Scale : 1 : 5000 @ A3





KEY

-  Site boundary
-  LPA boundary***
-  Areas of Special Landscape Quality (DS3)**
-  Countryside (CS6, CS14)*
-  Strategic Gap (CS22)*
-  Strategic Gap (DS2)**
-  Ancient Woodland***
-  Country Parks and Gardens***
-  Cams Hall Conservation Area Boundary*
-  SSSI***
-  Scheduled Monuments***

Sources:

- * Fareham Borough Local Plan Part 2 (adopted June 2015)
- ** Fareham Borough Local Plan 2037 Publication Plan (consultation Nov-Dec 2020)
- *** www.magic.gov.uk

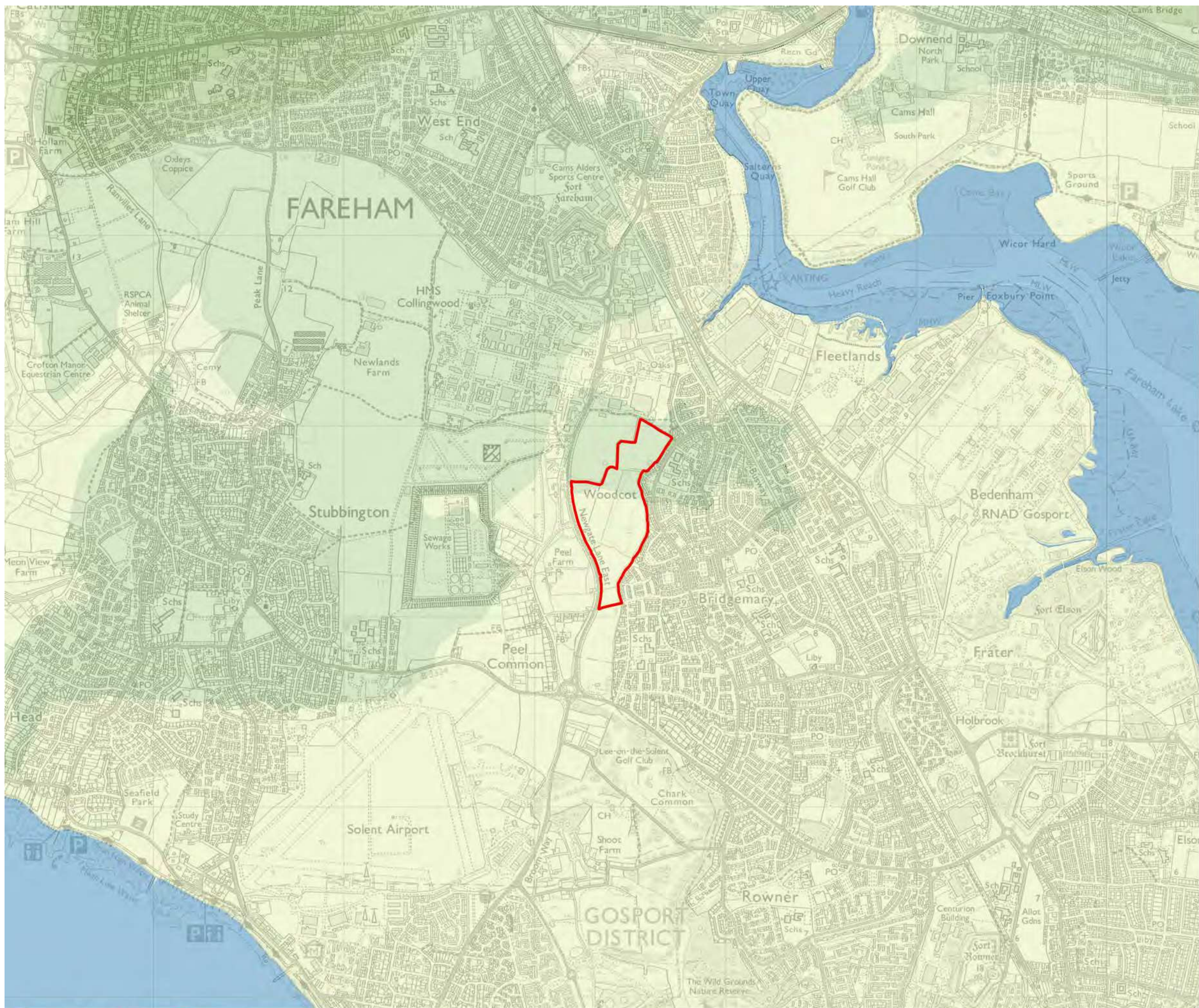
Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES







Fig. 2: Site Context and Planning Designations

Drawing no. : P20-3363_02
 Date : 07/12/2020
 Drawn by : CLW
 Checked by : JWA
 Scale : 1 : 10000 @ A3





KEY

-  Site boundary
-  50 - 60m AOD
-  40 - 50m AOD
-  30 - 40m AOD
-  20 - 30m AOD
-  10 - 20m AOD
-  0 - 10m AOD
-  Waterbody

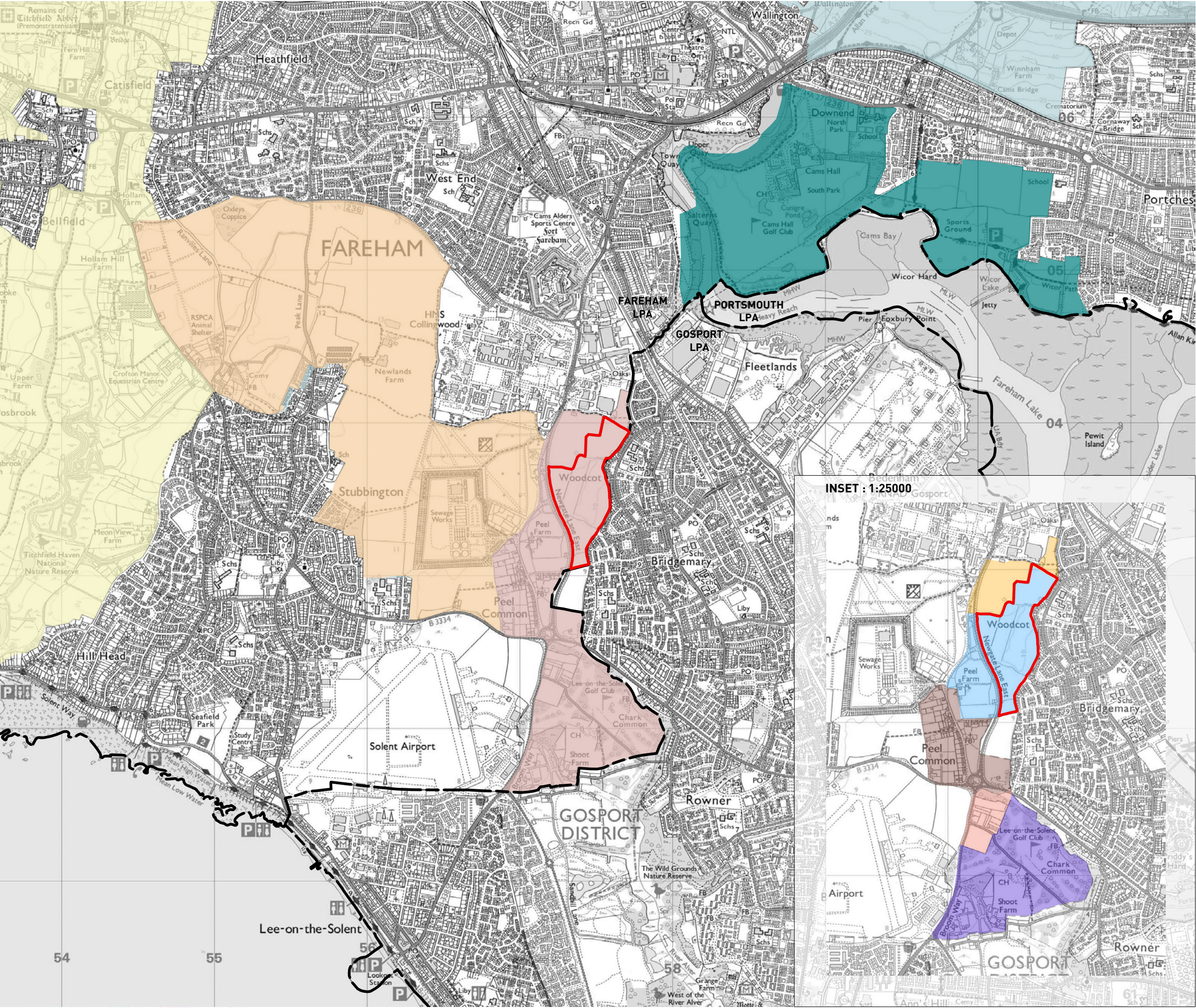
Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

Fig. 3: Topography

Drawing no. : P20-3363_03
 Date : 07/12/2020
 Drawn by : NF
 Checked by : JWA
 Scale : 1 : 20000 @ A3





KEY

- Site boundary
- LPA boundary

National Character Area
The whole study area is located within the
NCA 126: South Coast Plain

**Fareham Landscape Assessment:
Landscape Character Areas**

- 4 Chilling/Brownwich Coastal Plain
- 5 Titchfield Corridor
- 6 Meon Valley
- 7 Fareham/Stubbington Gap
- 8 Woodcot/Alver Valley
- 11 Portsdown
- 12 Cams/Wicor Coastal Fringe

INSET KEY

**Fareham Landscape Assessment:
LCA 8: Woodcot-Alver Valley - Sub Areas**

- 08.1a
- 08.1b
- 08.2a
- 08.2b
- 08.2c

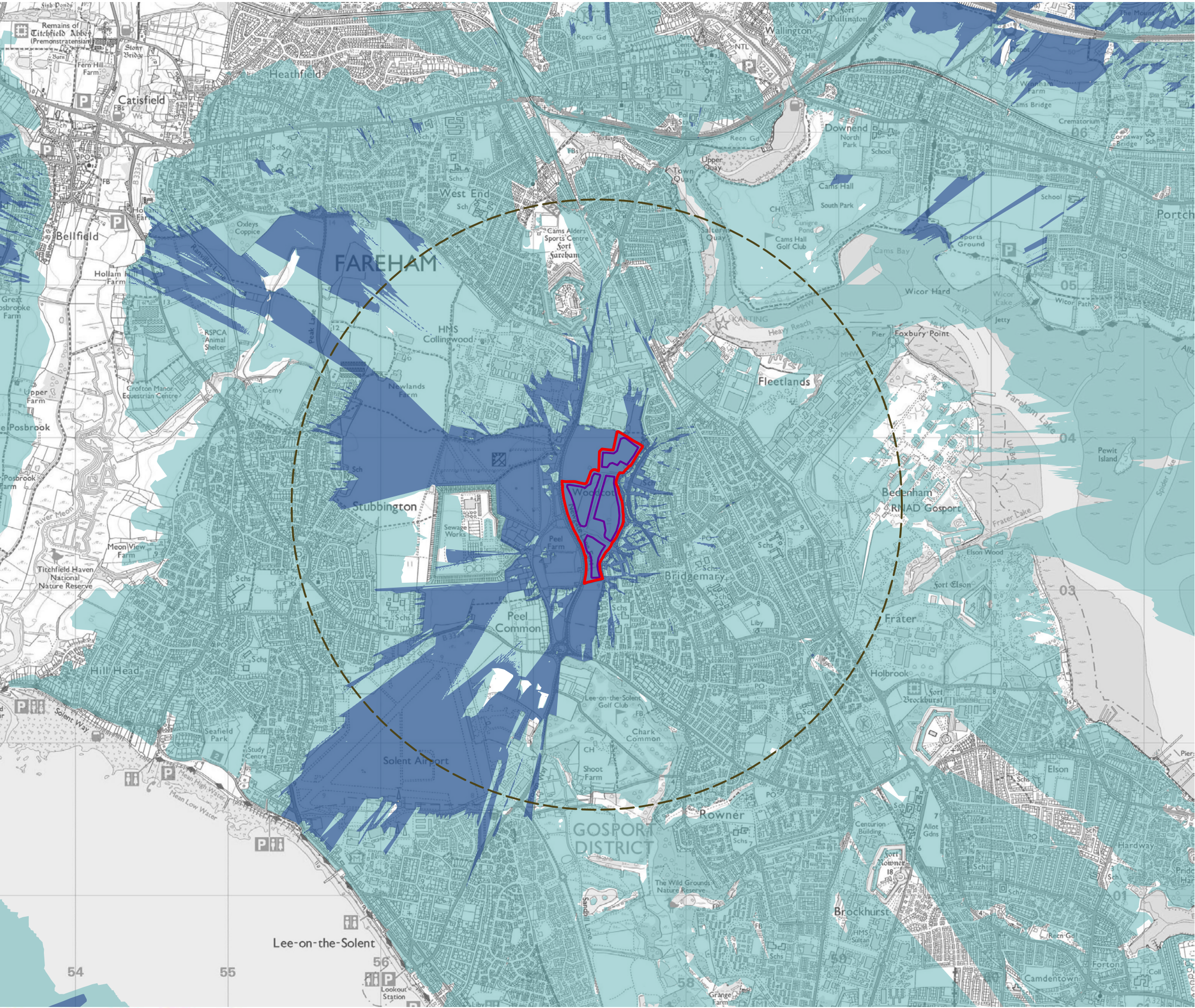
Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

**Fig. 4: Borough Landscape
Character**

Drawing no. : P20-3363_04
Date : 07/12/2020
Drawn by : NF
Checked by : JWA
Scale : 1 : 25000 @ A3





KEY

Site boundary

Development envelope

2km radius

Bare Earth Zone of Theoretical Visibility
- 11m

Screened Zone of Theoretical Visibility
- 11m

ZTV Production Information -
- DTM data used in calculations is OS Terrain 5
- Calculations based on a bare earth survey
- Viewer height set at 1.7m
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development will be visible from, assuming 100% visibility. It is generated using terrain data only and does not account for screening that vegetation or the built environment may provide. It is, as such, 'a worst case' ZTV and the actual extents of visibility are likely to be less extensive.

Screened ZTV Production Information -
- DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).

- Indicative Woodland and Building heights are modelled at 15m and 8m respectively
- Viewer height set at 1.7m
- Calculations include earth curvature and light refraction

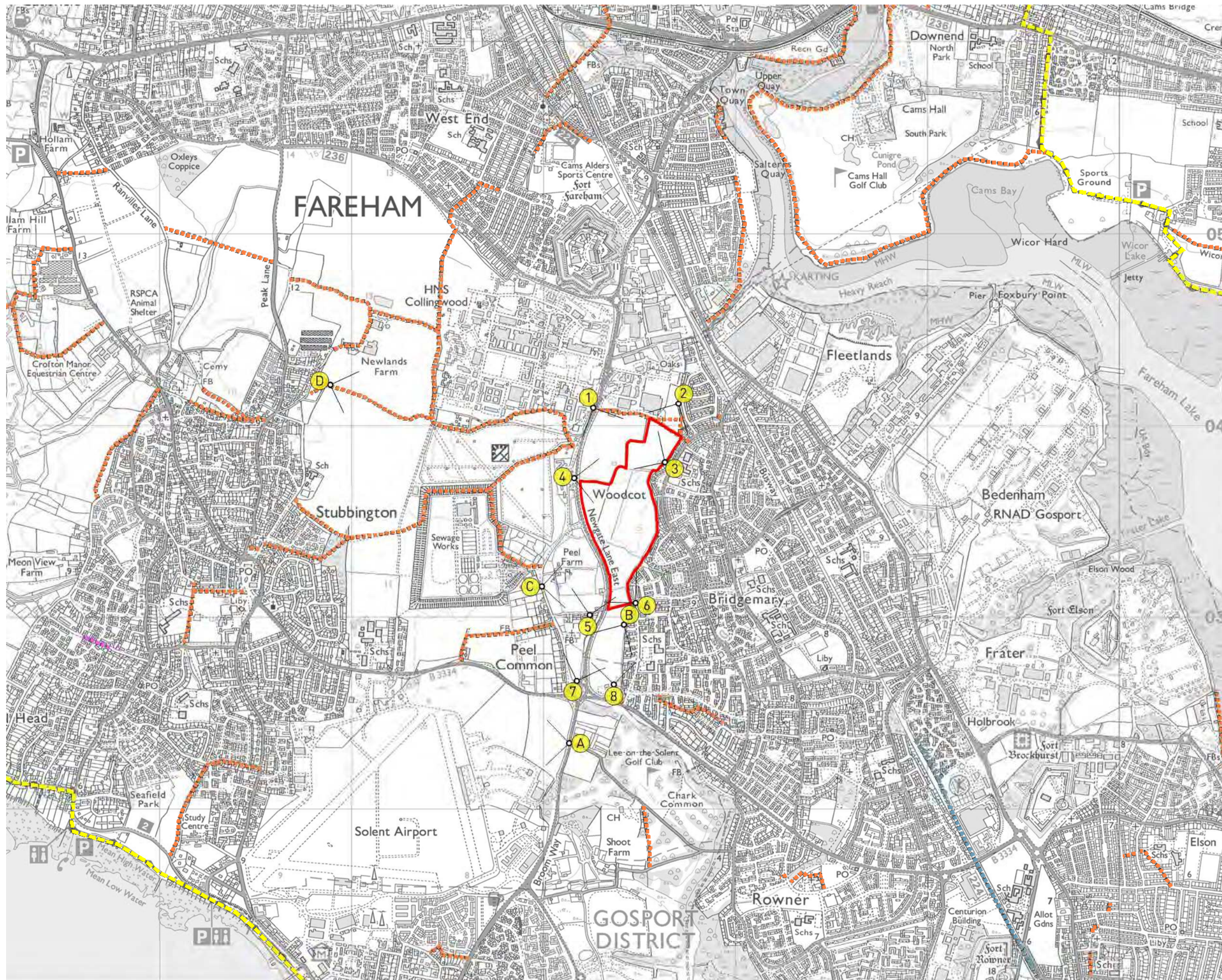
N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development will be visible from, assuming 100% visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

Note: Development Envelope based on 'Concept Masterplan'

Newgate Lane South
Client: MILLER HOMES & BARGATE HOMES
Fig. 5: Zone of Theoretical Visibility

Drawing no. : P20-3363_05
Date : 07/12/2020
Drawn by : CLW
Checked by : JWA
Scale : 1 : 25000 @ A3

Pegasus Group



Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

Fig. 6: Viewpoint Locations and Public Rights of Way

Drawing no. : P20-3363_06
 Date : 07/12/2020
 Drawn by : CLW
 Checked by : DRAFT
 Scale : 1 : 20000 @ A3



Viewpoint 1 | View looking south-east, from Newgate Lane on the edge of Fareham, overlooking the amenity sports pitches associated with HMS Collingwood.



Viewpoint 2 | View looking south, from Tukes Avenue open space, illustrating the heavily vegetated northern boundary of the site.

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





Viewpoint 3 | View looking west, from a field access gate off Tukes Avenue, illustrating the containment and degraded condition of parts of the landscape parcel.



Viewpoint 4 | View looking east, from Newgate Lane illustrating more direct views across the core agricultural areas of the site, with the settlement edge of Gosport forming the backdrop.

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





Viewpoint 5 | View looking north-east, from Newgate Lane East, considering the western edge of the site along with the influence of the highways infrastructure of Newgate Lane East.



Viewpoint 6 | View looking north-west, from Brookers Lane and the potential access point to this part of the site.

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





Viewpoint 7 | View looking north, from Newgate Lane East, illustrating the direction of view toward the site at this 'gateway' and the influence of noise mitigation along the highway.



Viewpoint 8 | View looking north, from Brookers Field recreation ground, illustrating views to the southern parts of the site from the recreational open space and the screening vegetation present along Brookers Lane.

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





Viewpoint A	View looking west, from Broom Way, illustrating the nature of the ongoing airfield development.
-------------	---



Viewpoint B	View looing south-west, from Brookers Field recreation ground, illustrating the amenity character of the playing fields in the urban fringe context.
-------------	--

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





Viewpoint C | View looking east, from Newgate Lane, illustrating the variation of agricultural land uses along with the intervisibility with the urban edge of Gosport.



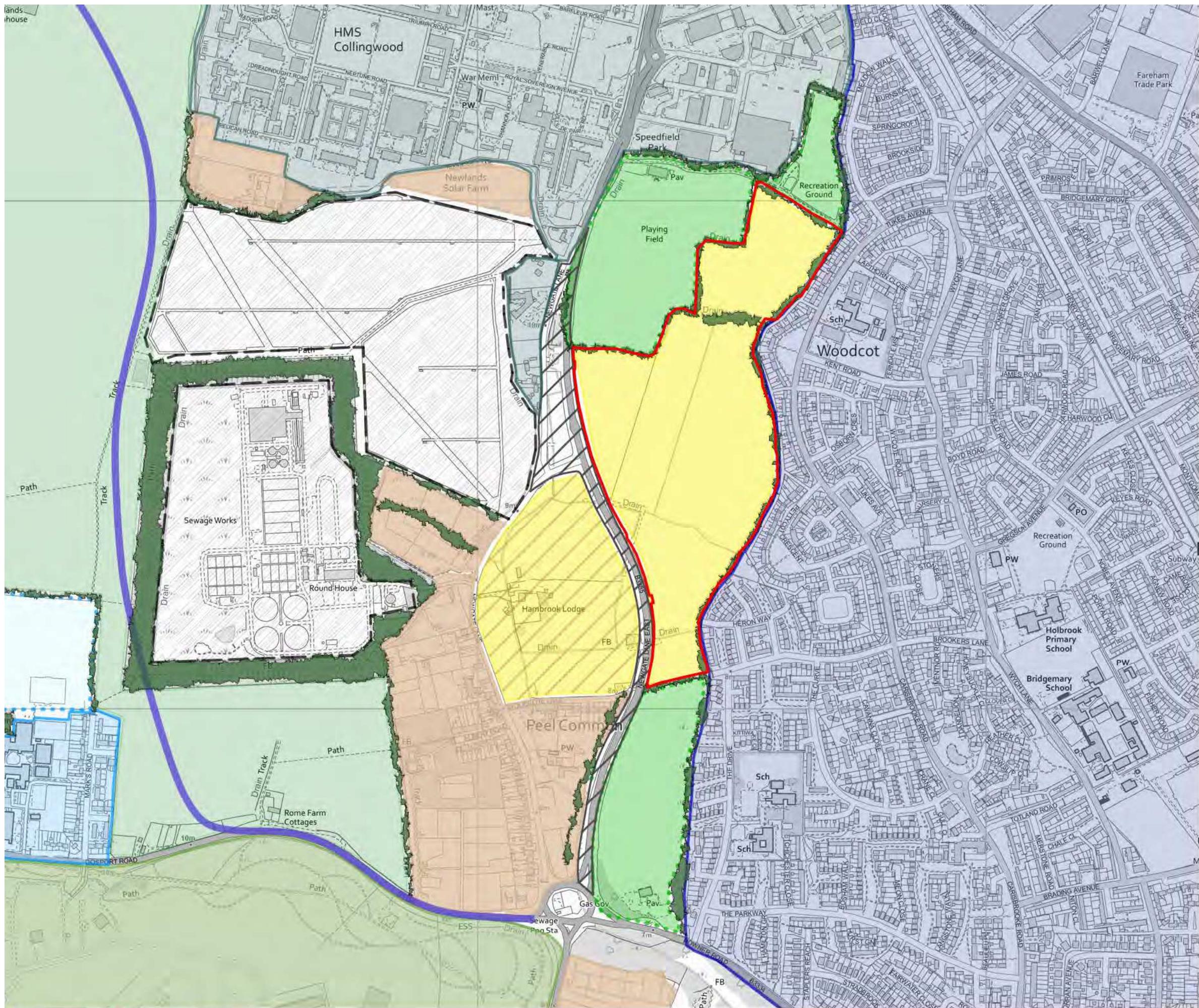
Viewpoint D | View looking east, from the public footpath north of Stubbington, illustrating the more pronounced separation of the arable land between Stubbington and Fareham.

Newgate Lane South

Fig. 7: Viewpoint Photographs

Drawing Ref: **P20-3363_07**
 Client: **Miller Homes & Bargate Homes**
 Date : 16/12/20
 Drawn by : NF
 Checked by : DRAFT





KEY



Site boundary



Existing agriculture



Existing agriculture/ potential settlement extension



Urban edge of Stubbington strongly defined by green infrastructure



Existing settlement edge of Woodcot defined by thin, linear green infrastructure



Wayside/ incidental development



Amenity landscape



Existing area of Peel Common within strategic gap



Large scale solar site



Open landscape of the airfield in development



Structural vegetation forming distinct features and boundaries



Stubbington bypass (in construction)



Western area of strategic gap comprising arable landscape of an open character



Highways infrastructure

Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

Fig. 8: Landscape and Visual Analysis

Drawing no. : P20-3363_08

Date : 09/12/2020

Drawn by : NF/CLW

Checked by : JWA

Scale : 1 : 7500 @ A3





- KEY**
-  Site boundary
 -  Potential development parcels
 -  Existing green infrastructure retained and enhanced
 -  Strategic green infrastructure link
 -  Landscape buffers/corridors
 -  Potential links to adjacent open spaces
 -  Central open space

Newgate Lane South

Client: MILLER HOMES & BARGATE HOMES

Fig. 9: Landscape and Visual Strategy

Drawing no. : P20-3363_09
 Date : 10/12/2020
 Drawn by : CLW
 Checked by : JWA
 Scale : 1 : 5000 @ A3



Site:	HA2
Client:	Bargate Homes and Miller Homes
Job Number:	A097690-2
File Location:	I:\Projects\Projects 097000 on\A097690-2 Newgate Lane East\REPORTS

Introduction

This Technical Note has been prepared to provide support in relation to Ecology to representations to the Fareham Borough Local Plan for the former strategic housing allocation HA2 Newgate Lane South.

This comprises the following three sites within the Strategic Housing and Employment Land Availability Assessment (SHELAA) prepared by Fareham Borough Council:

- Copps Field, Newgate Lane, Peel Common (3028);
- Land East of Newgate Lane, Peel Common (3057); and
- Land East of Newgate Lane East, Peel Common (3002).

The SHELAA includes comments in relation to Ecology and reasons for discounting the sites. For all three sites, the Ecology comments include the following:

"The site is a Brent Geese and Solent Waders 'Low Use' site. All such sites have the potential to support the existing network and provide alternative options and resilience for the future network. Therefore proportionate mitigation, off-setting and/or enhancement measures will be required. Natural England should be consulted."

For Copps Field, it is also stated that:

"The hedgerows on site should be retained and protected by a planted buffer. Due to the presence of suitable habitats on site, it is likely that reptiles, Badgers, Water Voles, amphibians, Dormice and bats are present on site."

For Land East of Newgate Lane it is stated that there is:

"Potential for badger, bat, reptile and green sandpiper."

All three sites share the same reasons for discounting, one of which relates to Ecology. This states that:

"Site is designated as a Brent Geese and Solent Waders Low Use site and there is no evidence of a strategy compliant solution."

Proposed Sites

Land East of Newgate Lane East, Peel Common (3002)

Land East of Newgate Lane East is currently the subject of an outline planning application P/19/1260/OA. As part of this application, a Wader and Brent Goose Mitigation Strategy has been devised by WYG and submitted to Fareham Borough Council and assessed as part of a Report to Inform Habitats Regulations Assessment Stage 1 and Stage 2 prepared on behalf of the applicants. This involves the creation of a mitigation area at Land West of Old Street, Stubbington and is designed to deliver mitigation for a further two sites currently the subject of appeals (Land at Newgate Lane North and Land at Newgate Lane South).

Although this has not yet been formally assessed by Fareham Borough Council through their Appropriate Assessment for P/19/1260/OA, the strategy has been reviewed by the Council's Ecologist for the two appeal sites and is agreed as part of the relevant Statements of Common Ground. Therefore, it is reasonable to conclude that this represents a 'strategy compliant solution' and as such this should not represent a reason to discount the site.

Copps Field (3028) and Land East of Newgate Lane (3057)

These two sites are not covered by the mitigation strategy discussed above, however; the presence of this strategy demonstrates that there are suitable opportunities to deliver mitigation.

The reasons for discounting refer to a 'strategy compliant solution', this in relation to the Solent Waders and Brent Goose Strategy (SWBGS). Under the SWBGS, mitigation for the loss of Low Use sites (such as F15 which is covered by HA2) comprises compensatory funding to be used to maintain and enhance the network. The intention of this approach is for funding to be managed by the Local Authority to support schemes across the network, including within neighbouring authorities. In Fareham Borough, there is no scheme or schemes towards which the authority can direct this funding. Where no strategic approach is available, then it is necessary for a suitable mitigation solution to be provided by the applicant. This is confirmed by Natural England's written statement in respect of the above appeals. According to Policy NE5 of the Fareham Local Plan for Low Use sites:

"For development proposals of all kinds, proportionate mitigation, enhancement and/or offsetting will be required. Measures should avoid and/or adequately mitigate the impact of development on site in the first instance. However, where it is demonstrated that this is not practical or feasible, off-site options and / or a financial contribution for mitigation should be considered."

In the case of each of these sites, on site mitigation is not possible (as any areas of open space retained would be unsuitable for waders and brent geese due to the reduces size and proximity of new development). Therefore, a suitable off-site mitigation solution, such as that proposed for Land East of Newgate Lane East, would be policy compliant. In addition to a scheme such as this, we are also aware of other opportunities for mitigation which are likely to be practical during the new plan period. Following discussions with Hampshire and Isle of Wight Wildlife Trust and Hampshire County Council, both bodies are in the process of identifying suitable sites which could be funded by mitigation payments under Policy NE5. Hampshire County Council already own large areas of suitable land within the wader and brent goose network, and the Wildlife Trust are considering acquiring land in a similar manner to their approach to providing mitigation for nitrogen outputs.

Policy NE5 is taken into account as mitigation within the Fareham Local Plan HRA prepared by Urban Edge Consultants which concludes that there will be no adverse effect on the integrity of the Solent and Southampton Water SPA or Portsmouth Harbour SPA (alone or in combination) as a result of site specific impacts (which includes loss of SWBGS sites). It can therefore be concluded that provided any development of these two sites is compliant with Policy NE5 (which it must be in order to be granted consent) there will be no impact on the integrity of the associated European sites or the wader and brent goose network. Given the presence of this policy, it is unreasonable to dismiss the sites on these grounds, or to require detailed mitigation at the plan stage (when Policy NE5 provides sufficient security).

It should also be noted that two proposed allocations within the Local Plan (employment allocations 3113 Farady Business Park and 3114 Swordfish Business Park) are incorrectly stated to have no constraints within the SHELAA. In fact, both these sites lie within a Low Use site (F13) and would also result in an adverse effect. Neither allocation is supported by a site-specific or detailed mitigation strategy and in the Local Plan HRA it is stated that mitigation for these allocations will be meeting the requirements of Policy NE5. On the grounds of consistency, either these two allocations should also be discounted, or a requirement to comply with Policy NE5 should be acceptable for all sites which affect Low Use sites.

Local Plan Policies

As requested, a review has also been undertaken of the proposed Natural Environment policies within the Local Plan relevant to our area of expertise. This includes Policies NE1 – NE5. These are summarised below along with a brief commentary in relation to the HA2 sites.

Policy	Description	Comments
NE1	Protection of Nature Conservation, Biodiversity and the Local Ecological Network	This policy relates to the protection of designated sites which is included within previous plans. It adds protection of the Ecological Network. The Local Ecological Network Map identifies 3028 as a 'Network Opportunity', which means it has been identified as an area which could be improved or managed to achieve measured biodiversity net gain (see NE2). None of the sites within HA2 comprise statutory or non-statutory designated sites.
NE2	Biodiversity Net Gain	This requires 10% gains in biodiversity for all sites and is in line with forthcoming government requirements. It is likely that this requirement can be achieved for HA2 (it has been demonstrated for 3002 in the submission) as a whole.
NE3	Recreational Disturbance on the Solent Special Protection Areas (SPAs)	This policy requires a financial contribution to mitigate recreational disturbance and is consistent with previous local plan policy.

NE4	Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent.	This requires the production of nutrient budgets and delivery of suitable mitigation to make sure that developments result in a net reduction in nitrogen outputs.
NE5	Solent Wader and Brent Goose Sites	<p>Discussed above, this policy requires mitigation where there will be impacts on the wader and brent goose network. Mitigation is proposed for 3002 and suitable mitigation in compliance with NE5 will be required for 3028 and 3057 at the application stage.</p> <p>In Para 9.74, it states that '<i>off-site options and / or a financial contribution</i>' are suitable for mitigation, however it then only goes on to discuss financial contributions. In the absence of clear identification of where contributions will be applied, the policy wording should be made clearer that bespoke mitigation solutions which do not result in such payments are also acceptable (where they satisfy the requirements of the Habitats Regulations).</p>



David West CEnv MCIEEM

Associate Ecologist

Technical Note

Project No: ITB10353
Project Title: Land East of Newgate Lane, Fareham
Title: Transport Delivery - Draft Local Plan 2037
Ref: TW/ITB10535-005A
Date: 17 December 2020

SECTION 1 INTRODUCTION AND CONTEXT

- 1.1 Miller Homes, Bargate Homes and the Hammond Family are jointly promoting Land East of Newgate Lane for development. The site has potential to deliver some 515 dwellings.
- 1.2 The site was previously identified for allocation under emerging Housing Allocation Policy HA2 of the draft Local Plan 2036 for around 475 dwellings. Despite FBC previously considering the site suitable for development, FBC has more recently published its draft Regulation 19 Local Plan which omits the site and Policy HA2, primarily as a result of FBC now proposing a lower housing number.
- 1.3 This Technical Note (TN) has been prepared to demonstrate how the site can be delivered in transport terms, with particular reference to the NPPF transport tests outlined at Paragraphs 108 and 109, which together requires that development proposals ensure that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 1.4 The earlier draft Policy HA2 for the site (**Appendix A**) identified various site specific requirements in relation to transport that were needed to ensure satisfactory development of the site:

c) Primary highway access shall be focused on Newgate Lane South in the first instance, with Brookers Lane having the potential to provide secondary access for a limited number of dwellings

e) The provision of pedestrian and cycle connectivity between adjoining parcels as identified by the Development Framework, as well as safe pedestrian/ cycle crossing points of Newgate Lane South, safe and accessible walking/ cycling routes to local schools, open spaces and nearby facilities in Woodcot/Bridgemary

f) The provision of vehicular highway access between individual development parcels, as identified by the Development Framework, without prejudice to adjacent land in accordance with Policy D4

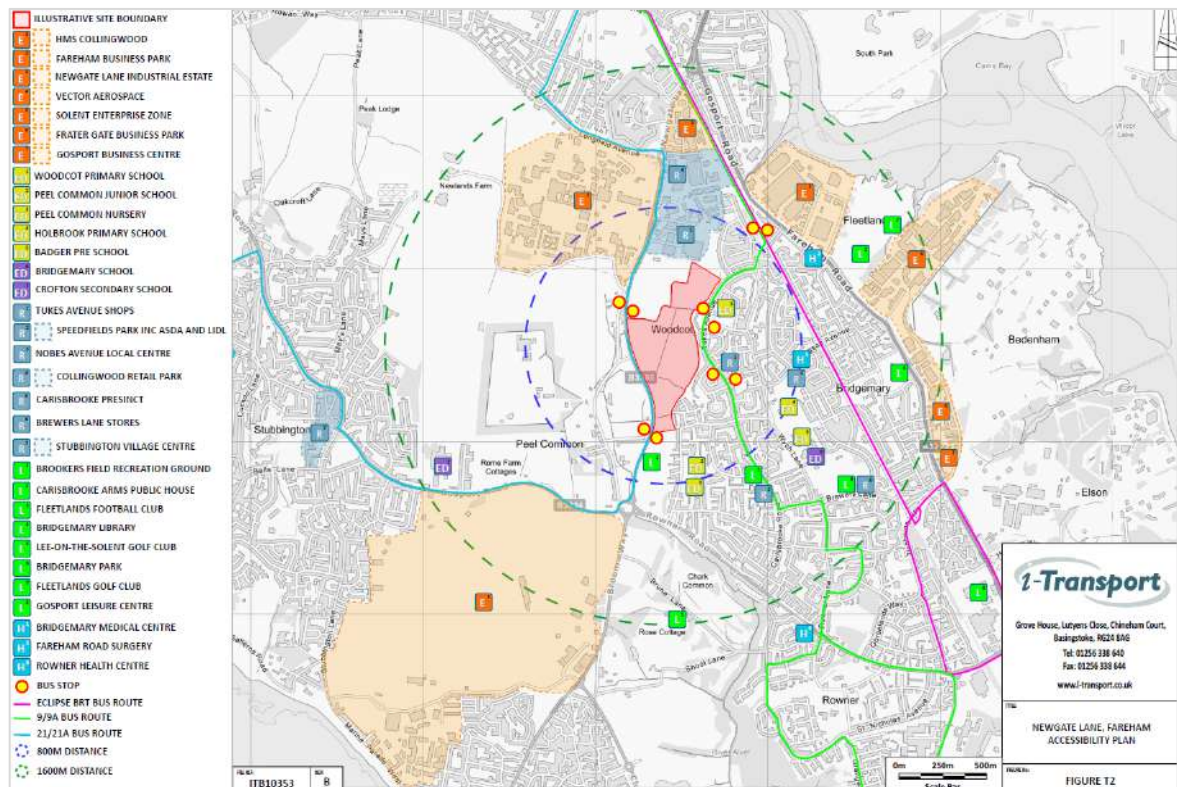
- 1.5 As part of its consultation on the Draft Local Plan 2037, FBC has produced various evidence base documents on transport matters. The following documents are considered in this document:
- i Infrastructure Delivery Plan (September 2020)
 - ii Local Plan Strategic Transport Assessment (September 2020)
 - iii Fareham Local Plan - SRTM Modelling Report (August 2020)
 - iv Strategic Transport Assessment 'Do Something' Local Junction Modelling Report (Sept 2020)
- 1.6 At the outset it is worth noting that the FBC transport evidence base was substantially prepared before FBC amended its spatial strategy approach (to remove various draft allocations including HA2 and the SGAs), and so all of the traffic modelling and transport appraisal work that it presents to support the draft Local Plan includes development on the Land East of Newgate Lane site (HA2), and also includes the development of the two SGAs that were proposed in the Local Plan Supplement.
- 1.7 In this regard, the traffic impacts of the site are appraised in the Council's transport evidence base which leads the Council to conclude in its Strategic Transport Assessment that:

"The quantum and distribution of the development proposed in the Fareham Local Plan, and the resulting transport impacts, are capable of mitigation at the strategic level, and that the plan is therefore deliverable and sound from a transport perspective. (STA 2020 – 14.16)"

SECTION 2 PROMOTING SUSTAINABLE TRANSPORT

- 2.1 The FBC Sustainability Appraisal (Nov 2020) identifies that the site (SA sites 3002, 3028, 3057, 3133) falls within 7 accessibility zones relative to local facilities. It presents a 'neutral' rating for the site.
- 2.2 This assessment omits the proximity of the site to major employment areas (both Fareham Business Park and Newgate Lane Industrial Estate fall within the accessibility criteria, as would part of the Solent EZ), and the clear potential / expectation through the scale of the development to deliver on site equipped play areas. Additionally, there are café uses in both Asda and McDonalds a short distance north of the site, all within the accessibility criteria.
- 2.3 Therefore, the sites should instead be assessed as meeting 10 of the 12 accessibility criteria, which should be assessed as a **positive** impact rather than neutral when considered against SA Objective 4. The site represents a sustainable location for development.
- 2.4 On a more practical level, **Image 2.1** demonstrates in spatial terms that the site is very well located to many everyday services, accessible by a comfortable walk or a short cycle trip and well located to public transport facilities.

Image 2.1 – Accessibility to Facilities and Services –



2.5 To ensure opportunities for sustainable travel to local facilities are delivered, the access strategy proposes various connections to the local network:

- **Access to Newgate Lane** – two connections across Newgate Lane are proposed, at Brookers Lane and at the Primary Site access, to connect to the Old Newgate Lane.
- **Access to Bridgemary** – Connections for pedestrians and cyclists are proposed at Brookers Lane and at various locations to Tukes Avenue for onward movement to Bridgemary.
- **Access to Rights of Way** – Connections to Public Footpath 76 routing to the north of the site and to Brookers Lane / Woodcote Lane to the south of the site are to be provided. This connects with the existing crossing facilities of Newgate Lane South.

2.6 **Image 2.2** presents the Concept Masterplan (**Appendix B**) for the development of the site which demonstrates the proposed pedestrian and cycle connectivity and integration to the local area.

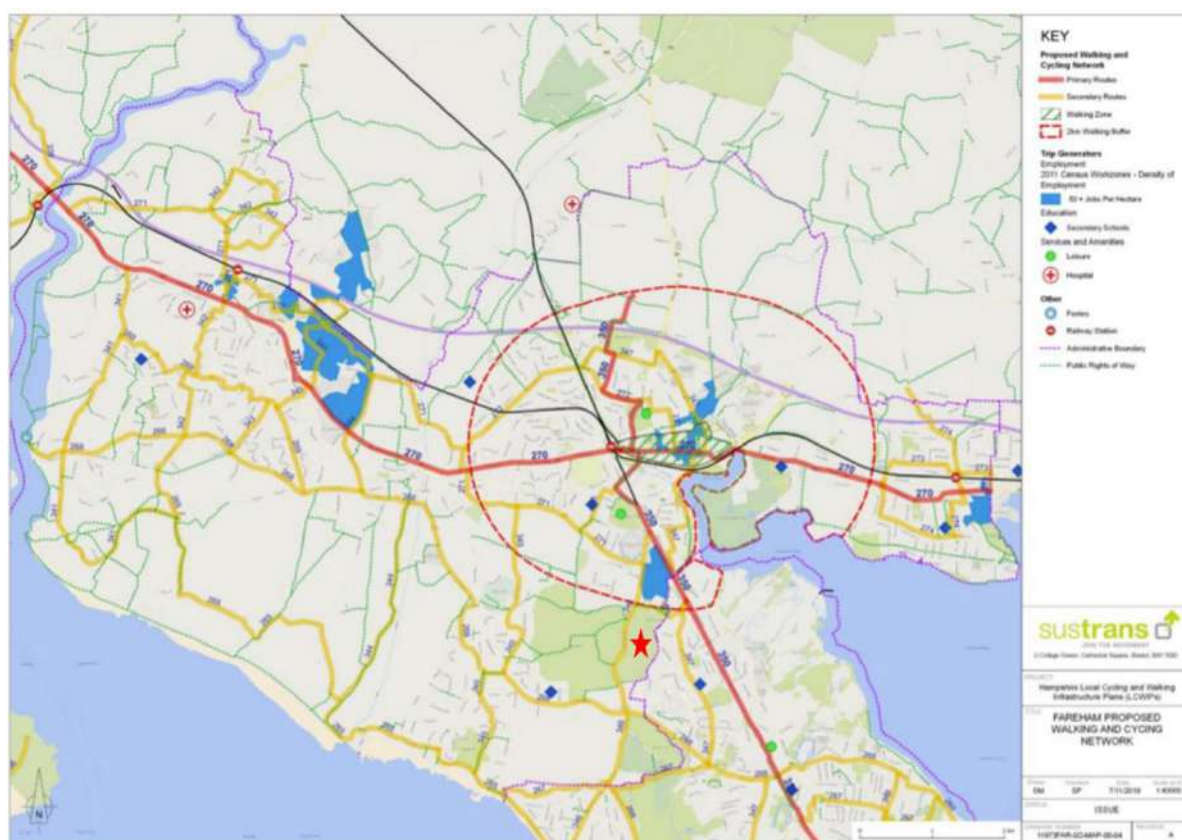
Image 2.2 – Sustainable Access Strategy Concepts



Source: Extract of WYG Concept Masterplan CMP-01 Rev A

- 2.7 The IDP (September 2020) identifies that Hampshire County Council (HCC) has commissioned a '*Local Walking and Cycling Infrastructure Plan*' which will feed into subsequent versions of the Fareham Infrastructure Delivery Plan (IDP).
- 2.8 The Strategic Transport Assessment identifies the proposed cycle network forming part of ongoing work to develop the WCIP (by HCC / Sustrans), which includes important corridors close to the site (**Image 2.3**). The site relates well to this network and demonstrates that there are good opportunities for sustainable movement and linkage with the emerging strategy.

Image 2.3 – Draft WCIP for Fareham (STA Figure 3-5)



- 2.9 Through CIL and the delivery of the IDP measures, development of the land at the site can assist in delivering these priorities and providing wider improvement to sustainable movement.
- 2.10 Opportunities for local walking and cycling improvements will be also developed as part of planning applications for the site and will focus on improving the connection between the site and local services and facilities, in line with the WCIP.
- 2.11 In relation to public transport, the site is well located relative to the South East Hampshire Rapid Transit (SEHRT) system some 5-10 minute walk from the site providing a high frequency 'turn-up and go' service between Fareham (station) and Gosport. A range of other regular public transport services operate locally to the site. Local bus routes are shown in **Image 2.4** and described in **Table 2.1**.

Image 2.4 – Bus Routes Operating Local to the Site



Table 2.1: Local Bus Service Summary

Bus Stop	Service	Route	Service Frequency			Times (M-F)	
			M-F	Sat	Sun	First Bus to:	Last Bus from:
Tukes Avenue	9/9A	Fareham-Bridgemary-Rowner-Gosport	2-3 services per hour in each direction	1-2 services per hour in each direction	1-2 services per hour in each direction	Gosport: 06:39, Fareham: 06:29	Gosport: 19:00, Fareham: 19:10
Henry Court Way	E1/2	Fareham- BRT - Gosport	Every 5-10 minutes	Every 10 minutes	Every 10 -15 minutes	Gosport: 06:04, Fareham: 06:06	Gosport: 22:34, Fareham: 22:35
Newgate Lane	21 / 21A	Fareham-Peel Common-Stubbington-Lee on the Solent	Every 1 to 2 hours	Every 1 to 2 hours	-	Stubbington: 08:39, Fareham: 09:15	Stubbington: 17:23, Fareham: 16:45

Source: Traveline

- 2.12 As part of future planning applications, opportunities to improve connections to these services will be explored, including providing connections and improvements to bus stop facilities. This will aim to make the walked part of the journey to public transport as convenient and attractive as possible. There is an opportunity to deliver new bus stops on Newgate Lane as part of the Primary Access proposal.
- 2.13 The initial stages of delivery of the SEHRT have proven very popular with sustained growth in bus patronage. HCC and its partners have more recently submitted funding bids to Government for later stages of the SEHRT which includes a potential extension of the SEHRT to the site and the Solent Enterprise Zone. This will further improve the accessibility of the site to public transport services.

Sustainable Transport Strategy Principles

- 2.14 The site is very well located to key local facilities and benefits from excellent sustainable connections within the wider area. The site therefore offers a significant opportunity to create a sustainable and integrated development that will positively contribute to the local area.
- 2.15 To build on the site's sustainable location relevant to local services, the development will be brought forward alongside a Sustainable Transport Strategy comprising a package of improvements to enhance access opportunities by all modes of travel. **Table 2.2** identifies a potential series of strategy principles to be applied to ensure that opportunities for sustainable transport are taken up.

Table 2.2: Sustainable Transport Strategy Principles

Principle	Measure
Reducing the Need to Travel	Ensure dwellings provide adequate space for home working, and that they are provided with appropriate infrastructure (i.e. broadband)
Promoting Walking	Delivery of a permeable development with pedestrian connections to Newgate Lane, Tukes Avenue and Brookers Lane
Promoting Cycling	Provide space for storage of bicycles within the curtilage of each dwelling
	Delivery of cycle routes and 'cycle friendly' streets in the site
	Cycle incentive schemes such as assisted purchase of equipment, training and user groups
	Provision of information to residents to identify suitable cycling routes in the area
Promoting Public Transport	Provision of designated walking connections to the bus stops on Newgate Lane, Tukes Avenue and at BRT
	Investigate bus stop improvements in the local area
	Promotion of BRT and local bus services through direct marketing and implementation of a range of journey planning incentives and strategies
Promote Smarter Choices	Promote a package of travel incentives, travel planning services and travel information to encourage sustainable travel. This would be delivered through a Travel Plan prepared for the site.

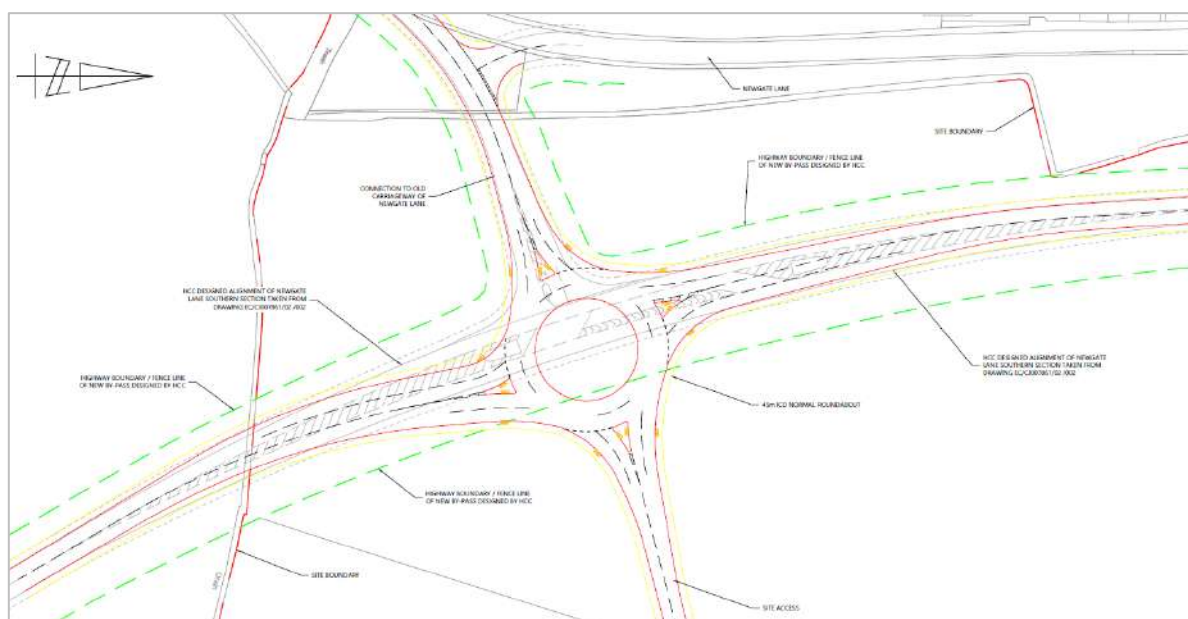
SECTION 3 SITE ACCESS STRATEGY

- 3.1 Substantial work has been carried out to develop an access strategy to the site.
- 3.2 Two opportunities for vehicular access are identified, with primary access proposed to Newgate Lane South and secondary access to Brookers Lane, along with the creation of multiple non-vehicular accesses to Newgate Lane, Brookers Lane, Tukes Avenue and to local Public Rights of Way. This strategy is consistent with the former draft Policy HA2 requirements in the Draft Local Plan 2036 (**Appendix A**) and demonstrated on the Concept Masterplan (**Appendix B / Image 2.2**).

Primary Access to Newgate Lane

- 3.3 To provide access to the majority of the development site, a new vehicular access is proposed to Newgate Lane South in the form of a four-arm 45m ICD 'normal' roundabout. The junction has been carefully designed to meet the following objectives:
- a Minimise interruptions to main line traffic flow on Newgate Lane South;
 - b Ensure that the function of the new road (i.e. to increase traffic capacity and ease congestion), is not prejudiced by the delivery of a new access; and
 - c Be deliverable within design standards and highway constraints.
- 3.4 **Drawing ITB10353-GA-003 Rev D** (extract at **Image 3.1**) presents an illustrative roundabout design which has been designed in full accordance with the Design Manual for Roads and Bridges (DMRB) standards for a 40mph road (which is the posted speed limit on Newgate Lane South).

Image 3.1 – Primary Access to Newgate Lane



- 3.5 To consider the operation of the proposed junction, an assessment of the future operation of the junction has been carried out using TRL's Junctions 9 software (**Table 3.1**).
- 3.6 Updated baseline traffic survey data from January 2019 has been obtained for Newgate Lane South which reflects conditions post opening of the new road. This data is included within a separate technical note considering site access (*report ref: ITB10353-006B*) included as **Appendix C** of this report.
- 3.7 Two assessment cases are considered to reflect the potential access options to Newgate Lane South and Brookers Lane:
- The 'Likely Case' assessment scenario assumes 425 dwellings will be accessed via the proposed roundabout to Newgate Lane East with a further circa 99 dwellings accessed separately from Brookers Lane; and
 - The 'Worst Case' assessment scenario assumes all 525 dwellings which could be accommodated across the HA2 site would be accessed directly from Newgate Lane East.

Table 3.1 – Operation of the Primary Access Roundabout to Newgate Lane South

Arm	AM Peak Hour				PM Peak Hour			
	RFC	Queue (veh)	Delay (s/veh)	LOS	RFC	Queue (veh)	Delay (s/veh)	LOS
Likely Case – 2036 with Committed Development plus Development (425 Dwellings)								
Newgate Lane (North)	0.37	<1	3	A	0.51	1	3	A
Site Access	0.15	<1	4	A	0.07	<1	4	A
Newgate Lane (South)	0.77	3	7	A	0.52	1	3	A
Newgate Lane (West)	0.10	<1	8	A	0.06	<1	4	A
Worst Case – 2036 with Committed Development plus Development (525 Dwellings)								
Newgate Lane (North)	0.37	<1	3	A	0.52	1	3	A
Site Access	0.19	<1	4	A	0.10	<1	4	A
Newgate Lane (South)	0.78	4	7	A	0.53	1	3	A
Newgate Lane (West)	0.11	<1	8	A	0.06	<1	4	A

- 3.8 The assessment demonstrates that both the 'Likely' and 'Worst Case' assessment scenarios (with the completion of the Stubbington Bypass which is under construction), the proposed roundabout will operate wholly within capacity (design capacity taken as RFC 0.85) and with a 'Level of Service' rating of 'A', classified as "**Free Flow**".
- 3.9 The greatest queueing delay on any arm during peak periods is some 8 seconds, with most approaches experiencing delay of around 5 seconds, which is clearly inconsequential and falls far below a threshold that could be considered to be significant.

Secondary Access to Brookers Lane

3.12 **Drawing ITB13747-GA-004 Rev F** presents the proposed access arrangement which was agreed with HCC as local highway authority in connection with the current planning application under consideration by FBC (P/19/1260/OA) and as determined by Gosport Borough Council (19/00516/OUT). This access is wholly deliverable and suitable to serve the development proposed.

[illegible]

3.13 HCC and GBC have previously raised objections to the allocation of HA2 on the basis that they are concerned about the possible impact of a new junction being formed to Newgate Lane South, and the potential for this to cause delays to the corridor.

- i The junction modelling demonstrates that 10 seconds additional delay will occur at this point on the network as a result of the new junction

- ii This delay could be reduced further using land within the control of the promoters
- iii Whilst the assessment has considered the access in isolation, the impact on the wider network needs to be demonstrated, which it is expected will be done through the forthcoming Local Plan Evidence Base.

- 3.15 HCC has not raised any in principle design or safety concerns with the junction and following substantial dialogue has accepted the junction modelling as a basis to consider the operation of the junction but required consideration of the corridor effects of the junction within the LP Evidence Base.
- 3.16 This wider corridor assessment has now been completed with the release of the FBC SRTM Assessment, summarised in Section 4 of this report. In summary this demonstrates that there are no material impacts on the wider Newgate Lane corridor that result from the delivery of an access to the HA2 site from Newgate Lane.
- 3.17 The SRTM Appraisal (**Image 4.1** and **Table 4.2**) demonstrate that no material delay will occur on the Newgate Lane corridor as a result of the delivery of the Development Strategy, which includes not only the HA2 site with access delivered to Newgate Lane South, but also the remainder of the planned growth in Fareham, comprising some 6,000 new homes above the 2036 Baseline, and including the two SGAs which are not being proposed for allocation at this stage.
- 3.18 Therefore, the Local Plan evidence base has demonstrated that the formation of a new junction to serve HA2 from Newgate Lane South, in association with the development of HA2 and the wider Development Strategy, will not have an unacceptable impact on the corridor, or journey times across it, and will in no way limit or remove the benefits associated with the recent delivery of the road improvement.

Pedestrian and Cycle Access Strategy

- 3.19 Details of the pedestrian and cycle access strategy are presented in Section 2.
- 3.20 This comprises the delivery of a permeable and connected development area, with linkages in all directions to Newgate Lane (for onward transit to Solent Enterprise Zone and Stubbington), to Tukes Avenue and Brookers Lane to connect to Bridgemary and to the local Public Rights of Way Network. The detail of these connections will be worked up as part of subsequent planning applications and will allow for all users. This constitutes a comprehensive approach to promote sustainable travel opportunities.

SECTION 4 Traffic Impacts

4.1 FBC has released an updated Traffic Modelling Report which considers the traffic impacts that are projected to arise as a result of the proposed Development Strategy. The assessment also includes the sites previously identified for allocation in the Supplement Local Plan, including the HA2 site and the two SGAs at Portchester and Stubbington.

4.2 The report has been prepared using the Solent Transport 'Sub-Regional Transport Model' (SRTM) which is owned by the Solent Local Authorities and has been calibrated and validated for use in accordance with WebTag Guidance, with the agreement of Highways England and Hampshire County Council. The intention of the assessment is to ***"model the proposed land allocations and identify key transport implications resulting from the scale and location of the allocations"***.

4.3 The assessment appraises the future (2036) operation of the local highway network both 'with' and 'without' the proposed Local Plan Development Strategy, taking account of committed development and infrastructure enhancements, and projected traffic growth. Development of the Newgate Lane HA2 site for 475 dwellings is assumed in the forecasting of the model, with access from Newgate Lane.

4.4 The primary outputs from the assessment is a consideration of highway network performance through considering changes in traffic flow, changes in highway delay and through identifying capacity hotspots by deriving a 'Ratio of Flow to Capacity' (RFC) for key junctions.

4.5 Impacts of the Development Strategy

4.5.1 In broad network terms, the assessments demonstrate that the traffic impact of the development strategy on top of the 2036 'Do Nothing' scenario will be relatively small, with an:

- Increase in vehicle hours by around 4-5%
- Increase in vehicle distance by 2%
- Reduction average network speeds by 2%

4.5.2 In terms of capacity hotspots, the addition of the Development Strategy above 2036 'Do Nothing' conditions results in an additional 5 junctions operating at some levels of stress (defined by FBC as 'significant impact') as a result of the additional traffic from Local Plan growth:

- A27 Bridge Road / Barnes Lane
- A27 The Avenue / Catisfield Road
- Segensworth Road East / Cartwright Drive
- Welborne Approach / Broadway / Zone 894 Access
- A27 Cams Hill / A27 Portchester Road / Downend Road / Shearwater Avenue

- 4.5.3 None of these impacted junctions are geographically close to the Newgate Lane South site.
- 4.5.4 Overall, in the 2036 'Do Something' scenario, which includes the local plan sites and proposed Strategic Growth Areas, there is a total of 17 junctions which meet the 'Significant' impact criteria, and two which meets the 'Severe' threshold (some distance from the site in Whitely and at A27 Redlands Lane).
- 4.5.5 Through its Strategic Transport Assessment and Junction Mitigation Report, FBC and HCC has now completed this work. Of the 18 junctions which met FBCs 'significant' and 'severe' thresholds, Table 11-2 of the Strategic Transport Assessment identifies that five were considered to require mitigation, the remainder would, on further review, not necessitate mitigation to address local plan impacts. **Image 4.1** presents the location of these junctions in the context of the site:

Image 4.1 – Junctions Considered for Mitigation



- 4.5.6 The reports present the results of the mitigation development which comprise:
- **Delme Roundabout** – signalisation of junction, adjustment to signal phasing/green times, additional physical capacity, public transport measures. Same as TCF bid scheme;
 - **Parkway/Leafy Lane** – signalisation of junction, additional physical capacity;
 - **Warsash Road/Abshot Road/Little Abshot Road** - additional physical capacity;
 - **A27/Redlands Avenue** - adjustment to signal phasing/green times; and
 - **A27/Bishopsfield Road** - adjustment to signal phasing/green times.

4.5.7 The Strategic Transport Assessment concludes that:

14.16. In conclusions, based on the work of this Strategic Transport Assessment, it is considered that the quantum and distribution of the development proposed in the Fareham Local Plan, and the resulting transport impacts, are capable of mitigation at the strategic level, and that the plan is therefore deliverable and sound from a transport perspective

4.5.8 On this basis, there are no significant or severe network capacity constraints that would preclude the HA2 site being delivered, and it is demonstrated that consideration of the wider impacts of the site (including also development on other now withdrawn allocation sites and the SGA) will not lead to any significant issues on the Newgate Lane corridor or other local highway connections.

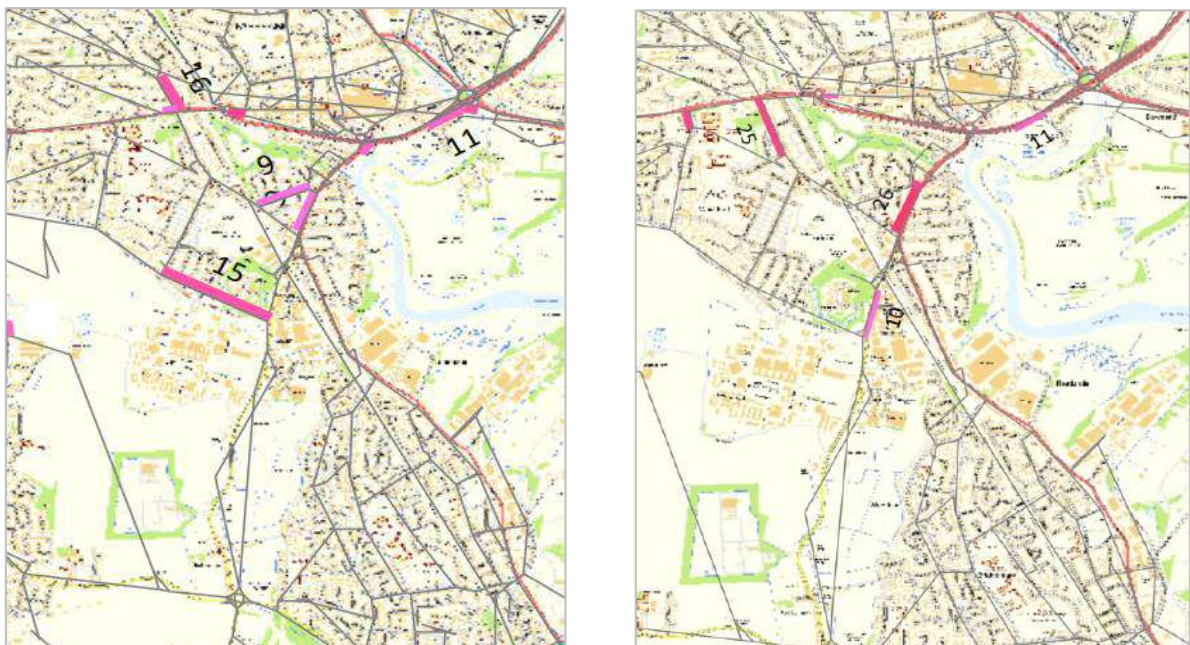
4.6 Impacts of the Development Strategy Relative to HA2

4.6.1 Whilst the SRTM assessment has not considered the individual impacts of particular development sites, and simply presents an assessment of the cumulative impact of the proposed Development Strategy, a review of the network local to the proposed HA2 site has been carried out to consider the impact of the proposed Development Strategy.

Delay Impacts

4.6.2 Image 4.2 presents the SRTM 'Delay' outputs local to the HA2 site.

Image 4.2 – Delay Impact of the Development Strategy – AM Peak



4.6.3 The SRTM assessment demonstrates that, taking account of the full Development Strategy (including the Strategic Growth Areas not now proposed and including HA2), there will be limited additional delay arising on the local network as a result of the proposed Local Plan growth:

- i Longfield Avenue – an additional 15 seconds delay in the AM Peak
- ii A32 between Newgate Lane and Quay Street – an additional 9 seconds delay in the AM peak, 26 seconds in the PM peak
- iii A27 corridor and approach to Titchfield Gyratory – 7 additional seconds delay in the AM Peak
- iv M27 Junction 11 approaches – an additional 11 seconds delay in each peak period

4.6.4 This is before the delivery of the mitigation measures proposed in the 'Do Something' Scenario.

Junction Impacts

4.6.5 The SRTM Assessment identifies the additional junction impacts arising from the delivery of the Development Strategy. This identifies that there are 18 junctions that meet the defined significance criteria, where junctions are operating close to their design capacity and where the impacts of development may be material. The location of these junctions is identified in **Image 4.3**, and an assessment of the impacts of the LP Development Strategy relative to HA2 is set out in **Table 4.1**, taking account of the 'Do Something' mitigation measures.

Image 4.3 – Location of Junctions meeting Performance Criteria



Table 4.1 – Junction Impacts Relative to HA2 Site – Impact on RFC (worst performing arm)

Junction		2036 'Baseline'		2036 'Do Something'		Difference	
		AM	PM	AM	PM	AM	PM
2	Segensworth Roundabout	107	98	108	98	1	0
3	M27 J11	106	107	105	108	-1	1
4	A27 Titchfield Gyratory	104	83	105	79	1	-4
7	Newgate Lane / Longfield Ave	102	100	102	101	0	1
26	A27 Delme Roundabout	86	70	68	74	-18	4
35	A27 Eastern Way / A32 Gosport Rd	101	87	103	90	2	3
38	Peel Common Roundabout	82	76	87	79	5	3
94	Quay Street Roundabout	58	100	63	101	5	1
65	M27 J9	94	88	94	90	0	2

4.6.6 Whilst there are network locations where capacity is likely to be reached, this is shown to be the case in the 2036 Baseline situation without the delivery of the Development Strategy. The impact of the LP Approach is clearly small, with RFC increases at the more sensitive junctions of around 1%. This level of impact will not have a material impact on network operation, as reinforced in **Table 4.2** which considers the delay that will arise from the additional of Local Plan growth.

Table 4.2 – Junction Impact relative to HA2 Site – Impact on Delay (secs) (worst performing arm)

Junction		2036 Baseline		2036 'Do Something'		Difference	
		AM	PM	AM	PM	AM	PM
2	Segensworth Roundabout	180	57	206	57	26	0
3	M27 J11	171	185	154	190	-17	5
4	A27 Titchfield Gyratory	144	29	161	27	17	-2
7	Newgate Lane / Longfield Ave	72	22	81	30	9	8
26	A27 Delme Roundabout	32	25	27	45	-5	20
35	A27 Eastern Way / A32 Gosport Rd	63	21	103	26	40	5
38	Peel Common Roundabout	*See below					
94	Quay Street Roundabout	17	29	17	35	0	6
65	M27 J9	73	167	86	177	13	10

*Appears to be a reporting issue for Junction 38 (Peel Common) where no delay figures present

- 4.6.7 None of the impacts relative to HA2 meet the threshold for a 'severe' impact identified in the SRTM assessment and whilst there are some junctions when, taking account of the full Development Strategy to deliver some 6,000 dwellings alongside non-residential development, would result in a 'significant' impact, when considered in proper detail, these impacts are small, resulting in increases in delay at junctions of generally 10-15 seconds. These are plainly small impacts and should not result in otherwise acceptable development coming forward.

Impacts of HA2 on the Newgate Lane Corridor

- 4.6.8 Both HCC and GBC raised concerns as part of the earlier Local Plan consultation response about the potential traffic impacts of delivering a new junction on Newgate Lane South to serve the proposed HA2 allocation. Their concerns focussed on the potential for diminishing of the capacity benefits delivered by the recently constructed highway scheme. Both HCC and GBC sought for this to be further considered as part of the Local Plan evidence base, which has now been carried out.
- 4.6.9 As is clearly demonstrated in **Image 4.2**, the delivery of development at HA2, including a new access junction onto the Newgate Lane corridor, will not have any material impact on journey times and delay on the recently improved Newgate Lane South corridor. As outlined in Section 3, HCC has confirmed that delays at the proposed roundabout junction itself are not significant in themselves, and that there is sufficient land available within the HA2 site to deliver a satisfactory junction.
- 4.6.10 On this basis, the LP Evidence base supports the delivery of a new access to Newgate Lane South and demonstrates that this will not result in any material harm, let alone a 'severe' impact.

Mitigating the Impacts of Development

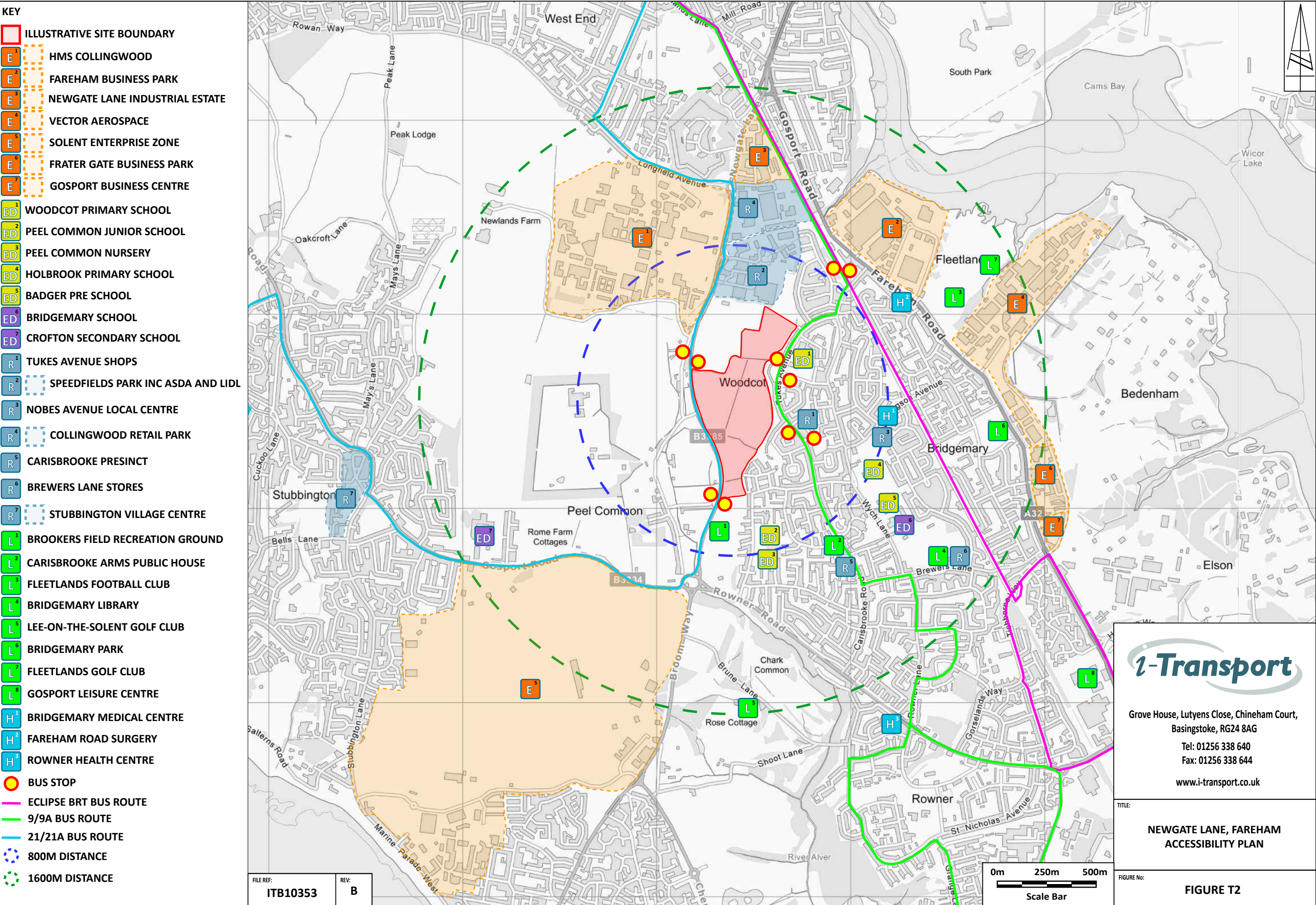
- 4.6.11 A Borough Wide Transport Assessment has been prepared by FBC to investigate the need and extent of any mitigation measures necessary. This focuses on the 18 junction locations which are identified by the assessments to require some improvement to accommodate the Development Strategy.
- 4.6.12 A draft Fareham Borough Council IDP (September 2020) has been prepared which identifies broad infrastructure requirements to deliver the Development Strategy, including a series of transport interventions. The highway improvement identified for the Delme Roundabout within the draft IDP which currently has a shortfall on funding which the HA2 site could provide a reasonable and proportionate financial contribution towards to assist HCC to implement the scheme.
- 4.6.13 Furthermore, a full Transport Assessment would be prepared which will consider specific development transport impacts in greater detail and will explore the need for improvements. This will identify a mitigation strategy which will comprise:

- i Promotion of sustainable travel opportunities, including improving existing connections to local services and facilities.
- ii Promotion of travel reduction measures.
- iii Targeted highway network improvements where shown to be necessary.

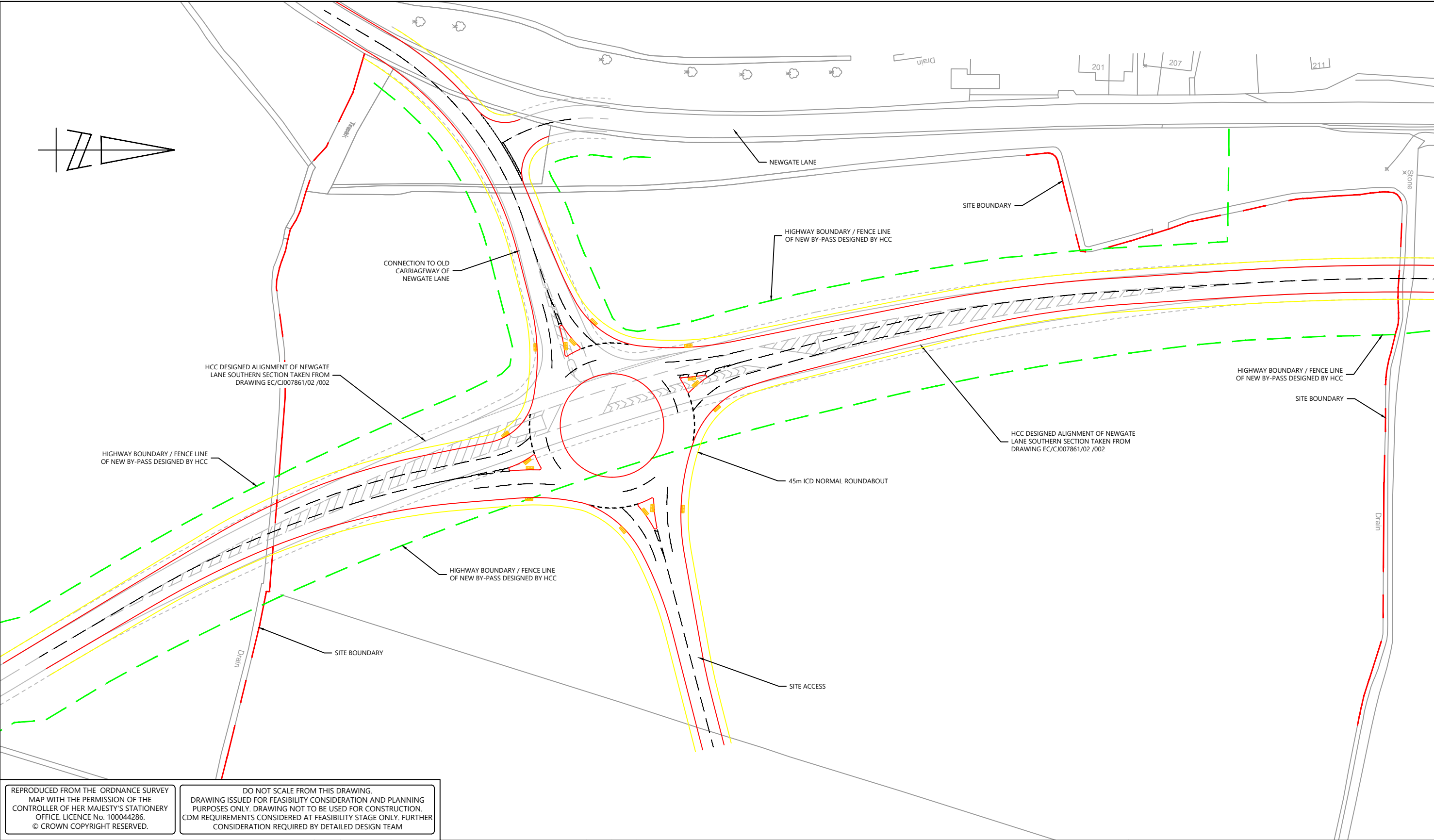
SECTION 5 SUMMARY AND CONCLUSION

- 5.1 Land East of Newgate Lane was previously allocated within the draft FBC draft Local Plan and is being promoted for residential development for some 515 dwellings.
- 5.2 The site is shown to be located in a highly sustainable location relative to services and facilities, and there are numerous opportunities for sustainable transport opportunities to be promoted and integrated into the site. The site promotes a sustainable transport strategy to promote opportunities for non-car based travel.
- 5.3 Access to the site is proposed at both Newgate lane South, via a normal roundabout junction, and to Brookers Lane. Whilst HCC and GBC have previously raised concern about the potential impact of a new junction onto Newgate Lane to significantly affect journey times on the corridor, the Council's Evidence Base clearly demonstrates that there will be no material impacts arising from accessing HA2 from Newgate Lane South.
- 5.4 More detailed assessment of the proposed roundabout junction demonstrates that it will meet all design standards and will operate under '**Free Flow**' conditions, with a maximum delay of 8 seconds, which is clearly insignificant. The principle of secondary access to Brookers Lane has been agreed with HCC and is shown to be deliverable.
- 5.5 The traffic impacts arising from the delivery of the Development Strategy have been assessed by FBC through their updated Evidence Base, which included the delivery of the HA2 site and the SGAs. This demonstrates that the impacts of the then Development Strategy are small, resulting in increased delay at key junctions of around 10-20 seconds. Measures to reduce impacts at key junctions have been investigated by FBC and HCC and are presented in their evidence base, confirming that the significant impacts of development can be addressed. Delivery of the site will assist in delivering the improvements needed to accommodate the development strategy for the borough.
- 5.6 Overall, development of the Land East of Newgate Lane scheme would:
- Provide safe and suitable access for all users
 - Represent sustainable development, and promote sustainable travel opportunities
 - Not result in any significant traffic impact, let alone severe impacts.

FIGURES




DRAWINGS



REPRODUCED FROM THE ORDNANCE SURVEY
MAP WITH THE PERMISSION OF THE
CONTROLLER OF HER MAJESTY'S STATIONERY
OFFICE. LICENCE No. 100044286.
© CROWN COPYRIGHT RESERVED.

DO NOT SCALE FROM THIS DRAWING.
DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING
PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION.
CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER
CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM

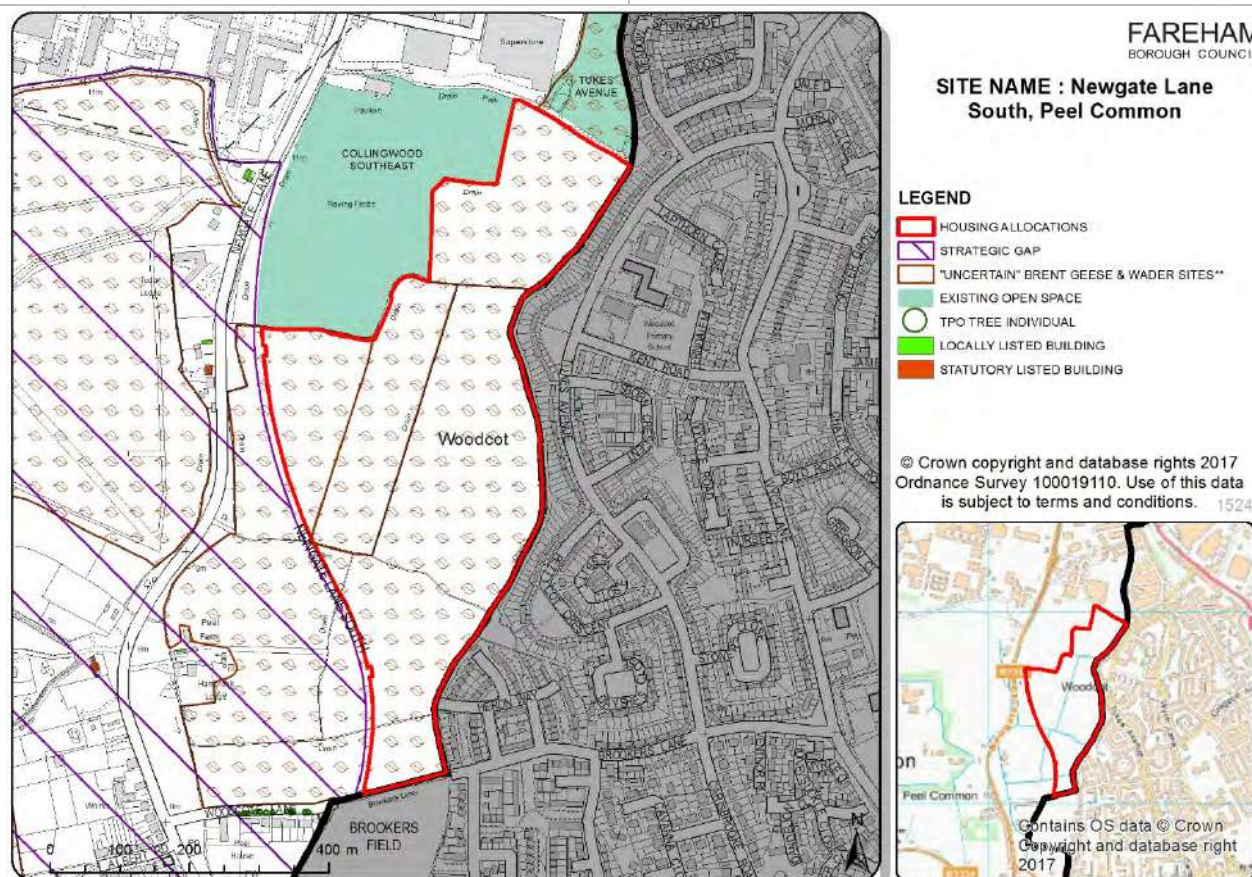
<div></div> <div>Grove House, Lutyens Close, Chineham Basingstoke, Hampshire, RG24 8AG</div> <div>www.i-transport.co.uk</div>	D		05.08.20	MC	SOUTH AND NORTH ARM AMENDED	TW	TW	TITLE: SITE ACCESS - OPTION 3	SCALE @ A3: 1:1000	CHECKED: TW	APPROVED: TW	
	C		15.07.20	MC	SOUTHERN ARM AMENDED	TW	TW		FILE REF: ITB10353	DRAWN: PH	DATE: AUG 2015	
	B		11.01.18	MC	SOUTHERN ARM AMENDED	TW	TW		PROJECT: LAND EAST OF NEWGATE LANE, FAREHAM	CLIENT: MILLER HOMES	DRAWING No: ITB10353-GA-003	
	A		19.08.15	PH	NORTHERN ARM AMENDED	TW	TW				PROJECT No: ITB10353	REV: D
	REV		DATE	BY	DESCRIPTION		CHK				APD	
	STATUS: DRAFT											

APPENDIX A. DEVELOPMENT FRAMEWORK PLAN

DEVELOPMENT ALLOCATIONS



Housing Site: HA2	SHLAA Reference: 3133 (incorporating 3002, 3028 and 3057)
Name: Newgate Lane South	Proposed Use: Residential
Location: Peel Common	Indicative Capacity: 475 dwellings
Size: 22.4ha	Planning Status: None



Planning permission will be granted provided that detailed proposals accord with the policies in the Local Plan and meet the following site specific requirements:

- The design and layout of proposals shall be informed by and be consistent with the Development Framework in Appendix D; and
- The quantum of housing proposed shall be broadly consistent with the indicative site capacity; and
- Primary highway access shall be focused on Newgate Lane South in the first instance, with Brookers Lane having the potential to provide secondary access for a limited number of dwellings; and
- The provision of a north-south natural greenspace buffer of 25 metres minimum width between proposed development and both the boundary of the Newgate Lane South highway and HMS Collingwood playing fields, in accordance with the Development Framework in Appendix D; and
- The provision of pedestrian and cycle connectivity between adjoining parcels as

DEVELOPMENT ALLOCATIONS



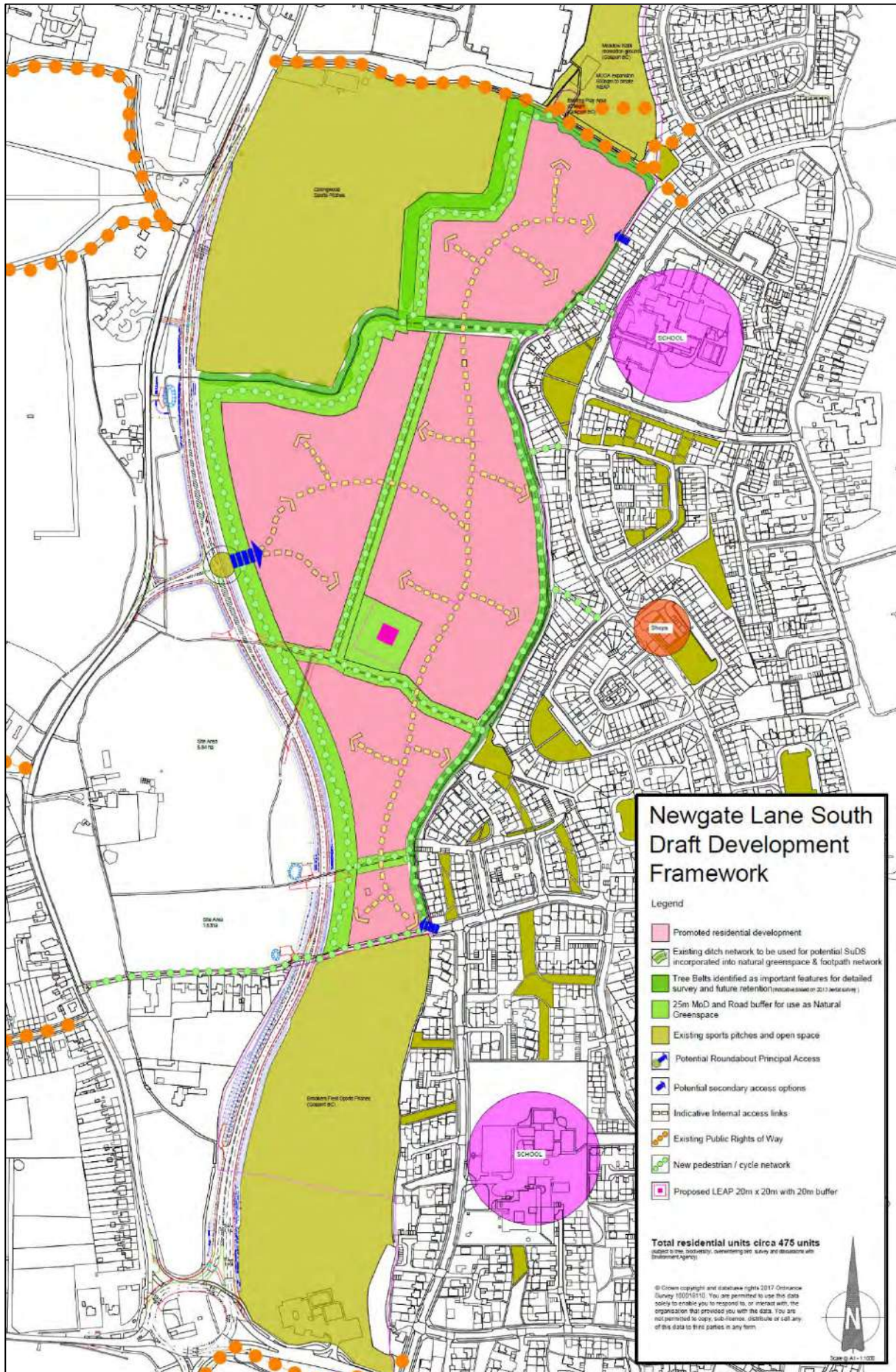
identified by the Development Framework, as well as safe pedestrian/ cycle crossing points of Newgate Lane South, safe and accessible walking/ cycling routes to local schools, open spaces and nearby facilities in Woodcot/Bridgemary.

- f) The provision of vehicular highway access between individual development parcels, as identified by the Development Framework, without prejudice to adjacent land in accordance with Policy D4; and
- g) Building heights shall be limited to a maximum of 2.5 storeys, except for buildings which front onto Newgate Lane South and Bridgmary/Woodcot where building heights shall be limited to a maximum of 2 storeys; and
- h) Existing trees subject to a Tree Preservation Order should be retained and incorporated within the design and layout of proposals in a manner that does not impact on living conditions; and
- i) Existing drainage ditches on-site should be retained and enhanced as part of a Sustainable Drainage System (SuDS) incorporated within the overall green network for the site; and
- j) Proposals shall either provide directly, or provide the mechanism for the delivery of the following infrastructure, having regard to national legislation on pooling contributions:
 - Off-site highway improvement and mitigations works; and
 - Local schools and early-years childcare improvements (as identified by the Local Education Authority); and
 - A Neighbourhood Equipped Area of Play (NEAP) and a Multi-Use Games Area (MUGA) for older children on-site as shown on the Development Framework; and
 - Improvements to existing off-site sports facilities at Brookers Field and Tukes Avenue.

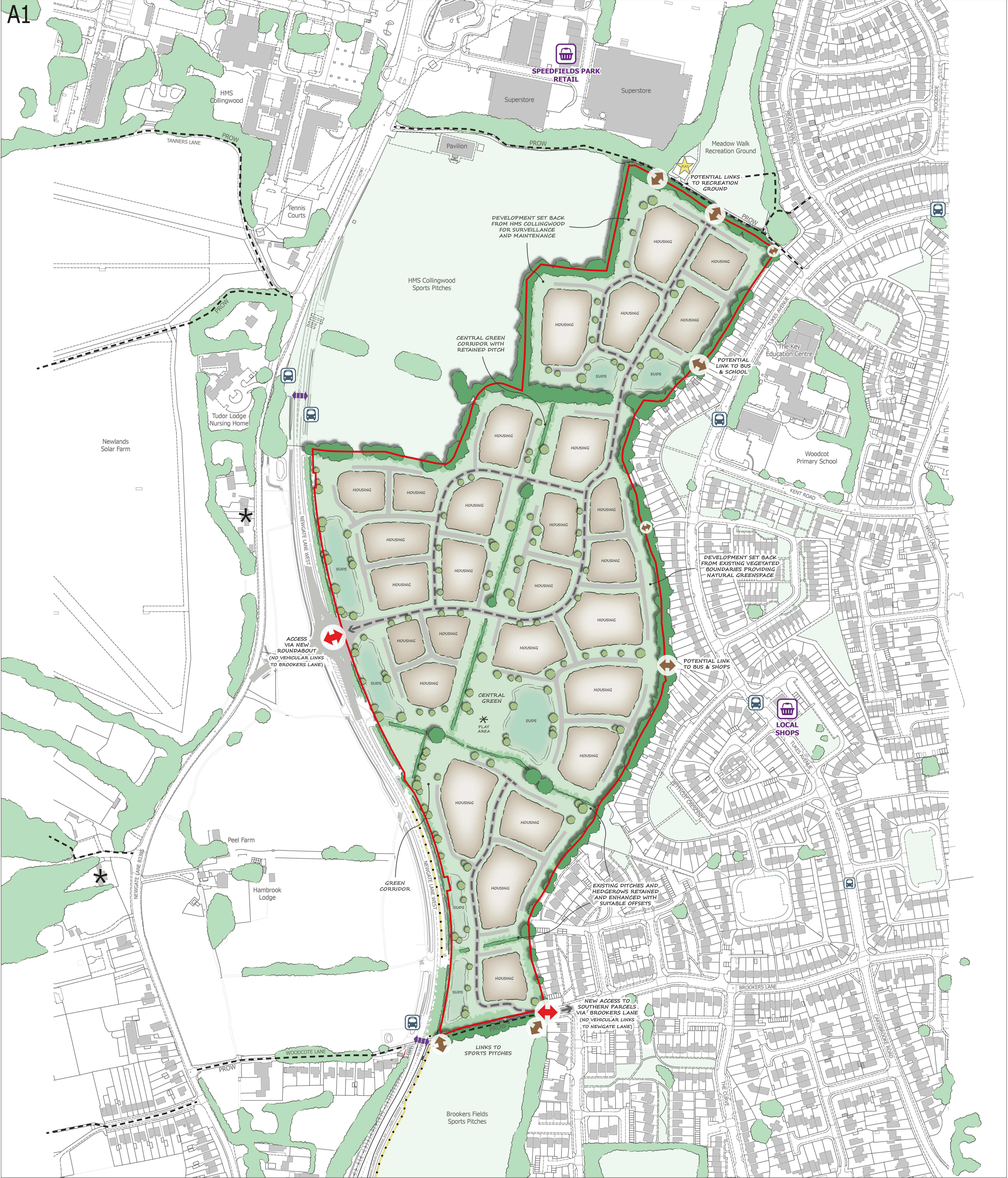
This site allocation is based around the delivery of the new section of highway known as Newgate Lane South. The road scheme is third stage of work on the Newgate Lane corridor, linking the improvements at the northern section of Newgate Lane, undertaken in 2014/15 and the Peel Common roundabout, in 2015/16. It replaces the existing route for through traffic. The scheme has both planning consent (P/15/0717/CC and 15/00382/HCC3) from Hampshire County Council and agreed funding from the Solent LEP. Furthermore, in summer 2017 construction of the new road commenced, with the works estimated to take approximately 12 months to complete. Once completed, the new road will form the western boundary of this site allocation.

The allocated land comprises a number of different site promoters. As such, the Council has composed a Development Framework (Appendix D) for the site which sets out the rationale and approach for achieving a comprehensive and coordinated development that allows for excellent connectivity throughout the site and to the surrounding area, whilst allowing for development to come forward on a phased basis.

The open space and equipped play space need has been derived when considering the overall quantum of development and how and where this can be best achieved within the overall comprehensive development.



APPENDIX B. CONCEPT MASTERPLAN



NOTES

This drawing is the copyright of WYG Environment Planning Transport Ltd 2015 ©. All rights reserved. Registered in England Number: 3050297.
Based upon Ordnance Survey data with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationary Office. © Crown Copyright. License No: AR 100017603. Contractors, Sub-contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect. Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHK'D
A	Pedestrian links updated	24/02/20	BA	-

KEY

- Indicative site boundary
- Existing vegetation
- Proposed vegetation
- Proposed residential development
- Proposed vehicle access
- Main vehicle route
- Potential pedestrian Links
- Play Area
- Sustainable Drainage Systems (SuDS)
- Public Right of Way
- Existing crossing points on Newgate Lane West
- Existing play area
- Existing bus stop
- Existing shops
- Listed building
- Existing acoustic fence



Urban & Landscape Design

Southampton Office
The Pavilion, Botleigh Grange Office Campus, Hedge End, Southampton, SO30 2AF
t: 02382 022 800 w: www.wyg.com

PROJECT
Newgate Lane South
Fareham
For: Consortium

DRAWING
Concept Masterplan - 01

SCALE 1:2000 @ A1 DATE 16/08/18 AUTHOR BA CHK'D TB

JOB NO. A097690 DRAWING NO. CMP-01 REV A

APPENDIX C. SITE ACCESS TECHNICAL NOTE

Technical Note

Project No: ITB10353
Project Title: Newgate Lane, Fareham
Title: Proposed Site Access Assessment
Ref: ITB10353-006a
Date: 10 August 2020

SECTION 1 Overview

- 1.1 Miller Homes and Bargate Homes are promoting Land at Newgate Lane South for residential development. i-Transport LLP has been appointed to provide highways and transport advice in relation to the development proposal.
- 1.2 The land is identified in the Draft Fareham Local Plan 2036 under Policy HA2 for development to deliver around 475 dwellings. The emerging policy for the site identifies that in relation to access:
- c) Primary highway access shall be focused on Newgate Lane South in the first instance, with Brookers Lane having the potential to provide secondary access for a limited number of dwellings; and***
- 1.3 A 'Site Access Strategy' note (*report ref: ITB10353-003*) was submitted to Fareham Borough Council (FBC) and Hampshire County Council (HCC) in February 2018 which assessed the proposed site access junction onto Newgate Lane South. Three potential access opportunities were assessed as follows:
- A priority junction including ghost island;
 - A normal four arm roundabout junction; and
 - A traffic signal-controlled junction.
- 1.4 Junction capacity assessments of the potential site access options determined that the four arm roundabout junction would operate efficiently as the primary access to the site without introducing any material impact on traffic using the Newgate Lane South corridor, whilst also addressing capacity issues that will exist at the existing Newgate Lane / Newgate Lane South junction. A priority junction would offer insufficient capacity and a signal junction would result in increased delay to mainline traffic.
- 1.5 For that reason, a 45m ICD normal roundabout junction to Newgate Lane is proposed as part of the development proposal, shown on **Drawing ITB10353-GA-003B**.

1.6 It is also proposed to provide a secondary access to the site onto Brookers Lane to the south-east of the site to serve circa 99 dwellings and this is shown in **Drawing ITB13747-GA-004F**. An application for the southern part of the HA2 site was submitted to FBC (planning application ref: P/19/1260/OA) and Gosport Borough Council (GBC) (planning application ref: 19/00516/OUT). HCC raised no objections to this access proposal in June 2020.

1.7 Local Plan Representations were submitted to FBC in February 2020 to the 'Update' of the Fareham Local Plan 2036 to demonstrate how the site can be delivered in transport terms and in accordance with the NPPF transport tests outlined in paragraphs 108 and 109.

1.8 HCC raised objections to the draft Plan, including to the allocation of HA2, on the basis that:

'The purpose of the current improvements to Newgate Lane is to address existing traffic congestion and environmental issues on Newgate Lane and other corridors providing access to the Gosport peninsula and to facilitate better strategic access to jobs at the Solent Enterprise Zone at Daedalus (which is also the case for the Stubbington bypass). An aim of the Enterprise Zone is to contribute to reducing the number and duration of vehicle trips on roads on the Gosport peninsula, in particular out commuting towards the A27 /M27 to access employment in the morning peak travel period. It is therefore the policy of the County Council to maintain the utility of the improvements provided to Newgate Lane in these terms. Consequently, the proposed housing allocation which is likely to both increase the levels of out-commuting from the peninsula in the morning peak travel period and negate the purposes of the Newgate Lane improvements is not supported.'

1.9 In relation to the access proposed to Newgate Lane, HCC's latest position is summarised as follows:

- The junction modelling demonstrates that 10 seconds additional delay will occur at this point on the network as a result of the new junction - This delay could be reduced further using land within the control of the promoters; and
- Whilst the assessment has considered the access in isolation, the impact on the wider network needs to be demonstrated, which it is expected will be done through the forthcoming Local Plan Evidence Base.

1.10 HCC has not raised any in principle design or safety concerns with the junction and following substantial dialogue has accepted the modelling as a basis to consider the operation of the junction but required consideration of the corridor effects of the junction within the LP Evidence Base. The Local Plan Reps in February 2020 reviewed the latest FBC Evidence Base which included traffic modelling using HCC's Sub-Regional Transport Model. In summary this demonstrates that there are no material impacts on the wider Newgate Lane corridor that result from the delivery of an access to the HA2 site from Newgate Lane. Therefore, the development of the site would not undermine the utility of the new road construction.

- 1.11 This Technical Note (TN) is provided to summarise what has previously been assessed in relation to the proposed roundabout junction to Newgate Lane South and to provide updated modelling results for the potential site access strategy to the site. In particular this utilises updated traffic survey data on Newgate Lane collected post completion of the road scheme.

SECTION 2 **Assessment Parameters**

- 2.1.1 Earlier traffic assessment was based on a development of 500 dwellings, all of which would be served from Newgate Lane South. The latest submissions by the promoters estimate that a total of 515 dwellings can be delivered on the site, of which 99 are expected to be accessed from Brookers Lane (in line with the current planning applications) with the remainder (416 dwellings) to be accessed from the proposed roundabout junction. Due to the uncertainties about the progress of the current application, the following scenarios are modelled at the proposed roundabout:

- Likely Case – 425 Dwellings -Assuming that 99 dwellings are accessed from Brookers Lane
- Worst Case – 525 dwellings, all accessed from the proposed roundabout

- 2.1.2 The Stubbington Bypass is now a fully funded, permitted scheme and construction has already commenced on the delivery of the road. All assessments therefore assume that the Stubbington Bypass will be in place and assess the period at the end of the planned Local Plan, in a future year of 2036. Traffic redistribution as a result of Stubbington Bypass has been estimated using HCC's planning application transport assessments for Stubbington Bypass.

Baseline Traffic Data

- 2.1.3 The previous assessments of the site access roundabout were undertaken using traffic survey data from November 2017 which pre-dated the completion of the road realignment.
- 2.1.4 New baseline traffic survey data has been obtained from the potential developments located to the west of Newgate Lane East and is included in **Appendix A**. This data was obtained in January 2019 and captured the turning counts for all movements on Newgate Lane East post completion of the scheme. The traffic modelling has been updated to reflect these post completion surveys.

Site Access Roundabout Design

- 2.1.5 Since the previous correspondence with FBC and HCC, and in view of the revised modelling, some minor alterations have been made to the site access design. The revised scheme is illustrated on **Drawing ITB10353-GA-003D** with the changes being increased approach flaring on the mainline arms, and on the Old Newgate Lane approach.

- 2.1.6 The alterations to the roundabout extend the two-lane approach on the southern arm of the roundabout. This will reduce any queueing and delay and allow the roundabout to operate efficiently in both peak periods whilst minimising any potential impact on Newgate Lane East which was a concern for HCC. Section 3 of this TN summarises the junction capacity assessments undertaken and demonstrates the site access roundabout operates efficiently with minimal queueing and delay.

Trip Rates

- 2.1.7 To assess the impact of the proposed development on the potential site access roundabout and Newgate Lane South, the following vehicle trip rates presented in **Table 2.1** have been utilised, which mirror those agreed with HCC for the nearby development proposal at Newlands.

Table 2.1: Development Trip Rates

	Morning Peak Period			Evening Peak Period		
	In	Out	Total	In	Out	Total
Trip Rates	0.085	0.389	0.474	0.376	0.163	0.539
425 Dwellings – Likely Case	36	165	201	160	69	229
525 Dwellings – Worst Case	43	195	238	188	82	270

Source: TRICS

- 2.1.8 The proposed development is expected to generate a total of 238 two-way vehicle movements during the morning peak period and 270 two-way vehicle movements during the evening peak period. Under the worst case assessment, all of these movements would use the proposed roundabout junction. This equates to four to five two-way vehicle movements each minute during the peak periods.
- 2.1.9 This is a robust assessment of traffic generation. The site is well located to major employment areas (Daedalus and Speedfields Park) and to community facilities, with good potential for sustainable travel use. The trip rates used in the assessment make no allowance for modal shift away from the private car, or for affordable housing provision and apartments which typically generate less peak demand.

Traffic Distribution and Assignment

- 2.1.10 **Table 2.2** sets out the development traffic distribution and assignment which has been previously presented to HCC. Traffic is distributed and assigned based on a combination of Census Journey to Work data for employment trips, and a bespoke Gravity model for non-employment trips. The Census Data used pre-dates the establishment of Daedalus as an Enterprise Zone and in practice this will mean that less employment trips are likely to seek to leave the peninsular, with the site being very well located to Daedalus. The location of the site relative to Daedalus EZ provides a strong opportunity to encourage sustainable access to employment. The full traffic distribution is included in **Appendix B**.

Table 2.2: Development Traffic Distribution and Assignment at Proposed Roundabout

Description of Route		% Traffic	Morning Peak			Evening Peak		
			In	Out	Two-Way	In	Out	Two-Way
Likely Case – 425 Dwellings								
North	Newgate Lane South	41%	15	68	83	66	28	94
South	Newgate Lane South	59%	21	97	118	94	41	135
Total		100%	36	165	201	160	69	229
Worst Case – 525 Dwellings								
North	Newgate Lane South	41%	18	80	98	77	34	111
South	Newgate Lane South	59%	25	115	140	111	48	159
Total		100%	43	195	238	188	82	270

SECTION 3 Junction Capacity Assessment

3.1.1 The proposed roundabout has been assessed using TRL's Junctions 9 modelling software. Since the previous correspondence with HCC, minor amendments have been made to the site access arrangement to improve its operation by increasing the flare length of the approach arms. A drawing demonstrating the model geometry is provided on **Drawing ITB10353-GEOM-001**.

3.1.2 **Table 3.1** provides the assessment results, with the full outputs provided in **Appendix C**.

Table 3.1: Site Access Roundabout – Updated Traffic Modelling Assessment

Approach	Morning Peak Period				Evening Peak Period			
	RFC	Queue (veh)	Delay (s/veh)	LoS	RFC	Queue (veh)	Delay (s/veh)	LoS
Likely Case - 2036 with Committed Development plus Development (425 Dwellings)								
Newgate Ln (N)	0.37	<1	3	A	0.51	1	3	A
Site Access (E)	0.15	<1	4	A	0.07	<1	4	A
Newgate Ln (S)	0.77	3	7	A	0.52	1	3	A
Newgate Ln (W)	0.10	<1	8	A	0.06	<1	4	A
Worst Case - 2036 with Committed Development plus Development (525 Dwellings)								
Newgate Ln (N)	0.37	<1	3	A	0.52	1	3	A
Site Access (E)	0.19	<1	4	A	0.10	<1	4	A
Newgate Ln (S)	0.78	4	7	A	0.53	1	3	A
Newgate Ln (W)	0.11	<1	8	A	0.06	<1	4	A

Source: Junctions 9

- 3.1.3 The assessment demonstrates that the proposed site access roundabout junction will operate comfortably within capacity on all arms of the roundabout, both under the 'Likely Case' and 'Worst Case' assessments. The worst performing arm of the junction exhibits a Ratio of Flow to Capacity (RFC) value of 0.78 (Newgate Lane S AM) whereas design capacity is taken as 0.85 RFC.
- 3.1.4 The maximum modelled average delay is on the western arm of the junction, where an average of eight seconds delay is projected in the morning peak. During the evening peak period, the maximum modelling average delay is on the eastern arm of the junction, where an average of just four seconds delay is projected. This level of delay is inconsequential and means the junction operates under free flow conditions.
- 3.1.5 The 'Level of Service' for all arms of the junction is LOS 'A', which equates to 'Free Flow', the highest performing category of operation. This is consistent with the junction capacity assessment submitted to FBC and HCC during February 2018.

3.2 Sensitivity Tests

- 3.2.1 As part of earlier engagement, HCC requested a series of Sensitivity Test assessments to appraise the performance of the junction and to understand tolerances. The Sensitivity Test scenarios were:
- Sensitivity Test 1: Development traffic distributed 75% to the north and 25% to the south;
 - Sensitivity Test 2: Development traffic distributed 90% to the north and 10% to the south;
 - Sensitivity Test 3: Development traffic generation uplifted by 20%;
 - Sensitivity Test 4: Development traffic uplifted by 20% and distributed 75% north / 25% south;
 - Sensitivity Test 5: Development traffic uplifted by 20% and distributed 90% north / 10% south.
- 3.2.2 The trip rates applied in the main assessment, as outlined at 2.1.1 and 2.1.2 remain appropriate and robust, whereas the traffic distribution and assignment model (**Appendix B** and **Table 2.2**) presents a realistic appraisal of traffic routing. Nevertheless, these further Sensitivity Tests were carried out and have been updated to consider the latest scheme options.

Sensitivity Test Trip Rates

- 3.2.3 Sensitivity Tests 3 to 5 require a 20% uplift in trip generation. This assessment was undertaken to demonstrate the acceptability of the proposed site access as this uplift is much higher than what would be expected for a strategic scale site. The uplifted trip rates and generation are presented in **Table 3.2**.

Table 3.2: Development Trip Rates (20% Uplift)

	Morning Peak Period			Evening Peak Period		
	In	Out	Total	In	Out	Total
Trip Rate	0.102	0.467	0.569	0.451	0.196	0.647
425 Dwellings – Likely Case	43	198	242	192	83	275
525 Dwellings – Worst Case	54	245	299	237	103	340

Source: Consultants Calculations / TRICS

- 3.2.4 **Table 3.2** shows the uplifted trip rates will generate 299 two-way vehicle movements during the morning peak period and 340 two-way vehicle movements during the evening peak period. This equates to around five to six two-way vehicle movements per minute.

Sensitivity Test Junction Operation

- 3.2.5 The Sensitivity Test junction capacity results are summarised in **Table 3.3**. The junction capacity modelling outputs are presented in **Appendix D**. The assessment results presented are for the 'Worst Case' assessment, assuming a development of 525 dwellings, all accesses through the proposed roundabout junction, and so overestimate traffic generation through the junction.

Table 3.3: Site Access – Sensitivity Test (525 Dwellings)

Approach	Morning Peak Period				Evening Peak Period			
	RFC	Queue (veh)	Delay (s/veh)	LoS	RFC	Queue (veh)	Delay (s/veh)	LoS
2036 with Committed Development plus Development (Sensitivity Test 1)								
Newgate Ln (N)	0.52	1	4	A	0.74	3	6	A
Site Access (E)	0.24	<1	5	A	0.13	<1	7	A
Newgate Ln (S)	0.79	4	7	A	0.51	1	3	A
Newgate Ln (W)	0.11	<1	9	A	0.06	<1	4	A
2036 with Committed Development plus Development (Sensitivity Test 2)								
Newgate Ln (N)	0.53	1	4	A	0.75	3	6	A
Site Access (E)	0.24	<1	5	A	0.13	<1	7	A
Newgate Ln (S)	0.80	4	8	A	0.50	1	3	A
Newgate Ln (W)	0.12	<1	9	A	0.06	<1	4	A
2036 with Committed Development plus Development (Sensitivity Test 3)								
Newgate Ln (N)	0.52	1	4	A	0.74	3	6	A
Site Access (E)	0.28	<1	6	A	0.16	<1	7	A
Newgate Ln (S)	0.79	4	7	A	0.54	1	3	A
Newgate Ln (W)	0.11	<1	8	A	0.06	<1	4	A

Approach	Morning Peak Period				Evening Peak Period			
	RFC	Queue (veh)	Delay (s/veh)	LoS	RFC	Queue (veh)	Delay (s/veh)	LoS
2036 with Committed Development plus Development (Sensitivity Test 4)								
Newgate Ln (N)	0.53	1	4	A	0.76	3	7	A
Site Access (E)	0.28	<1	6	A	0.16	<1	7	A
Newgate Ln (S)	0.80	4	8	A	0.51	1	3	A
Newgate Ln (W)	0.12	<1	9	A	0.06	<1	4	A
2036 with Committed Development plus Development (Sensitivity Test 5)								
Newgate Ln (N)	0.53	1	4	A	0.76	3	7	A
Site Access (E)	0.28	<1	6	A	0.16	<1	7	A
Newgate Ln (S)	0.81	4	8	A	0.50	1	3	A
Newgate Ln (W)	0.12	<1	10	A	0.06	<1	4	A

Source: Junctions 9

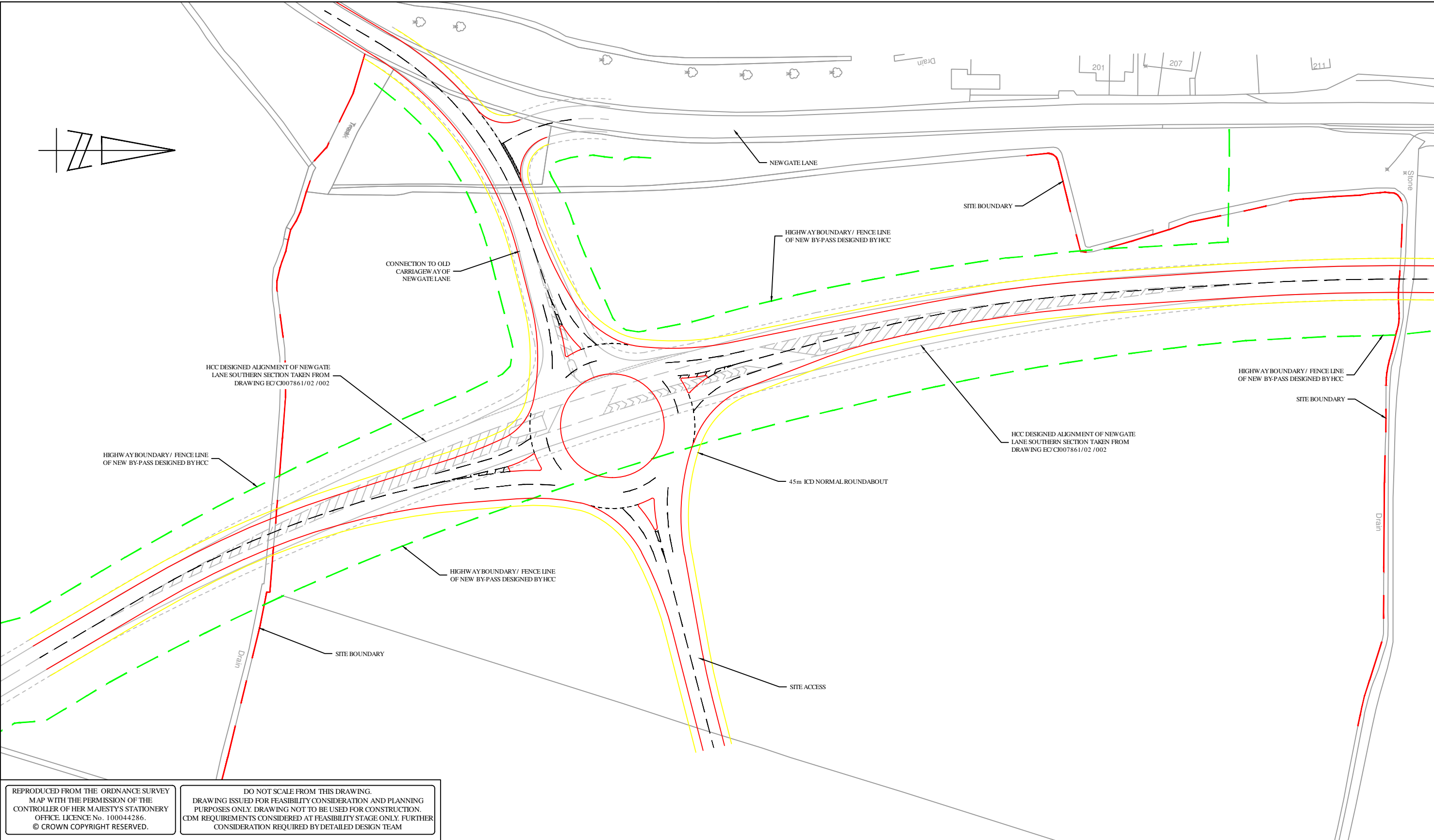
- 3.2.6** The proposed site access will continue to operate within capacity on all arms of the roundabout under all Sensitivity Test scenarios. The greatest average delay of just 10 seconds will be experienced on the western arm of the roundabout during the Sensitivity Test 5 morning peak period. This demonstrates the site access roundabout will operate efficiently under the unlikely and robust assessment scenarios as all approaches retain a LOS of 'A – Free Flow'. For mainline flows, even under the most strenuous Sensitivity Test (ST 5) delay for traffic travelling northbound is an average of 8 seconds and 4 seconds southbound in the morning peak, and 3 seconds northbound 7 southbound in the evening peak. This level of limited delay will have no impact on the utility of the Newgate Lane Scheme.

SECTION 4 Summary and Conclusions

- 4.1** Miller Homes and Bargate Homes are promoting Land at Newgate Lane South (draft allocation HA2) for residential development of around 515 dwellings. i-Transport LLP has been appointed to provide highways and transport advice in relation to the development proposal.
- 4.2** The operation of the proposed roundabout has been considered on the basis of the Likely Case (with 425 dwellings served from the roundabout and 99 from Brookers Lane) and the 'Worst Case' which assumes all 525 dwellings would use the proposed roundabout. HCC has not objected to the current planning application for the southern part of the site with access to Brookers Lane.


- 4.3 The Trip rates applied are robust and the distribution and assignment estimates realistic. The scheme has been updated to improve the operation of the southern arm by extending the flare on approach and the assessments have been updated to use more recently collected traffic data which post-dates completion of the Newgate Lane improvement. There remains sufficient land within either the public highway or the promoter's control to carry out any further design amendments that HCC may reasonably require.
- 4.4 The proposed roundabout junction is demonstrated to operate wholly within capacity under both the Likely Case and Worst Case. All arms of the junction operate within design capacity and with a Level of Service rating of 'A – Free Flow'. Maximum delay on any one arm is 8 seconds which is inconsequential and will have no material impact on the operation of Newgate Lane.
- 4.5 A series of sensitivity tests have also been carried out following earlier dialogue with HCC. These consider a combination of uplifted trip rates and revised traffic distribution. In each case the roundabout operates within capacity and acceptably, without introducing any material delay.
- 4.6 HCC's concerns that the delivery of the HA2 development and access to Newgate Lane will undermine the function of the recent improvement are not borne out by the empirically based appraisal of the junction. Wider impacts of FBC's spatial strategy are being considered through the Council's evidence base. The latest assessment demonstrates that that there are no material impacts on the wider Newgate Lane corridor that result from the delivery of an access to the HA2 site from Newgate Lane.
- 4.7 The development of the site for residential uses in close proximity to the Daedalus Enterprise Zone and well located to local facilities will overall assist in reducing the levels of out commuting in the peninsular, with significant opportunity for local trips to be made by sustainable modes.

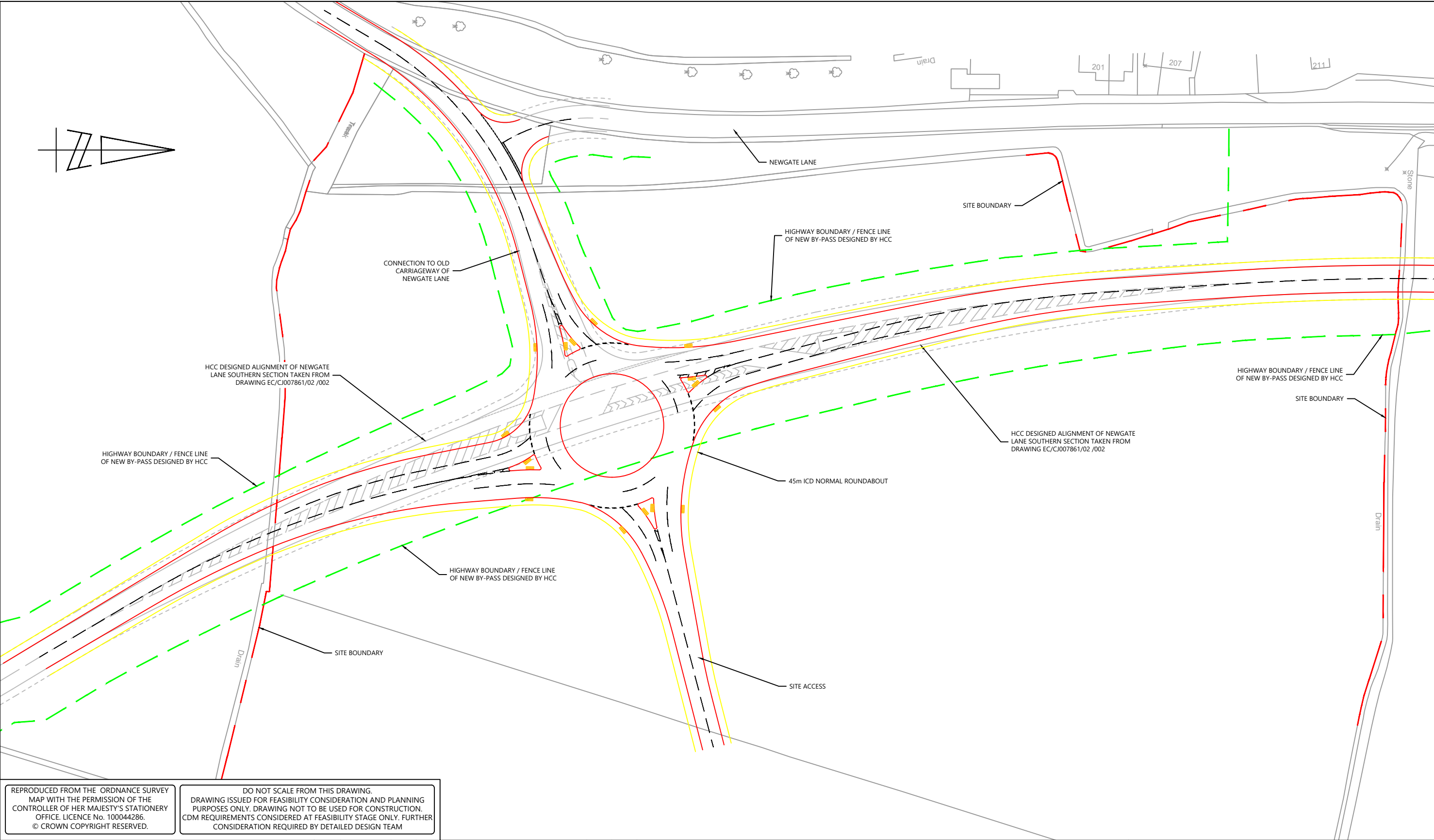
DRAWINGS



REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED.


DO NOT SCALE FROM THIS DRAWING. DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION. CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM

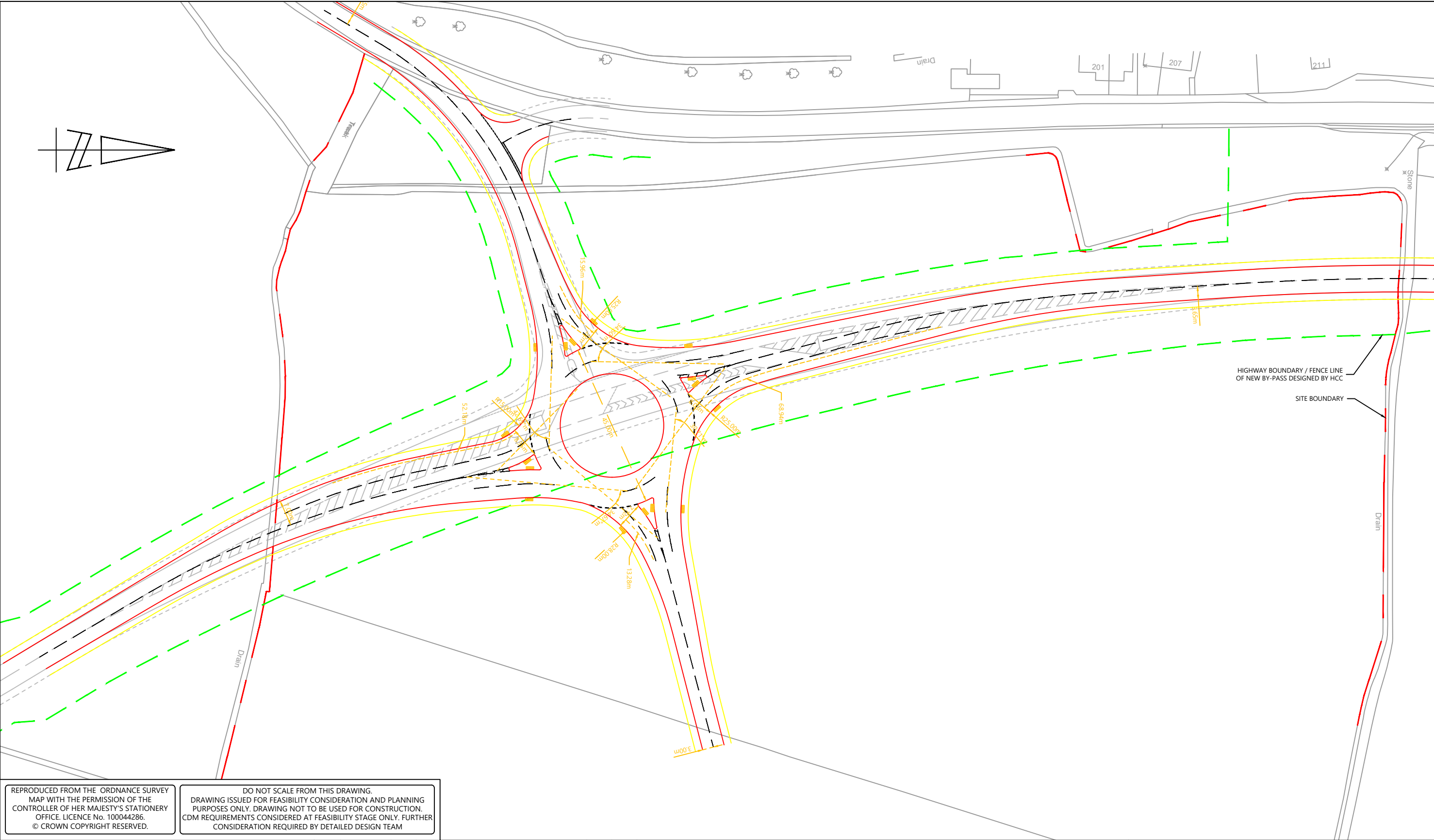
 Grove House, Intyens Close, Chineham Basingstoke, Hampshire, RG24 8AG Tel: 01256 338640 Fax: 01256 338644 www.i-transport.co.uk		B		MC		SOUTHERN ARM AMENDED		TW		TW		TITLE:		SCALE @ A3:		CHECKED:		APPROVED:	
		A		PH		NORTHERN ARM AMENDED		TW		TW		PROJECT:		1:1000		TW		TW	
		REV		DATE		BY		CHK		APD		CLIENT:		FILE REF:		DRAWN:		DATE:	
		STATUS:		DRAFT		LAND EAST OF NEWGATE LANE, FAREHAM		MILLER HOMES		DRAWING No:		ITB10353-GA-003		PROJECT No:		REV:		B	
														ITB10353					



REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED.

DO NOT SCALE FROM THIS DRAWING. DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION. CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM

<div><p>Grove House, Lutyens Close, Chineham Basingstoke, Hampshire, RG24 8AG</p><p>Tel: 01256 338640 Fax: 01256 338644</p><p>www.i-transport.co.uk</p></div>		D	05.08.20	MC	SOUTH AND NORTH ARM AMENDED	TW	TW	TITLE: SITE ACCESS - OPTION 3		SCALE @ A3: 1:1000	CHECKED: TW	APPROVED: TW
		C	15.07.20	MC	SOUTHERN ARM AMENDED	TW	TW			FILE REF: ITB10353	DRAWN: PH	DATE: AUG 2015
		B	11.01.18	MC	SOUTHERN ARM AMENDED	TW	TW			DRAWING No: ITB10353-GA-003		
		A	19.08.15	PH	NORTHERN ARM AMENDED	TW	TW					
		REV	DATE	BY	DESCRIPTION	CHK	APD	PROJECT: LAND EAST OF NEWGATE LANE, FAREHAM	CLIENT: MILLER HOMES	PROJECT No: ITB10353	REV: D	
STATUS: DRAFT												



REPRODUCED FROM THE ORDNANCE SURVEY
MAP WITH THE PERMISSION OF THE
CONTROLLER OF HER MAJESTY'S STATIONERY
OFFICE. LICENCE No. 100044286.
© CROWN COPYRIGHT RESERVED.

DO NOT SCALE FROM THIS DRAWING.
DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING
PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION.
CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER
CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM



Grove House, Lutyens Close, Chineham
Basingstoke, Hampshire, RG24 8AG
www.i-transport.co.uk

Tel: 01256 338640
Fax: 01256 338644

REV	DATE	BY	DESCRIPTION	CHK	APD
STATUS: FOR INFORMATION					

TITLE: SITE ACCESS - OPTION 3	
PROJECT: LAND EAST OF NEWGATE LANE, FAREHAM	CLIENT: MILLER HOMES

SCALE @ A3: 1:1000	CHECKED: TW	APPROVED: TW
FILE REF: ITB10353	DRAWN: MC	DATE: 07.08.20
DRAWING No: ITB10353-GEOM-001		
PROJECT No: ITB10353		REV: -

APPENDIX A. TRAFFIC SURVEY DATA

Fareham Wednesday 30th January 2019

Junction: (4) Newgate Lane / Newgate Lane East

Approach: Newgate Lane (North)

TIME	Ahead to Newgate Lane East				Right to Newgate Lane (West)			
	LIGHT	HEAVY	BUS	TOTAL	LIGHT	HEAVY	BUS	TOTAL
0700 - 0715	138	7	0	145	2	0	0	2
0715 - 0730	136	6	0	142	4	0	0	4
0730 - 0745	184	7	1	192	3	1	0	4
0745 - 0800	209	11	0	220	4	0	0	4
Hourly Total	667	31	1	699	13	1	0	14
0800 - 0815	199	11	1	211	6	0	0	6
0815 - 0830	185	16	0	201	8	0	0	8
0830 - 0845	167	12	0	179	5	1	0	6
0845 - 0900	156	11	0	167	3	0	0	3
Hourly Total	707	50	1	758	22	1	0	23
0900 - 0915	152	11	0	163	11	1	0	12
0915 - 0930	152	11	1	164	8	1	0	9
0930 - 0945	156	8	0	164	6	0	0	6
0945 - 1000	160	7	0	167	6	0	0	6
Hourly Total	620	37	1	658	31	2	0	33

Session Total	1994	118	3	2115	66	4	0	70
----------------------	-------------	------------	----------	-------------	-----------	----------	----------	-----------

1600 - 1615	356	4	0	360	3	0	0	3
1615 - 1630	341	3	0	344	6	0	0	6
1630 - 1645	356	5	0	361	5	0	0	5
1645 - 1700	355	3	1	359	9	0	0	9
Hourly Total	1408	15	1	1424	23	0	0	23
1700 - 1715	321	2	0	323	7	0	0	7
1715 - 1730	323	4	0	327	7	0	0	7
1730 - 1745	319	2	0	321	2	0	0	2
1745 - 1800	322	4	0	326	7	0	0	7
Hourly Total	1285	12	0	1297	23	0	0	23
1800 - 1815	325	1	1	327	5	0	0	5
1815 - 1830	344	3	0	347	4	0	0	4
1830 - 1845	277	3	0	280	3	0	0	3
1845 - 1900	201	2	0	203	3	0	0	3
Hourly Total	1147	9	1	1157	15	0	0	15

Session Total	3840	36	2	3878	61	0	0	61
----------------------	-------------	-----------	----------	-------------	-----------	----------	----------	-----------

Queues Measured as Stationary Vehicles (Maximum Observed in Period)

TIME	Queue Lengths (Vehicles)
700	0
705	0
710	0
715	0
720	0
725	0
730	0
735	0
740	0
745	0
750	0
755	0
800	0
805	0
810	0
815	0
820	0
825	0
830	0
835	0
840	0
845	0
850	0
855	0
900	0
905	0
910	0
915	0
920	0
925	0
930	0
935	0
940	0
945	0
950	0
955	0

TIME	Queue Lengths (Vehicles)
1600	0
1605	0
1610	0
1615	0
1620	0
1625	0
1630	0
1635	0
1640	0
1645	0
1650	0
1655	0
1700	0
1705	0
1710	0
1715	0
1720	0
1725	0
1730	0
1735	0
1740	0
1745	0
1750	0
1755	0
1800	0
1805	0
1810	0
1815	0
1820	0
1825	0
1830	0
1835	0
1840	0
1845	0
1850	0
1855	0

Fareham Wednesday 30th January 2019

Junction: (4) Newgate Lane / Newgate Lane East

Approach: Newgate Lane East

TIME	Left to Newgate Lane (West)				Ahead to Newgate Lane (North)			
	LIGHT	HEAVY	BUS	TOTAL	LIGHT	HEAVY	BUS	TOTAL
0700 - 0715	2	0	0	2	314	3	0	317
0715 - 0730	5	0	0	5	321	5	0	326
0730 - 0745	3	0	0	3	331	8	1	340
0745 - 0800	5	1	0	6	347	7	0	354
Hourly Total	15	1	0	16	1313	23	1	1337
0800 - 0815	3	0	0	3	385	7	0	392
0815 - 0830	4	0	0	4	398	13	1	412
0830 - 0845	6	1	0	7	344	7	0	351
0845 - 0900	4	0	0	4	374	17	1	392
Hourly Total	17	1	0	18	1501	44	2	1547
0900 - 0915	5	0	0	5	374	17	2	393
0915 - 0930	1	0	0	1	303	16	1	320
0930 - 0945	2	0	0	2	301	11	0	312
0945 - 1000	2	0	0	2	308	7	2	317
Hourly Total	10	0	0	10	1286	51	5	1342

Session Total	42	2	0	44	4100	118	8	4226
----------------------	-----------	----------	----------	-----------	-------------	------------	----------	-------------

1600 - 1615	2	0	0	2	215	6	0	221
1615 - 1630	7	0	0	7	233	7	2	242
1630 - 1645	6	0	0	6	241	3	0	244
1645 - 1700	3	0	0	3	251	4	0	255
Hourly Total	18	0	0	18	940	20	2	962
1700 - 1715	7	0	0	7	231	0	0	231
1715 - 1730	5	0	0	5	246	1	2	249
1730 - 1745	2	0	0	2	223	3	0	226
1745 - 1800	3	0	0	3	174	2	0	176
Hourly Total	17	0	0	17	874	6	2	882
1800 - 1815	2	0	0	2	173	3	0	176
1815 - 1830	2	0	0	2	171	1	1	173
1830 - 1845	1	0	0	1	131	2	0	133
1845 - 1900	3	0	0	3	160	1	0	161
Hourly Total	8	0	0	8	635	7	1	643

Session Total	43	0	0	43	2449	33	5	2487
----------------------	-----------	----------	----------	-----------	-------------	-----------	----------	-------------

Queues Measured as Stationary Vehicles (Maximum Observed in Period)

TIME	Queue Lengths (Vehicles)
700	0
705	0
710	0
715	0
720	0
725	0
730	0
735	0
740	0
745	0
750	0
755	0
800	0
805	0
810	0
815	0
820	0
825	0
830	0
835	0
840	0
845	0
850	0
855	0
900	0
905	0
910	0
915	0
920	0
925	0
930	0
935	0
940	0
945	0
950	0
955	0

TIME	Queue Lengths (Vehicles)
1600	0
1605	0
1610	0
1615	0
1620	0
1625	0
1630	0
1635	0
1640	0
1645	0
1650	0
1655	0
1700	0
1705	0
1710	0
1715	0
1720	0
1725	0
1730	0
1735	0
1740	0
1745	0
1750	0
1755	0
1800	0
1805	0
1810	0
1815	0
1820	0
1825	0
1830	0
1835	0
1840	0
1845	0
1850	0
1855	0

Fareham Wednesday 30th January 2019

Junction: (4) Newgate Lane / Newgate Lane East

Approach: Newgate Lane (West)

TIME	Left to Newgate Lane (North)				Right to Newgate Lane East			
	LIGHT	HEAVY	BUS	TOTAL	LIGHT	HEAVY	BUS	TOTAL
0700 - 0715	1	0	0	1	3	0	0	3
0715 - 0730	2	0	0	2	3	0	0	3
0730 - 0745	2	0	0	2	4	0	0	4
0745 - 0800	4	1	0	5	5	0	0	5
Hourly Total	9	1	0	10	15	0	0	15
0800 - 0815	4	0	0	4	6	0	0	6
0815 - 0830	5	0	0	5	9	0	0	9
0830 - 0845	2	1	0	3	5	0	0	5
0845 - 0900	6	1	0	7	5	0	0	5
Hourly Total	17	2	0	19	25	0	0	25
0900 - 0915	8	0	0	8	3	1	0	4
0915 - 0930	5	0	0	5	6	1	0	7
0930 - 0945	2	0	0	2	4	0	0	4
0945 - 1000	4	0	0	4	3	0	0	3
Hourly Total	19	0	0	19	16	2	0	18

Session Total	45	3	0	48	56	2	0	58
----------------------	-----------	----------	----------	-----------	-----------	----------	----------	-----------

1600 - 1615	3	0	0	3	2	0	0	2
1615 - 1630	3	0	0	3	6	0	0	6
1630 - 1645	9	0	0	9	5	0	0	5
1645 - 1700	3	0	0	3	5	0	0	5
Hourly Total	18	0	0	18	18	0	0	18
1700 - 1715	7	0	0	7	9	0	0	9
1715 - 1730	2	0	0	2	7	0	0	7
1730 - 1745	5	0	0	5	9	0	0	9
1745 - 1800	9	0	0	9	3	0	0	3
Hourly Total	23	0	0	23	28	0	0	28
1800 - 1815	6	0	0	6	4	0	0	4
1815 - 1830	5	0	0	5	3	0	0	3
1830 - 1845	8	0	0	8	1	0	0	1
1845 - 1900	3	0	0	3	1	0	0	1
Hourly Total	22	0	0	22	9	0	0	9

Session Total	63	0	0	63	55	0	0	55
----------------------	-----------	----------	----------	-----------	-----------	----------	----------	-----------

Queues Measured as Stationary Vehicles (Maximum Observed in Period)

TIME	Queue Lengths (Vehicles)
700	0
705	0
710	0
715	0
720	0
725	0
730	0
735	0
740	0
745	0
750	0
755	0
800	0
805	0
810	3
815	0
820	0
825	3
830	0
835	0
840	0
845	3
850	0
855	3
900	2
905	0
910	3
915	0
920	0
925	2
930	0
935	0
940	0
945	0
950	0
955	0

TIME	Queue Lengths (Vehicles)
1600	0
1605	0
1610	0
1615	2
1620	0
1625	0
1630	0
1635	2
1640	0
1645	3
1650	0
1655	0
1700	3
1705	4
1710	0
1715	3
1720	0
1725	3
1730	0
1735	3
1740	0
1745	0
1750	0
1755	0
1800	3
1805	0
1810	2
1815	0
1820	2
1825	2
1830	0
1835	2
1840	0
1845	0
1850	0
1855	0

APPENDIX B. TRAFFIC DISTRIBUTION MODEL

Destination	% Car by Destination	Proportion by Car	Route 1	Route 2	Route 3	Route 4	Route 5	Peak Journey Time	Proportion by Route	Proportion By Car
Andover	100%	0.23%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	90	5%	0.012%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	87	20%	0.047%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	84	75%	0.175%
			Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	90	5%	0.044%
Basingstoke	88%	0.88%	Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	87	20%	0.177%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	84	75%	0.662%
			Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	5	100%	4.747%
Bridgemaey	41%	4.75%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	7	100%	2.710%
Brookhurst	60%	2.71%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	11	100%	0.391%
Camdentown	41%	0.39%	Newgate Lane North	Longfield Avenue	A27 Southampton Road	Highlands Road	Highlands Road	11	40%	0.384%
Catfield	75%	0.96%	Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	Highlands Road	Highlands Road	10	60%	0.577%
Chichester	52%	0.78%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	55	100%	0.779%
Clayhall	65%	2.19%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	6	100%	2.187%
Eastleigh	82%	5.61%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	50	5%	0.280%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	47	20%	1.121%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	44	75%	4.204%
			Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Gosport Road	A27 Gosport Road	17	60%	7.185%
Fareham	54%	11.97%	Newgate Lane North	Longfield Avenue	A27 Southampton Road	A27 Southampton Road	A27 Southampton Road	19	40%	4.790%
Gosport	57%	5.13%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	16	100%	5.130%
Havant	89%	3.75%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	33	100%	3.746%
Holbrook	66%	1.56%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	6	100%	1.564%
Isle of Wight	0%	0.03%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	25	100%	0.026%
Lee-on-the-Solent	67%	1.79%	Newgate Lane South	Broom Way	Broom Way	Broom Way	Broom Way	6	100%	1.794%
London	53%	0.60%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	N/A	100%	0.597%
Other East	82%	0.68%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	N/A	100%	0.676%
Other North	83%	3.56%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	N/A	5%	0.178%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	N/A	20%	0.713%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	N/A	75%	2.673%
			Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	N/A	5%	0.092%
Other West	76%	1.84%	Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	N/A	20%	0.369%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	N/A	75%	1.382%
			Petersfield	100%	0.36%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound
Portchester	80%	0.68%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Portsmouth Road	A27 Portsmouth Road	20	100%	0.677%
Portsmouth	68%	15.45%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	30	60%	9.272%
			Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Portsmouth Road	A27 Portsmouth Road	35	40%	6.182%
			Privett	66%	1.28%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	A32 North
Reading	0%	0.13%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	120	5%	0.006%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	117	20%	0.026%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	114	75%	0.097%
			Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	68	5%	0.031%
Romsey	71%	0.62%	Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	65	20%	0.125%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	62	75%	0.468%
			Rowner	62%	1.28%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East
Southampton	79%	4.98%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	60	5%	0.249%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	57	20%	0.996%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	54	75%	3.734%
Stubbington	38%	6.87%	Newgate Lane South	B3334 Gosport Road	B3334 Gosport Road	B3334 Gosport Road	B3334 Gosport Road	4	100%	6.868%
Swanwick	82%	7.79%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	31	0%	0.000%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	25	10%	0.779%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	21	90%	7.008%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	B3334	Bridge Street	10	40%	0.529%
Titchfield	88%	1.32%	Newgate Lane South	B3334 Gosport Road	Bridge Street	Bridge Street	Bridge Street	8	60%	0.794%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	Warash Road	Warash Road	17	40%	0.373%
Warash	86%	0.93%	Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	Warash Road	Warash Road	16	60%	0.560%
Waterlooville	100%	0.34%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	39	100%	0.337%
Winchester	75%	8.56%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	53	15%	1.284%
			Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	50	20%	1.712%
			Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	47	50%	4.281%
			Newgate Lane South	B3334 Gosport Road	Mill Lane	B2177 Winchester Rd	B2177 Winchester Rd	52	15%	1.284%
Total		100.00%								100.00%

[illegible]

ITB10353 Newgate Lane, Fareham
Gravity Model

Location	Time (mins)	2011 Census Pop	P/T	P/T^2	% of total	Car driver mode split		% of Car Driver	55.00%	Route 1	Route 2	Route 3	Route 4	Route 5	Proportion	%
Gosport	13	71,762	5,520	425	21.6%	57.0%	12.3%	21.4%	11.8%	Newgate Lane South	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	B3334 Gosport Road East	100%	21.4%
Lee on Solent	6	10,860	1,810	302	15.4%	67.0%	10.3%	17.9%	9.8%	Newgate Lane South	Broom Way	Broom Way	Broom Way	Broom Way	100%	17.9%
Fareham	18	73,282	4,071	226	11.5%	54.0%	6.2%	10.8%	5.9%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Gosport Road	A27 Gosport Road	60%	6.5%
										Newgate Lane North	Longfield Avenue	A27 Southampton Road	A27 Southampton Road	A27 Southampton Road	40%	4.3%
Eastleigh	45	125,900	2,798	62	3.2%	82.0%	2.6%	4.5%	2.5%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	5%	0.2%
										Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	20%	0.9%
										Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	75%	3.4%
Havant	30	120,700	4,023	134	6.8%	89.0%	6.1%	10.6%	5.8%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	100%	10.6%
Portsmouth	32	205,056	6,408	200	10.2%	68.0%	6.9%	12.1%	6.6%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Eastbound	60%	7.2%
										Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Portsmouth Road	A27 Portsmouth Road	40%	4.8%
Stubbington	5	14,077	2,815	563	28.7%	38.0%	10.9%	19.0%	10.4%	Newgate Lane South	B3334 Gosport Road	B3334 Gosport Road	B3334 Gosport Road	B3334 Gosport Road	100%	19.0%
Swanwick	25	9,013	361	14	0.7%	82.0%	0.6%	1.0%	0.6%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	M27 Junction 11	M27 Westbound	0%	0.0%
										Newgate Lane North	Longfield Avenue	A27 Southampton Road	M27 Junction 9	M27 Westbound	10%	0.1%
										Newgate Lane South	B3334 Gosport Road	A27 Southampton Road	M27 Junction 9	M27 Westbound	90%	0.9%
Porchester	20	15,209	760	38	1.9%	80.0%	1.5%	2.7%	1.5%	Newgate Lane North	A32 Gosport Road	A27 Gosport Road	A27 Portsmouth Road	A27 Portsmouth Road	100%	2.7%
		645,859	28,567	1,965	100%			100.0%	55.0%							100.0%

Route 1	Proportion by Car	
	100%	55%
Brookers Lane East	0.0%	0.0%
Newgate Lane North	37.4%	20.6%
Newgate Lane South	62.6%	34.4%
	100.0%	55.0%

Route 2	Proportion by Car	
	100%	55%
Wych Lane South	0.0%	0.0%
A32 Gosport Road	32.0%	17.6%
Longfield Avenue	5.3%	2.9%
B3334 Gosport Road	23.3%	12.8%
B3334 Gosport Road East	21.4%	11.8%
Broom Way	17.9%	9.8%
	100.0%	55.0%

Route 3	Proportion by Car	
	100%	55%
Rowners lane South	0.0%	0.0%
A27 Gosport Road	32.0%	17.6%
A27 Southampton Road	9.7%	5.3%
B3334 Gosport Road	19.0%	10.4%
B3334 Gosport Road East	21.4%	11.8%
Broom Way	17.9%	9.8%
	100.0%	55.0%

Route 4	Proportion by Car	
	100%	55%
B3345 East	0.0%	0.0%
A27 Gosport Road	6.5%	3.6%
A27 Southampton Road	4.3%	2.4%
M27 Junction 11	18.0%	9.9%
M27 Junction 9	5.3%	2.9%
A27 Portsmouth Road	7.5%	4.1%
B3334 Gosport Road	19.0%	10.4%
B3345 West	0.0%	0.0%
B3334 Gosport Road East	21.4%	11.8%
Broom Way	17.9%	9.8%
	100.0%	55.0%

Route 5	Proportion by Car	
	100%	55%
B3345 East	0.0%	0.0%
A27 Gosport Road	6.5%	3.6%
A27 Southampton Road	4.3%	2.4%
M27 Westbound	5.6%	3.1%
M27 Eastbound	17.8%	9.8%
A27 Portsmouth Road	7.5%	4.1%
B3334 Gosport Road	19.0%	10.4%
Manor Way South	0.0%	0.0%
B3334 Gosport Road East	21.4%	11.8%
Broom Way	17.9%	9.8%
	100.0%	55.0%

Combined Distribution - Scearnio A

	Work 45%	Non Work 55%	Total Combined
Andover	0.10%		0.10%
Basingstoke	0.40%		0.40%
Bridgemary	2.14%		2.14%
Brockhurst	1.22%		1.22%
Camdentown	0.18%		0.18%
Catisfield	0.43%		0.43%
Chichester	0.35%		0.35%
Clayhall	0.98%		0.98%
Eastleigh	2.52%	2.5%	5.01%
Fareham	5.39%	5.9%	11.34%
Gosport	2.31%	11.8%	14.10%
Havant	1.69%	5.8%	7.50%
Holbrook	0.70%		0.70%
Isle of Wight	0.01%		0.01%
Lee-on-the-Solent	0.81%	9.8%	10.65%
London	0.27%		0.27%
Other East	0.30%		0.30%
Other North	1.60%		1.60%
Other West	0.83%		0.83%
Petersfield	0.16%		0.16%
Portchester	0.30%	1.5%	1.79%
Portsmouth	6.95%	6.6%	13.59%
Privett	0.57%		0.57%
Reading	0.06%		0.06%
Romsey	0.28%		0.28%
Rowner	0.58%		0.58%
Southampton	2.24%		2.24%
Stubbington	3.09%	10.4%	13.51%
Swanwick	3.50%	0.6%	4.08%
Titchfield	0.60%		0.60%
Warsash	0.42%		0.42%
Waterlooville	0.15%		0.15%
Winchester	3.85%		3.85%
	45.00%	55.00%	100.00%

Route 1	45%	55%	100%
Brookers Lane East			
Newgate Lane North	20.4%	20.6%	41.00%
Newgate Lane South	24.56%	34.4%	59.00%
	45%	55%	100%

Route 2	45%	55%	100%
Wych Lane South			0.00%
A32 Gosport Road	15.0%	17.6%	32.61%
Longfield Avenue	5.46%	2.9%	8.40%
B3334 Gosport Road	15.6%	12.8%	28.45%
Broom Way		9.8%	10.65%
B3334 Gosport Road East	8.1%	11.8%	19.90%
	45%	55%	100%

Route 3	45%	55%	100%
Rowners Lane South			0.00%
A27 Gosport Road	15.0%	17.6%	32.61%
A27 Southampton Road	17.08%	5.3%	22.40%
B3334 Gosport Road	3.1%	10.4%	13.51%
Bridge Street	0.4%		0.36%
Mill Lane	0.6%		0.58%
B3334 Gosport Road East	8.1%	11.8%	19.90%
Broom Way	0.8%	9.8%	10.65%
Wych Lane South			0.00%
	45%	55%	100%

Route 4	45%	55%	100%
M27 Junction 11	8.7%	9.92%	18.58%
A27 Portsmouth Road	3.1%	4.1%	7.22%
A27 Gosport Road	3.2%	3.6%	6.80%
M27 Junction 9	13.8%	2.9%	16.77%
B3334	0.2%		0.24%
A27 Southampton Road	2.2%	2.4%	4.54%
Highlands Road	0.4%		0.43%
Warsash Road	0.4%		0.42%
B3334 Gosport Road	3.1%	10.4%	13.51%
Bridge Street	0.4%		0.36%
B2177 Winchester Rd	0.6%		0.58%
B3334 Gosport Road East	8.1%	11.8%	19.90%
Broom Way	0.8%	9.8%	10.65%
B3345 East			0.00%
B3345 West			0.00%
Wych Lane South			0.00%
	45%	55%	100%

Route 5	45%	55%	100%
M27 Westbound	14.8%	3.06%	17.87%
M27 Eastbound	7.1%	9.8%	16.90%
A32 North	0.6%		0.57%
A27 Portsmouth Road	3.1%	4.1%	7.22%
A27 Gosport Road	3.2%	3.6%	6.80%
A27 Southampton Road	2.2%	2.4%	4.54%
Highlands Road	0.4%		0.43%
Warsash Road	0.4%		0.42%
B3334 Gosport Road	3.1%	10.4%	13.51%
Bridge Street	0.6%		0.60%
B2177 Winchester Rd	0.6%		0.58%
B3334 Gosport Road East	8.1%	12%	19.90%
Broom Way	0.8%	10%	10.65%
B3345 East			0.00%
Manor Way South			0.00%
Wych Lane South			0.00%
	45%	55%	100%

APPENDIX C. JUNCTION MODELLING ASSESSMENT

Junctions 9	
ARCADY 9 - Roundabout Module	
Version: 9.5.1.7462 © Copyright TRL Limited, 2019	
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk	
The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution	

Filename: Site Access Roundabout 425 Aug 2020.j9

Path: T:\Projects\10000 Series Project Numbers\10353\TB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\Access Strategy Note Modelling

Report generation date: 07/08/2020 09:52:03

- »2020 with CD + Development , AM
- »2020 with CD + Development , PM
- »2036 with CD + Development , AM
- »2036 with CD + Development , PM
- »2036 with CD + Development - Redistributed, AM
- »2036 with CD + Development - Redistributed, PM

Summary of junction performance

	AM					PM				
	Set ID	Queue (Veh)	Delay (s)	RFC	LOS	Set ID	Queue (Veh)	Delay (s)	RFC	LOS
	2020 with CD + Development									
1 - Newgate Lane North	D1	1.0	3.27	0.49	A	D2	2.1	5.11	0.68	A
2 - Site Access East		0.2	4.87	0.18	A		0.1	5.85	0.10	A
3 - Newgate Lane South		2.7	5.61	0.73	A		1.0	2.90	0.50	A
4 - Newgate Lane West (Connection)		0.1	6.93	0.08	A		0.1	3.82	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.45	0.52	A	D4	2.5	5.71	0.72	A
2 - Site Access East		0.2	5.13	0.19	A		0.1	6.34	0.11	A
3 - Newgate Lane South		3.3	6.56	0.77	A		1.1	3.04	0.52	A
4 - Newgate Lane West (Connection)		0.1	7.91	0.10	A		0.1	4.00	0.06	A
	2036 with CD + Development - Redistributed									
1 - Newgate Lane North	D7	0.6	2.63	0.37	A	D8	1.0	3.33	0.51	A
2 - Site Access East		0.2	3.92	0.15	A		0.1	4.21	0.07	A
3 - Newgate Lane South		3.3	6.56	0.77	A		1.1	3.04	0.52	A
4 - Newgate Lane West (Connection)		0.1	7.91	0.10	A		0.1	4.00	0.06	A

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	(untitled)
Location	
Site number	
Date	05/01/2018
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	I-TRANSPORT\Hotdesk
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	Veh	perTimeSegment	s	-Min	perMin

Analysis Options

Calculate Queue Percentiles	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
		0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)
D1	2020 with CD + Development	AM	DIRECT	07:15	08:15	60	15
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	60	15
D3	2036 with CD + Development	AM	DIRECT	07:15	08:15	60	15
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	60	15
D7	2036 with CD + Development - Redistributed	AM	DIRECT	07:15	08:15	60	15
D8	2036 with CD + Development - Redistributed	PM	DIRECT	16:00	17:00	60	15

Analysis Set Details

ID	Network flow scaling factor (%)
A1	100.000

2020 with CD + Development , AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Geometry	1 - Newgate Lane North - Roundabout Geometry	Effective flare length is over 30m, which is outside the normal range. Treat capacities with increasing caution.
Warning	Geometry	3 - Newgate Lane South - Roundabout Geometry	Effective flare length is over 30m, which is outside the normal range. Treat capacities with increasing caution.

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	Site Access	Standard Roundabout		1, 2, 3, 4	4.80	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description
1	Newgate Lane North	
2	Site Access East	
3	Newgate Lane South	
4	Newgate Lane West (Connection)	

Roundabout Geometry

Arm	V - Approach road half-width (m)	E - Entry width (m)	I' - Effective flare length (m)	R - Entry radius (m)	D - Inscribed circle diameter (m)	PHI - Conflict (entry) angle (deg)	Exit only
1 - Newgate Lane North	3.65	8.00	69.0	25.0	45.0	15.4	
2 - Site Access East	3.00	7.12	13.3	28.0	45.0	17.3	
3 - Newgate Lane South	7.00	8.35	52.0	15.0	45.0	21.3	
4 - Newgate Lane West (Connection)	3.65	7.22	16.0	25.0	45.0	17.3	

Slope / Intercept / Capacity

Roundabout Slope and Intercept used in model

Arm	Final slope	Final intercept (PCU/TS)
1 - Newgate Lane North	0.770	583.911
2 - Site Access East	0.630	406.305
3 - Newgate Lane South	0.795	633.345
4 - Newgate Lane West (Connection)	0.669	457.648

The slope and intercept shown above include any corrections and adjustments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time period length (min)	Time segment length (min)
D1	2020 with CD + Development	AM	DIRECT	07:15	08:15	60	15

Vehicle mix source	PCU Factor for a HV (PCU)	O-D data varies over time
HV Percentages	2.00	✓

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Scaling Factor (%)
1 - Newgate Lane North		✓	100.000
2 - Site Access East		✓	100.000
3 - Newgate Lane South		✓	100.000
4 - Newgate Lane West (Connection)		✓	100.000

Origin-Destination Data

Demand (Veh/TS)

07:15 -
07:30

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0.00	4.00	195.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	428.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	6.00	0.00

Demand (Veh/TS)

07:30 -
07:45

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0.00	4.00	247.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	380.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	6.00	0.00

Demand (Veh/TS)

07:45 -
08:00

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0.00	4.00	258.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	428.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

Demand (Veh/TS)

08:00 -
08:15

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0.00	4.00	179.00	5.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	385.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

Vehicle Mix

Heavy Vehicle Percentages

	To				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0	0	6	4
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	3	0	0	6
	4 - Newgate Lane West (Connection)	11	0	0	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (Veh)	Max LOS
1 - Newgate Lane North	0.49	3.27	1.0	A
2 - Site Access East	0.18	4.87	0.2	A
3 - Newgate Lane South	0.73	5.61	2.7	A
4 - Newgate Lane West (Connection)	0.08	6.93	0.1	A

Main Results for each time segment

07:15 - 07:30

Arm	Total Demand (Veh/TS)	Circulating flow (Veh/TS)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	End queue (Veh)	Delay (s)	Unsignalised level of service
1 - Newgate Lane North	205.00	10.92	543.83	0.377	204.40	0.6	2.647	A
2 - Site Access East	41.00	206.36	268.70	0.153	40.82	0.2	3.943	A
3 - Newgate Lane South	437.00	22.91	597.08	0.732	434.33	2.7	5.445	A
4 - Newgate Lane West (Connection)	11.00	447.28	142.63	0.077	10.92	0.1	6.828	A

07:30 - 07:45

Arm	Total Demand (Veh/TS)	Circulating flow (Veh/TS)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	End queue (Veh)	Delay (s)	Unsignalised level of service
1 - Newgate Lane North	257.00	11.01	543.58	0.473	256.71	0.9	3.134	A
2 - Site Access East	41.00	258.72	233.72	0.175	40.97	0.2	4.669	A
3 - Newgate Lane South	390.00	22.98	596.98	0.653	390.76	1.9	4.380	A
4 - Newgate Lane West (Connection)	11.00	402.75	171.87	0.064	11.01	0.1	5.597	A

07:45 - 08:00

Arm	Total Demand (Veh/TS)	Circulating flow (Veh/TS)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	End queue (Veh)	Delay (s)	Unsignalised level of service
1 - Newgate Lane North	268.00	11.98	542.85	0.494	267.92	1.0	3.273	A
2 - Site Access East	41.00	270.91	225.61	0.182	40.99	0.2	4.874	A
3 - Newgate Lane South	438.00	23.00	596.97	0.734	437.21	2.7	5.605	A
4 - Newgate Lane West (Connection)	12.00	449.22	141.92	0.085	11.98	0.1	6.926	A

08:00 - 08:15

Arm	Total Demand (Veh/TS)	Circulating flow (Veh/TS)	Capacity (Veh/TS)	RFC	Throughput (Veh/TS)	End queue (Veh)	Delay (s)	Unsignalised level of service
1 - Newgate Lane North	188.00	11.02	543.78	0.346	188.44	0.5	2.535	A
2 - Site Access East	41.00	190.45	279.33	0.147	41.05	0.2	3.779	A
3 - Newgate Lane South	394.00	22.03	597.79	0.659	394.74	2.0	4.449	A
4 - Newgate Lane West (Connection)	10.00	407.74	169.56	0.059	10.03	0.1	5.642	A