



# 2020 with CD + Development , PM

## 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	4.19	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	16.00	330.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	230.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00



### Demand (Veh/TS)

16:15 -  
16:30

	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	16.00	347.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	279.00	24.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	16.00	357.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	250.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	16.00	325.00	5.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	225.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.68	5.11	2.1	A
2 - Site Access East	0.10	5.85	0.1	A
3 - Newgate Lane South	0.50	2.90	1.0	A
4 - Newgate Lane West (Connection)	0.05	3.82	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	352.00	30.91	554.92	0.634	350.29	1.7	4.363	A
2 - Site Access East	17.00	341.34	189.05	0.090	16.90	0.1	5.226	A
3 - Newgate Lane South	258.00	12.93	617.57	0.418	257.29	0.7	2.492	A
4 - Newgate Lane West (Connection)	13.00	260.26	281.94	0.046	12.95	0.0	3.345	A

### 16:15 - 16:30

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	369.00	30.99	554.84	0.665	368.76	2.0	4.829	A
2 - Site Access East	17.00	359.76	177.32	0.096	16.99	0.1	5.613	A
3 - Newgate Lane South	308.00	12.99	617.42	0.499	307.72	1.0	2.903	A
4 - Newgate Lane West (Connection)	13.00	309.73	248.50	0.052	12.99	0.1	3.820	A

### 16:30 - 16:45

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	379.00	31.01	554.81	0.683	378.83	2.1	5.108	A
2 - Site Access East	17.00	369.84	170.90	0.099	17.00	0.1	5.847	A
3 - Newgate Lane South	278.00	13.00	617.47	0.450	278.17	0.8	2.653	A
4 - Newgate Lane West (Connection)	13.00	281.16	267.81	0.049	13.00	0.1	3.534	A

### 16:45 - 17:00

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	346.00	31.01	554.83	0.624	346.45	1.7	4.328	A
2 - Site Access East	17.00	337.44	191.53	0.089	17.01	0.1	5.159	A
3 - Newgate Lane South	253.00	12.01	618.30	0.409	253.13	0.7	2.465	A
4 - Newgate Lane West (Connection)	12.00	256.13	284.73	0.042	12.01	0.0	3.299	A

# 2036 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	5.46	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	4.00	204.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	452.00	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	259.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	401.00	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	271.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	452.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	188.00	5.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	406.00	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				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	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	0.52	3.45	1.1	A
2 - Site Access East	0.19	5.13	0.2	A
3 - Newgate Lane South	0.77	6.56	3.3	A
4 - Newgate Lane West (Connection)	0.10	7.91	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	214.00	10.91	543.80	0.394	213.35	0.6	2.719	A
2 - Site Access East	41.00	215.31	262.72	0.156	40.82	0.2	4.052	A
3 - Newgate Lane South	461.00	22.91	597.08	0.772	457.72	3.3	6.318	A
4 - Newgate Lane West (Connection)	11.00	470.67	127.28	0.086	10.91	0.1	7.727	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	269.00	11.02	543.54	0.495	268.67	1.0	3.269	A
2 - Site Access East	41.00	270.69	225.72	0.182	40.96	0.2	4.869	A
3 - Newgate Lane South	411.00	22.98	596.98	0.688	412.04	2.2	4.893	A
4 - Newgate Lane West (Connection)	11.00	424.02	157.90	0.070	11.02	0.1	6.127	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	281.00	12.96	542.10	0.518	280.90	1.1	3.446	A
2 - Site Access East	41.00	284.88	216.31	0.190	40.99	0.2	5.133	A
3 - Newgate Lane South	462.00	22.99	596.97	0.774	460.93	3.3	6.560	A
4 - Newgate Lane West (Connection)	13.00	472.93	126.72	0.103	12.96	0.1	7.909	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	197.00	11.04	543.73	0.362	197.50	0.6	2.604	A
2 - Site Access East	41.00	199.52	273.27	0.150	41.06	0.2	3.876	A
3 - Newgate Lane South	415.00	22.03	597.79	0.694	416.01	2.3	4.978	A
4 - Newgate Lane West (Connection)	10.00	429.02	155.51	0.064	10.04	0.1	6.187	A

# 2036 with CD + Development , PM

## 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	4.59	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	16.00	347.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	241.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	16.00	364.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	293.00	24.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	16.00	375.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	262.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	16.00	342.00	5.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	236.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.72	5.71	2.5	A
2 - Site Access East	0.11	6.34	0.1	A
3 - Newgate Lane South	0.52	3.04	1.1	A
4 - Newgate Lane West (Connection)	0.06	4.00	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	369.00	31.90	554.15	0.666	367.04	2.0	4.761	A
2 - Site Access East	17.00	359.09	177.75	0.096	16.89	0.1	5.591	A
3 - Newgate Lane South	269.00	12.92	617.54	0.436	268.23	0.8	2.571	A
4 - Newgate Lane West (Connection)	14.00	271.20	274.54	0.051	13.95	0.1	3.453	A

### 16:15 - 16:30

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	386.00	31.98	554.07	0.697	385.70	2.3	5.335	A
2 - Site Access East	17.00	377.71	165.90	0.102	16.99	0.1	6.043	A
3 - Newgate Lane South	322.00	12.99	617.40	0.522	321.69	1.1	3.041	A
4 - Newgate Lane West (Connection)	14.00	323.69	239.06	0.059	13.99	0.1	3.998	A

### 16:30 - 16:45

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	397.00	32.01	554.03	0.717	396.77	2.5	5.712	A
2 - Site Access East	17.00	388.78	158.84	0.107	16.99	0.1	6.344	A
3 - Newgate Lane South	290.00	13.00	617.44	0.470	290.19	0.9	2.751	A
4 - Newgate Lane West (Connection)	14.00	293.19	259.68	0.054	14.00	0.1	3.662	A

### 16:45 - 17:00

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	363.00	32.01	554.05	0.655	363.55	1.9	4.738	A
2 - Site Access East	17.00	355.54	180.01	0.094	17.01	0.1	5.521	A
3 - Newgate Lane South	264.00	12.02	618.27	0.427	264.14	0.7	2.542	A
4 - Newgate Lane West (Connection)	13.00	267.15	277.28	0.047	13.01	0.0	3.407	A



# 2036 with CD + Development - Redistributed, 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	5.38	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D7	2036 with CD + Development - Redistributed	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				
	From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
		1 - Newgate Lane North	0.00	4.00	143.00	6.00
		2 - Site Access East	17.00	0.00	24.00	0.00
		3 - Newgate Lane South	452.00	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	182.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	401.00	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	190.00	6.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	452.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	132.00	5.00
	2 - Site Access East	17.00	0.00	24.00	0.00
	3 - Newgate Lane South	406.00	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				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	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	0.37	2.63	0.6	A
2 - Site Access East	0.15	3.92	0.2	A
3 - Newgate Lane South	0.77	6.56	3.3	A
4 - Newgate Lane West (Connection)	0.10	7.91	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	153.00	10.91	544.14	0.281	152.61	0.4	2.296	A
2 - Site Access East	41.00	154.57	303.32	0.135	40.84	0.2	3.427	A
3 - Newgate Lane South	461.00	22.92	597.07	0.772	457.72	3.3	6.319	A
4 - Newgate Lane West (Connection)	11.00	470.68	127.27	0.086	10.91	0.1	7.728	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	192.00	11.02	543.82	0.353	191.85	0.5	2.555	A
2 - Site Access East	41.00	193.86	277.06	0.148	40.98	0.2	3.811	A
3 - Newgate Lane South	411.00	22.99	596.97	0.688	412.04	2.2	4.895	A
4 - Newgate Lane West (Connection)	11.00	424.03	157.90	0.070	11.02	0.1	6.127	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	200.00	12.96	542.37	0.369	199.96	0.6	2.628	A
2 - Site Access East	41.00	203.93	270.40	0.152	40.99	0.2	3.922	A
3 - Newgate Lane South	462.00	23.00	596.97	0.774	460.93	3.3	6.560	A
4 - Newgate Lane West (Connection)	13.00	472.93	126.72	0.103	12.96	0.1	7.909	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	141.00	11.04	544.08	0.259	141.23	0.4	2.236	A
2 - Site Access East	41.00	143.26	310.86	0.132	41.03	0.2	3.334	A
3 - Newgate Lane South	415.00	22.02	597.80	0.694	416.01	2.3	4.980	A
4 - Newgate Lane West (Connection)	10.00	429.01	155.52	0.064	10.04	0.1	6.190	A

# 2036 with CD + Development - Redistributed, PM

## 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	3.23	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D8	2036 with CD + Development - Redistributed	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	16.00	243.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	241.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	16.00	255.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	293.00	24.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	16.00	262.00	6.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	262.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	16.00	239.00	5.00
	2 - Site Access East	7.00	0.00	10.00	0.00
	3 - Newgate Lane South	236.00	24.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.51	3.33	1.0	A
2 - Site Access East	0.07	4.21	0.1	A
3 - Newgate Lane South	0.52	3.04	1.1	A
4 - Newgate Lane West (Connection)	0.06	4.00	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	265.00	31.90	554.27	0.478	264.09	0.9	3.093	A
2 - Site Access East	17.00	256.11	243.32	0.070	16.93	0.1	3.974	A
3 - Newgate Lane South	269.00	12.95	617.52	0.436	268.23	0.8	2.571	A
4 - Newgate Lane West (Connection)	14.00	271.21	274.53	0.051	13.95	0.1	3.453	A

### 16:15 - 16:30

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	277.00	31.98	554.19	0.500	276.92	1.0	3.246	A
2 - Site Access East	17.00	268.91	235.17	0.072	17.00	0.1	4.124	A
3 - Newgate Lane South	322.00	13.00	617.40	0.522	321.69	1.1	3.041	A
4 - Newgate Lane West (Connection)	14.00	323.69	239.06	0.059	13.99	0.1	3.998	A

### 16:30 - 16:45

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	284.00	32.01	554.16	0.512	283.95	1.0	3.330	A
2 - Site Access East	17.00	275.95	230.69	0.074	17.00	0.1	4.211	A
3 - Newgate Lane South	290.00	13.00	617.44	0.470	290.19	0.9	2.753	A
4 - Newgate Lane West (Connection)	14.00	293.19	259.68	0.054	14.00	0.1	3.662	A

### 16:45 - 17:00

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	260.00	32.01	554.18	0.469	260.16	0.9	3.064	A
2 - Site Access East	17.00	252.15	245.83	0.069	17.00	0.1	3.932	A
3 - Newgate Lane South	264.00	12.01	618.28	0.427	264.14	0.7	2.541	A
4 - Newgate Lane West (Connection)	13.00	267.14	277.28	0.047	13.01	0.0	3.407	A

<b>Junctions 9</b>	
<b>ARCADY 9 - Roundabout Module</b>	
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	
<b>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</b>	

**Filename:** Site Access Roundabout 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\Access Strategy Note Modelling

**Report generation date:** 07/08/2020 09:38:39

- »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	D3	1.0	3.30	0.50	A	D4	2.2	5.34	0.70	A
2 - Site Access East		0.3	5.15	0.23	A		0.1	6.04	0.13	A
3 - Newgate Lane South		2.8	5.78	0.74	A		1.0	2.97	0.51	A
4 - Newgate Lane West (Connection)		0.1	7.14	0.09	A		0.1	3.90	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D9	1.1	3.47	0.52	A	D10	2.6	6.01	0.73	A
2 - Site Access East		0.3	5.44	0.24	A		0.2	6.57	0.14	A
3 - Newgate Lane South		3.5	6.80	0.78	A		1.1	3.11	0.53	A
4 - Newgate Lane West (Connection)		0.1	8.18	0.11	A		0.1	4.08	0.06	A
	2036 with CD + Development - Redistributed									
1 - Newgate Lane North	D11	0.6	2.65	0.37	A	D12	1.1	3.43	0.52	A
2 - Site Access East		0.2	4.10	0.19	A		0.1	4.31	0.10	A
3 - Newgate Lane South		3.5	6.80	0.78	A		1.1	3.11	0.53	A
4 - Newgate Lane West (Connection)		0.1	8.18	0.11	A		0.1	4.08	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

<b>Title</b>	(untitled)
<b>Location</b>	
<b>Site number</b>	
<b>Date</b>	05/01/2018
<b>Version</b>	
<b>Status</b>	(new file)
<b>Identifier</b>	
<b>Client</b>	
<b>Jobnumber</b>	
<b>Enumerator</b>	I-TRANSPORT\Hotdesk
<b>Description</b>	

## 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)
D3	2020 with CD + Development	AM	DIRECT	07:15	08:15	60	15
D4	2020 with CD + Development	PM	DIRECT	16:00	17:00	60	15
D9	2036 with CD + Development	AM	DIRECT	07:15	08:15	60	15
D10	2036 with CD + Development	PM	DIRECT	16:00	17:00	60	15
D11	2036 with CD + Development - Redistributed	AM	DIRECT	07:15	08:15	60	15
D12	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	4.94	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)
D3	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	5.00	195.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	428.00	7.00	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	5.00	247.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	380.00	7.00	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	5.00	258.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	428.00	7.00	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	5.00	179.00	5.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	385.00	7.00	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	0.50	3.30	1.0	A
2 - Site Access East	0.23	5.15	0.3	A
3 - Newgate Lane South	0.74	5.78	2.8	A
4 - Newgate Lane West (Connection)	0.09	7.14	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	206.00	12.91	542.53	0.380	205.39	0.6	2.665	A
2 - Site Access East	51.00	206.36	268.71	0.190	50.77	0.2	4.125	A
3 - Newgate Lane South	439.00	26.89	594.09	0.739	436.24	2.8	5.607	A
4 - Newgate Lane West (Connection)	11.00	453.16	138.88	0.079	10.91	0.1	7.028	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	258.00	13.02	542.24	0.476	257.71	0.9	3.160	A
2 - Site Access East	51.00	258.72	233.72	0.218	50.96	0.3	4.923	A
3 - Newgate Lane South	392.00	26.98	593.98	0.660	392.79	2.0	4.490	A
4 - Newgate Lane West (Connection)	11.00	408.78	168.03	0.065	11.01	0.1	5.731	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	269.00	13.97	541.51	0.497	268.92	1.0	3.301	A
2 - Site Access East	51.00	270.91	225.61	0.226	50.99	0.3	5.153	A
3 - Newgate Lane South	440.00	26.99	593.97	0.741	439.18	2.8	5.783	A
4 - Newgate Lane West (Connection)	12.00	455.18	138.11	0.087	11.98	0.1	7.135	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	189.00	13.02	542.48	0.348	189.44	0.5	2.551	A
2 - Site Access East	51.00	190.46	279.32	0.183	51.07	0.2	3.943	A
3 - Newgate Lane South	396.00	26.03	594.79	0.666	396.77	2.0	4.562	A
4 - Newgate Lane West (Connection)	10.00	413.79	165.68	0.060	10.03	0.1	5.782	A



# 2020 with CD + Development , PM

## 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	4.36	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

	To				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	20.00	330.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	230.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	20.00	347.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	279.00	29.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	20.00	357.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	250.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	20.00	325.00	5.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	225.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.70	5.34	2.2	A
2 - Site Access East	0.13	6.04	0.1	A
3 - Newgate Lane South	0.51	2.97	1.0	A
4 - Newgate Lane West (Connection)	0.05	3.90	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	356.00	35.89	551.17	0.646	354.20	1.8	4.529	A
2 - Site Access East	22.00	341.28	189.09	0.116	21.87	0.1	5.382	A
3 - Newgate Lane South	263.00	14.92	616.10	0.427	262.26	0.7	2.538	A
4 - Newgate Lane West (Connection)	13.00	267.22	277.28	0.047	12.95	0.0	3.404	A

### 16:15 - 16:30

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	373.00	35.98	551.09	0.677	372.74	2.1	5.037	A
2 - Site Access East	22.00	359.74	177.33	0.124	21.99	0.1	5.793	A
3 - Newgate Lane South	313.00	14.99	615.94	0.508	312.72	1.0	2.965	A
4 - Newgate Lane West (Connection)	13.00	316.72	243.82	0.053	12.99	0.1	3.898	A

### 16:30 - 16:45

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	383.00	36.01	551.06	0.695	382.82	2.2	5.342	A
2 - Site Access East	22.00	369.83	170.91	0.129	21.99	0.1	6.043	A
3 - Newgate Lane South	283.00	15.00	615.99	0.459	283.17	0.9	2.707	A
4 - Newgate Lane West (Connection)	13.00	288.17	263.12	0.049	13.00	0.1	3.597	A

### 16:45 - 17:00

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	350.00	36.01	551.07	0.635	350.48	1.8	4.499	A
2 - Site Access East	22.00	337.47	191.51	0.115	22.02	0.1	5.309	A
3 - Newgate Lane South	258.00	14.02	616.83	0.418	258.13	0.7	2.511	A
4 - Newgate Lane West (Connection)	12.00	263.14	280.04	0.043	12.01	0.0	3.359	A

# 2036 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	5.63	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D9	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	5.00	204.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	452.00	7.00	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	5.00	259.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	401.00	7.00	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	5.00	271.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	452.00	7.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	5.00	188.00	5.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	406.00	7.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	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	0.52	3.47	1.1	A
2 - Site Access East	0.24	5.44	0.3	A
3 - Newgate Lane South	0.78	6.80	3.5	A
4 - Newgate Lane West (Connection)	0.11	8.18	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	215.00	12.90	542.49	0.396	214.35	0.7	2.736	A
2 - Site Access East	51.00	215.31	262.73	0.194	50.76	0.2	4.242	A
3 - Newgate Lane South	463.00	26.88	594.08	0.779	459.58	3.4	6.535	A
4 - Newgate Lane West (Connection)	11.00	476.51	123.56	0.089	10.90	0.1	7.983	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	270.00	13.02	542.20	0.498	269.67	1.0	3.297	A
2 - Site Access East	51.00	270.68	225.73	0.226	50.95	0.3	5.148	A
3 - Newgate Lane South	413.00	26.98	593.99	0.695	414.10	2.3	5.035	A
4 - Newgate Lane West (Connection)	11.00	430.07	154.05	0.071	11.02	0.1	6.295	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	282.00	14.96	540.76	0.521	281.90	1.1	3.474	A
2 - Site Access East	51.00	284.87	216.32	0.236	50.98	0.3	5.443	A
3 - Newgate Lane South	464.00	26.99	593.96	0.781	462.86	3.5	6.802	A
4 - Newgate Lane West (Connection)	13.00	478.87	122.91	0.106	12.96	0.1	8.183	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	198.00	13.04	542.42	0.365	198.50	0.6	2.620	A
2 - Site Access East	51.00	199.53	273.26	0.187	51.08	0.2	4.051	A
3 - Newgate Lane South	417.00	26.04	594.78	0.701	418.07	2.4	5.125	A
4 - Newgate Lane West (Connection)	10.00	435.08	151.63	0.066	10.05	0.1	6.360	A

# 2036 with CD + Development, PM

## 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

## 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)
D10	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

	To				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	20.00	347.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	241.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	20.00	364.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	293.00	29.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	20.00	375.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	262.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	20.00	342.00	5.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	236.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.73	6.01	2.6	A
2 - Site Access East	0.14	6.57	0.2	A
3 - Newgate Lane South	0.53	3.11	1.1	A
4 - Newgate Lane West (Connection)	0.06	4.08	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	373.00	36.88	550.40	0.678	370.93	2.1	4.959	A
2 - Site Access East	22.00	359.01	177.80	0.124	21.86	0.1	5.766	A
3 - Newgate Lane South	274.00	14.91	616.08	0.445	273.20	0.8	2.620	A
4 - Newgate Lane West (Connection)	14.00	278.16	269.88	0.052	13.95	0.1	3.516	A

### 16:15 - 16:30

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	390.00	36.98	550.31	0.709	389.68	2.4	5.589	A
2 - Site Access East	22.00	377.69	165.91	0.133	21.99	0.2	6.253	A
3 - Newgate Lane South	327.00	14.99	615.91	0.531	326.67	1.1	3.109	A
4 - Newgate Lane West (Connection)	14.00	330.67	234.39	0.060	13.99	0.1	4.083	A

### 16:30 - 16:45

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	401.00	37.01	550.27	0.729	400.76	2.6	6.007	A
2 - Site Access East	22.00	388.77	158.86	0.138	21.99	0.2	6.575	A
3 - Newgate Lane South	295.00	14.99	615.96	0.479	295.20	0.9	2.807	A
4 - Newgate Lane West (Connection)	14.00	300.19	254.99	0.055	14.00	0.1	3.733	A

### 16:45 - 17:00

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	367.00	37.01	550.29	0.667	367.60	2.0	4.944	A
2 - Site Access East	22.00	355.58	179.98	0.122	22.02	0.1	5.697	A
3 - Newgate Lane South	269.00	14.02	616.79	0.436	269.15	0.8	2.589	A
4 - Newgate Lane West (Connection)	13.00	274.16	272.59	0.048	13.01	0.1	3.469	A

# 2036 with CD + Development - Redistributed, 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	5.54	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D11	2036 with CD + Development - Redistributed	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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	5.00	143.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	452.00	7.00	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	5.00	182.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	401.00	7.00	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	5.00	190.00	6.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	452.00	7.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	5.00	132.00	5.00
	2 - Site Access East	21.00	0.00	30.00	0.00
	3 - Newgate Lane South	406.00	7.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	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	0.37	2.65	0.6	A
2 - Site Access East	0.19	4.10	0.2	A
3 - Newgate Lane South	0.78	6.80	3.5	A
4 - Newgate Lane West (Connection)	0.11	8.18	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	154.00	12.90	542.89	0.284	153.61	0.4	2.310	A
2 - Site Access East	51.00	154.56	303.32	0.168	50.80	0.2	3.560	A
3 - Newgate Lane South	463.00	26.90	594.07	0.779	459.58	3.4	6.535	A
4 - Newgate Lane West (Connection)	11.00	476.53	123.55	0.089	10.90	0.1	7.984	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	193.00	13.02	542.52	0.356	192.85	0.5	2.572	A
2 - Site Access East	51.00	193.86	277.06	0.184	50.98	0.2	3.980	A
3 - Newgate Lane South	413.00	26.99	593.98	0.695	414.10	2.3	5.033	A
4 - Newgate Lane West (Connection)	11.00	430.08	154.04	0.071	11.02	0.1	6.292	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	201.00	14.96	541.06	0.371	200.96	0.6	2.646	A
2 - Site Access East	51.00	203.93	270.41	0.189	50.99	0.2	4.101	A
3 - Newgate Lane South	464.00	27.00	593.96	0.781	462.86	3.5	6.802	A
4 - Newgate Lane West (Connection)	13.00	478.87	122.91	0.106	12.96	0.1	8.183	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	142.00	13.04	542.83	0.262	142.23	0.4	2.249	A
2 - Site Access East	51.00	143.26	310.86	0.164	51.03	0.2	3.463	A
3 - Newgate Lane South	417.00	26.02	594.80	0.701	418.07	2.4	5.125	A
4 - Newgate Lane West (Connection)	10.00	435.07	151.64	0.066	10.05	0.1	6.360	A



# 2036 with CD + Development - Redistributed, PM

## 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	3.32	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D12	2036 with CD + Development - Redistributed	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

	To				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	20.00	243.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	241.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	20.00	255.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	293.00	29.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	20.00	262.00	6.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	262.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	20.00	239.00	5.00
	2 - Site Access East	9.00	0.00	13.00	0.00
	3 - Newgate Lane South	236.00	29.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.52	3.43	1.1	A
2 - Site Access East	0.10	4.31	0.1	A
3 - Newgate Lane South	0.53	3.11	1.1	A
4 - Newgate Lane West (Connection)	0.06	4.08	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	269.00	36.88	550.55	0.489	268.05	0.9	3.175	A
2 - Site Access East	22.00	256.09	243.33	0.090	21.90	0.1	4.062	A
3 - Newgate Lane South	274.00	14.94	616.05	0.445	273.20	0.8	2.620	A
4 - Newgate Lane West (Connection)	14.00	278.17	269.87	0.052	13.95	0.1	3.516	A

### 16:15 - 16:30

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	281.00	36.98	550.45	0.510	280.91	1.0	3.339	A
2 - Site Access East	22.00	268.91	235.17	0.094	22.00	0.1	4.221	A
3 - Newgate Lane South	327.00	15.00	615.91	0.531	326.67	1.1	3.109	A
4 - Newgate Lane West (Connection)	14.00	330.68	234.38	0.060	13.99	0.1	4.083	A

### 16:30 - 16:45

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	288.00	37.01	550.41	0.523	287.94	1.1	3.428	A
2 - Site Access East	22.00	275.95	230.69	0.095	22.00	0.1	4.312	A
3 - Newgate Lane South	295.00	15.00	615.96	0.479	295.20	0.9	2.809	A
4 - Newgate Lane West (Connection)	14.00	300.19	254.99	0.055	14.00	0.1	3.736	A

### 16:45 - 17:00

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	264.00	37.01	550.44	0.480	264.16	0.9	3.144	A
2 - Site Access East	22.00	252.16	245.83	0.089	22.01	0.1	4.022	A
3 - Newgate Lane South	269.00	14.01	616.80	0.436	269.15	0.8	2.591	A
4 - Newgate Lane West (Connection)	13.00	274.15	272.59	0.048	13.01	0.1	3.466	A

## **APPENDIX D. SENSITIVITY TEST ASSESSMENTS**

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 - Sensitivity Test S1 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\525 Dwellings

**Report generation date:** 07/08/2020 09:54:20

»2020 with CD + Development , AM

»2020 with CD + Development , PM

»2036 with CD + Development , AM

»2036 with CD + Development , 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	3.30	0.50	A	D2	2.4	5.47	0.71	A
2 - Site Access East		0.3	5.15	0.23	A		0.1	6.00	0.12	A
3 - Newgate Lane South		2.9	6.14	0.75	A		0.9	2.86	0.49	A
4 - Newgate Lane West (Connection)		0.1	7.63	0.09	A		0.1	3.79	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.47	0.52	A	D4	2.8	6.16	0.74	A
2 - Site Access East		0.3	5.44	0.24	A		0.2	6.53	0.13	A
3 - Newgate Lane South		3.7	7.30	0.79	A		1.0	2.99	0.51	A
4 - Newgate Lane West (Connection)		0.1	8.85	0.11	A		0.1	3.96	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

## 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	5.14	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	8.00	195.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	428.00	3.00	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	8.00	247.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	380.00	3.00	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	8.00	258.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	428.00	3.00	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	8.00	179.00	5.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	385.00	3.00	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	0.50	3.30	1.0	A
2 - Site Access East	0.23	5.15	0.3	A
3 - Newgate Lane South	0.75	6.14	2.9	A
4 - Newgate Lane West (Connection)	0.09	7.63	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	209.00	8.93	545.85	0.383	208.38	0.6	2.662	A
2 - Site Access East	51.00	206.36	268.71	0.190	50.77	0.2	4.125	A
3 - Newgate Lane South	435.00	43.81	580.87	0.749	432.10	2.9	5.940	A
4 - Newgate Lane West (Connection)	11.00	465.95	130.74	0.084	10.91	0.1	7.506	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	261.00	9.01	545.50	0.478	260.71	0.9	3.157	A
2 - Site Access East	51.00	258.72	233.72	0.218	50.96	0.3	4.923	A
3 - Newgate Lane South	388.00	43.96	580.71	0.668	388.86	2.0	4.713	A
4 - Newgate Lane West (Connection)	11.00	421.83	159.71	0.069	11.02	0.1	6.055	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	272.00	9.98	544.75	0.499	271.92	1.0	3.298	A
2 - Site Access East	51.00	270.90	225.61	0.226	50.99	0.3	5.153	A
3 - Newgate Lane South	436.00	43.99	580.69	0.751	435.11	2.9	6.141	A
4 - Newgate Lane West (Connection)	12.00	468.11	129.84	0.092	11.97	0.1	7.633	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	192.00	9.02	545.86	0.352	192.45	0.5	2.551	A
2 - Site Access East	51.00	190.46	279.32	0.183	51.07	0.2	3.945	A
3 - Newgate Lane South	392.00	43.06	581.48	0.674	392.83	2.1	4.793	A
4 - Newgate Lane West (Connection)	10.00	426.87	157.29	0.064	10.03	0.1	6.114	A



# 2020 with CD + Development , PM

## 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	4.44	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	37.00	330.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	230.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	37.00	347.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	279.00	12.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	37.00	357.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	250.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	37.00	325.00	5.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	225.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.71	5.47	2.4	A
2 - Site Access East	0.12	6.00	0.1	A
3 - Newgate Lane South	0.49	2.86	0.9	A
4 - Newgate Lane West (Connection)	0.05	3.79	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	373.00	18.94	564.34	0.661	371.08	1.9	4.613	A
2 - Site Access East	21.00	341.24	189.11	0.111	20.88	0.1	5.346	A
3 - Newgate Lane South	246.00	21.87	610.26	0.403	245.33	0.7	2.462	A
4 - Newgate Lane West (Connection)	13.00	257.24	283.95	0.046	12.95	0.0	3.320	A

### 16:15 - 16:30

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	390.00	18.99	564.27	0.691	389.72	2.2	5.147	A
2 - Site Access East	21.00	359.73	177.34	0.118	20.99	0.1	5.756	A
3 - Newgate Lane South	296.00	21.99	610.12	0.485	295.73	0.9	2.860	A
4 - Newgate Lane West (Connection)	13.00	306.73	250.50	0.052	12.99	0.1	3.788	A

### 16:30 - 16:45

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	400.00	19.00	564.25	0.709	399.81	2.4	5.466	A
2 - Site Access East	21.00	369.82	170.91	0.123	20.99	0.1	6.002	A
3 - Newgate Lane South	266.00	21.99	610.13	0.436	266.16	0.8	2.619	A
4 - Newgate Lane West (Connection)	13.00	278.15	269.82	0.048	13.00	0.1	3.503	A

### 16:45 - 17:00

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	367.00	19.00	564.28	0.650	367.51	1.9	4.587	A
2 - Site Access East	21.00	337.48	191.50	0.110	21.02	0.1	5.281	A
3 - Newgate Lane South	241.00	21.02	610.93	0.394	241.12	0.7	2.435	A
4 - Newgate Lane West (Connection)	12.00	253.13	286.73	0.042	12.01	0.0	3.275	A

# 2036 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	5.92	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	8.00	204.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	452.00	3.00	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	8.00	259.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	401.00	3.00	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	8.00	271.00	6.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	452.00	3.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	8.00	188.00	5.00
	2 - Site Access East	38.00	0.00	13.00	0.00
	3 - Newgate Lane South	406.00	3.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	6	5
	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	0.52	3.47	1.1	A
2 - Site Access East	0.24	5.44	0.3	A
3 - Newgate Lane South	0.79	7.30	3.7	A
4 - Newgate Lane West (Connection)	0.11	8.85	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	218.00	8.92	545.66	0.400	217.34	0.7	2.735	A
2 - Site Access East	51.00	215.30	262.69	0.194	50.76	0.2	4.242	A
3 - Newgate Lane South	459.00	43.80	580.83	0.790	455.37	3.6	6.985	A
4 - Newgate Lane West (Connection)	11.00	489.22	115.46	0.095	10.90	0.1	8.597	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	273.00	9.02	545.33	0.501	272.67	1.0	3.296	A
2 - Site Access East	51.00	270.68	225.69	0.226	50.95	0.3	5.149	A
3 - Newgate Lane South	409.00	43.96	580.67	0.704	410.20	2.4	5.318	A
4 - Newgate Lane West (Connection)	11.00	443.16	145.70	0.076	11.02	0.1	6.685	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	285.00	10.96	543.87	0.524	284.90	1.1	3.473	A
2 - Site Access East	51.00	284.87	216.28	0.236	50.98	0.3	5.444	A
3 - Newgate Lane South	460.00	43.99	580.66	0.792	458.75	3.7	7.303	A
4 - Newgate Lane West (Connection)	13.00	491.75	114.64	0.113	12.96	0.1	8.847	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	201.00	9.04	545.65	0.368	201.51	0.6	2.618	A
2 - Site Access East	51.00	199.53	273.23	0.187	51.08	0.2	4.052	A
3 - Newgate Lane South	413.00	43.07	581.44	0.710	414.18	2.5	5.418	A
4 - Newgate Lane West (Connection)	10.00	448.22	143.21	0.070	10.05	0.1	6.763	A



# 2036 with CD + Development , PM

## 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	4.90	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	37.00	347.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	241.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	37.00	364.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	293.00	12.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	37.00	375.00	6.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	262.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	37.00	342.00	5.00
	2 - Site Access East	16.00	0.00	5.00	0.00
	3 - Newgate Lane South	236.00	12.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.74	6.16	2.8	A
2 - Site Access East	0.13	6.53	0.2	A
3 - Newgate Lane South	0.51	2.99	1.0	A
4 - Newgate Lane West (Connection)	0.06	3.96	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	390.00	19.94	563.55	0.692	387.79	2.2	5.059	A
2 - Site Access East	21.00	358.97	177.83	0.118	20.87	0.1	5.729	A
3 - Newgate Lane South	257.00	21.86	610.25	0.421	256.28	0.7	2.537	A
4 - Newgate Lane West (Connection)	14.00	268.19	276.56	0.051	13.95	0.1	3.427	A

### 16:15 - 16:30

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	407.00	19.99	563.49	0.722	406.66	2.5	5.723	A
2 - Site Access East	21.00	377.67	165.92	0.127	20.99	0.1	6.209	A
3 - Newgate Lane South	310.00	21.99	610.11	0.508	309.70	1.0	2.993	A
4 - Newgate Lane West (Connection)	14.00	320.69	241.06	0.058	13.99	0.1	3.963	A

### 16:30 - 16:45

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	418.00	20.01	563.46	0.742	417.74	2.8	6.162	A
2 - Site Access East	21.00	388.76	158.86	0.132	20.99	0.2	6.527	A
3 - Newgate Lane South	278.00	21.99	610.12	0.456	278.19	0.8	2.714	A
4 - Newgate Lane West (Connection)	14.00	290.17	261.69	0.054	14.00	0.1	3.632	A

### 16:45 - 17:00

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	384.00	20.01	563.49	0.681	384.64	2.2	5.050	A
2 - Site Access East	21.00	355.60	179.97	0.117	21.02	0.1	5.664	A
3 - Newgate Lane South	252.00	21.03	610.91	0.413	252.14	0.7	2.509	A
4 - Newgate Lane West (Connection)	13.00	264.15	279.29	0.047	13.01	0.0	3.381	A

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 - Sensitivity Test S2 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\525 Dwellings

**Report generation date:** 07/08/2020 09:55:32

»2020 with CD + Development , AM  
»2020 with CD + Development , PM  
»2036 with CD + Development , AM  
»2036 with CD + Development , 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	3.30	0.50	A	D2	2.5	5.52	0.71	A
2 - Site Access East		0.3	5.15	0.23	A		0.1	6.00	0.12	A
3 - Newgate Lane South		3.0	6.32	0.76	A		0.9	2.82	0.48	A
4 - Newgate Lane West (Connection)		0.1	7.89	0.10	A		0.1	3.75	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.48	0.53	A	D4	2.9	6.23	0.75	A
2 - Site Access East		0.3	5.44	0.24	A		0.2	6.53	0.13	A
3 - Newgate Lane South		3.8	7.56	0.80	A		1.0	2.95	0.50	A
4 - Newgate Lane West (Connection)		0.1	9.19	0.12	A		0.1	3.92	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

## 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	5.24	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	10.00	195.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	428.00	1.00	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	10.00	247.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	380.00	1.00	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	10.00	258.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	428.00	1.00	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	10.00	179.00	5.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	385.00	1.00	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	0.50	3.30	1.0	A
2 - Site Access East	0.23	5.15	0.3	A
3 - Newgate Lane South	0.76	6.32	3.0	A
4 - Newgate Lane West (Connection)	0.10	7.89	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	211.00	6.94	547.58	0.385	210.38	0.6	2.665	A
2 - Site Access East	51.00	206.35	268.71	0.190	50.77	0.2	4.125	A
3 - Newgate Lane South	433.00	51.77	574.65	0.754	430.03	3.0	6.104	A
4 - Newgate Lane West (Connection)	11.00	471.84	126.98	0.087	10.91	0.1	7.747	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	263.00	7.01	547.18	0.481	262.70	0.9	3.161	A
2 - Site Access East	51.00	258.72	233.72	0.218	50.96	0.3	4.923	A
3 - Newgate Lane South	386.00	51.96	574.45	0.672	386.89	2.1	4.822	A
4 - Newgate Lane West (Connection)	11.00	427.85	155.87	0.071	11.02	0.1	6.213	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	274.00	7.98	546.42	0.501	273.92	1.0	3.302	A
2 - Site Access East	51.00	270.90	225.61	0.226	50.99	0.3	5.153	A
3 - Newgate Lane South	434.00	51.99	574.45	0.756	433.07	3.0	6.322	A
4 - Newgate Lane West (Connection)	12.00	474.07	126.02	0.095	11.97	0.1	7.889	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	194.00	7.02	547.62	0.354	194.45	0.6	2.553	A
2 - Site Access East	51.00	190.46	279.32	0.183	51.07	0.2	3.945	A
3 - Newgate Lane South	390.00	51.07	575.22	0.678	390.87	2.1	4.905	A
4 - Newgate Lane West (Connection)	10.00	432.91	153.42	0.065	10.03	0.1	6.280	A





# 2020 with CD + Development , PM

## 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	4.48	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	44.00	330.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	230.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	44.00	347.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	279.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	44.00	357.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	250.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	44.00	325.00	5.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	225.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.71	5.52	2.5	A
2 - Site Access East	0.12	6.00	0.1	A
3 - Newgate Lane South	0.48	2.82	0.9	A
4 - Newgate Lane West (Connection)	0.05	3.75	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	380.00	11.96	569.76	0.667	378.03	2.0	4.648	A
2 - Site Access East	21.00	341.23	189.12	0.111	20.88	0.1	5.346	A
3 - Newgate Lane South	239.00	24.86	607.75	0.393	238.36	0.6	2.432	A
4 - Newgate Lane West (Connection)	13.00	253.25	286.62	0.045	12.95	0.0	3.288	A

### 16:15 - 16:30

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	397.00	11.99	569.70	0.697	396.71	2.3	5.192	A
2 - Site Access East	21.00	359.73	177.34	0.118	20.99	0.1	5.756	A
3 - Newgate Lane South	289.00	24.99	607.62	0.476	288.74	0.9	2.819	A
4 - Newgate Lane West (Connection)	13.00	302.74	253.17	0.051	12.99	0.1	3.746	A

### 16:30 - 16:45

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	407.00	12.00	569.68	0.714	406.80	2.5	5.516	A
2 - Site Access East	21.00	369.82	170.91	0.123	20.99	0.1	6.002	A
3 - Newgate Lane South	259.00	24.99	607.62	0.426	259.16	0.7	2.583	A
4 - Newgate Lane West (Connection)	13.00	274.15	272.50	0.048	13.00	0.1	3.470	A

### 16:45 - 17:00

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	374.00	12.00	569.72	0.656	374.52	1.9	4.624	A
2 - Site Access East	21.00	337.49	191.50	0.110	21.02	0.1	5.281	A
3 - Newgate Lane South	234.00	24.02	608.40	0.385	234.12	0.6	2.406	A
4 - Newgate Lane West (Connection)	12.00	249.13	289.41	0.041	12.01	0.0	3.246	A

# 2036 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	6.06	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	10.00	204.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	452.00	1.00	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	10.00	259.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	401.00	1.00	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	10.00	271.00	6.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	452.00	1.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	10.00	188.00	5.00
	2 - Site Access East	46.00	0.00	5.00	0.00
	3 - Newgate Lane South	406.00	1.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	6	5
	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	0.53	3.48	1.1	A
2 - Site Access East	0.24	5.44	0.3	A
3 - Newgate Lane South	0.80	7.56	3.8	A
4 - Newgate Lane West (Connection)	0.12	9.19	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	220.00	6.93	547.37	0.402	219.33	0.7	2.737	A
2 - Site Access East	51.00	215.30	262.69	0.194	50.76	0.2	4.242	A
3 - Newgate Lane South	457.00	51.77	574.62	0.795	453.26	3.7	7.211	A
4 - Newgate Lane West (Connection)	11.00	495.08	111.73	0.098	10.89	0.1	8.917	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	275.00	7.01	547.00	0.503	274.66	1.0	3.300	A
2 - Site Access East	51.00	270.68	225.69	0.226	50.95	0.3	5.149	A
3 - Newgate Lane South	407.00	51.95	574.42	0.709	408.26	2.5	5.458	A
4 - Newgate Lane West (Connection)	11.00	449.21	141.85	0.078	11.02	0.1	6.879	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	287.00	8.96	545.53	0.526	286.90	1.1	3.477	A
2 - Site Access East	51.00	284.87	216.28	0.236	50.98	0.3	5.444	A
3 - Newgate Lane South	458.00	51.98	574.41	0.797	456.69	3.8	7.557	A
4 - Newgate Lane West (Connection)	13.00	497.69	110.83	0.117	12.95	0.1	9.192	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	203.00	7.04	547.40	0.371	203.51	0.6	2.620	A
2 - Site Access East	51.00	199.54	273.23	0.187	51.08	0.2	4.052	A
3 - Newgate Lane South	411.00	51.08	575.17	0.715	412.23	2.6	5.564	A
4 - Newgate Lane West (Connection)	10.00	454.28	139.32	0.072	10.05	0.1	6.967	A

# 2036 with CD + Development , PM

## 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	4.95	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	44.00	347.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	241.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00



### Demand (Veh/TS)

16:15 -  
16:30

	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	44.00	364.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	293.00	5.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	44.00	375.00	6.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	262.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	44.00	342.00	5.00
	2 - Site Access East	19.00	0.00	2.00	0.00
	3 - Newgate Lane South	236.00	5.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.75	6.23	2.9	A
2 - Site Access East	0.13	6.53	0.2	A
3 - Newgate Lane South	0.50	2.95	1.0	A
4 - Newgate Lane West (Connection)	0.06	3.92	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	397.00	12.96	568.96	0.698	394.73	2.3	5.102	A
2 - Site Access East	21.00	358.96	177.84	0.118	20.87	0.1	5.728	A
3 - Newgate Lane South	250.00	24.85	607.74	0.411	249.30	0.7	2.507	A
4 - Newgate Lane West (Connection)	14.00	264.19	279.23	0.050	13.95	0.1	3.392	A

### 16:15 - 16:30

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	414.00	12.99	568.91	0.728	413.65	2.6	5.782	A
2 - Site Access East	21.00	377.67	165.92	0.127	20.99	0.1	6.209	A
3 - Newgate Lane South	303.00	24.99	607.61	0.499	302.71	1.0	2.949	A
4 - Newgate Lane West (Connection)	14.00	316.70	243.74	0.057	13.99	0.1	3.917	A

### 16:30 - 16:45

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	425.00	13.00	568.88	0.747	424.73	2.9	6.227	A
2 - Site Access East	21.00	388.75	158.86	0.132	20.99	0.2	6.527	A
3 - Newgate Lane South	271.00	24.99	607.61	0.446	271.18	0.8	2.678	A
4 - Newgate Lane West (Connection)	14.00	286.17	264.38	0.053	14.00	0.1	3.593	A

### 16:45 - 17:00

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	391.00	13.00	568.92	0.687	391.65	2.2	5.096	A
2 - Site Access East	21.00	355.61	179.96	0.117	21.02	0.1	5.662	A
3 - Newgate Lane South	245.00	24.03	608.39	0.403	245.13	0.7	2.479	A
4 - Newgate Lane West (Connection)	13.00	260.15	281.96	0.046	13.01	0.0	3.348	A

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 - Sensitivity Test S3 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\525 Dwellings

**Report generation date:** 07/08/2020 09:57:04

- »2020 with CD + Development , AM
- »2020 with CD + Development , PM
- »2036 with CD + Development , AM
- »2036 with CD + Development , 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	3.31	0.50	A	D2	2.4	5.63	0.71	A
2 - Site Access East		0.4	5.47	0.27	A		0.2	6.21	0.15	A
3 - Newgate Lane South		2.9	5.93	0.75	A		1.1	3.04	0.52	A
4 - Newgate Lane West (Connection)		0.1	7.32	0.09	A		0.1	3.99	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.49	0.52	A	D4	2.8	6.37	0.74	A
2 - Site Access East		0.4	5.79	0.28	A		0.2	6.77	0.16	A
3 - Newgate Lane South		3.6	7.01	0.79	A		1.2	3.19	0.54	A
4 - Newgate Lane West (Connection)		0.1	8.43	0.11	A		0.1	4.18	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

## 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	5.06	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	5.00	195.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	428.00	8.00	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	5.00	247.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	380.00	8.00	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	5.00	258.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	428.00	8.00	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	5.00	179.00	5.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	385.00	8.00	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	0.50	3.31	1.0	A
2 - Site Access East	0.27	5.47	0.4	A
3 - Newgate Lane South	0.75	5.93	2.9	A
4 - Newgate Lane West (Connection)	0.09	7.32	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	206.00	13.90	541.81	0.380	205.39	0.6	2.671	A
2 - Site Access East	61.00	206.36	268.71	0.227	60.71	0.3	4.320	A
3 - Newgate Lane South	440.00	30.86	591.06	0.744	437.16	2.8	5.747	A
4 - Newgate Lane West (Connection)	11.00	458.07	135.76	0.081	10.91	0.1	7.204	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	258.00	14.02	541.51	0.476	257.71	0.9	3.168	A
2 - Site Access East	61.00	258.72	233.72	0.261	60.94	0.4	5.208	A
3 - Newgate Lane South	393.00	30.97	590.95	0.665	393.83	2.0	4.586	A
4 - Newgate Lane West (Connection)	11.00	413.80	164.82	0.067	11.02	0.1	5.853	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	269.00	14.97	540.78	0.497	268.92	1.0	3.310	A
2 - Site Access East	61.00	270.90	225.61	0.270	60.98	0.4	5.466	A
3 - Newgate Lane South	441.00	30.99	590.92	0.746	440.14	2.9	5.934	A
4 - Newgate Lane West (Connection)	12.00	460.14	134.93	0.089	11.98	0.1	7.317	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	189.00	14.03	541.75	0.349	189.44	0.5	2.559	A
2 - Site Access East	61.00	190.46	279.32	0.218	61.09	0.3	4.125	A
3 - Newgate Lane South	397.00	30.04	591.74	0.671	397.80	2.1	4.661	A
4 - Newgate Lane West (Connection)	10.00	418.83	162.45	0.062	10.03	0.1	5.905	A





# 2020 with CD + Development , PM

## 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	4.55	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

	To				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	24.00	330.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	230.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	24.00	347.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	279.00	35.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	24.00	357.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	250.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	24.00	325.00	5.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	225.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.71	5.63	2.4	A
2 - Site Access East	0.15	6.21	0.2	A
3 - Newgate Lane South	0.52	3.04	1.1	A
4 - Newgate Lane West (Connection)	0.05	3.99	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	360.00	41.87	546.67	0.659	358.10	1.9	4.726	A
2 - Site Access East	26.00	341.20	189.14	0.137	25.84	0.2	5.507	A
3 - Newgate Lane South	269.00	16.90	614.66	0.438	268.23	0.8	2.593	A
4 - Newgate Lane West (Connection)	13.00	275.17	271.96	0.048	12.95	0.1	3.474	A

### 16:15 - 16:30

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	377.00	41.98	546.57	0.690	376.71	2.2	5.288	A
2 - Site Access East	26.00	359.72	177.34	0.147	25.99	0.2	5.946	A
3 - Newgate Lane South	319.00	16.99	614.47	0.519	318.70	1.1	3.040	A
4 - Newgate Lane West (Connection)	13.00	324.70	238.48	0.055	12.99	0.1	3.991	A

### 16:30 - 16:45

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	387.00	42.01	546.53	0.708	386.80	2.4	5.625	A
2 - Site Access East	26.00	369.81	170.92	0.152	25.99	0.2	6.209	A
3 - Newgate Lane South	289.00	16.99	614.52	0.470	289.18	0.9	2.769	A
4 - Newgate Lane West (Connection)	13.00	296.17	257.76	0.050	13.00	0.1	3.676	A

### 16:45 - 17:00

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	354.00	42.01	546.55	0.648	354.52	1.9	4.699	A
2 - Site Access East	26.00	337.50	191.49	0.136	26.02	0.2	5.441	A
3 - Newgate Lane South	264.00	16.02	615.37	0.429	264.14	0.8	2.562	A
4 - Newgate Lane West (Connection)	12.00	271.15	274.68	0.044	12.01	0.0	3.428	A

# 2036 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	5.79	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	5.00	204.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	452.00	8.00	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	5.00	259.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	401.00	8.00	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	5.00	271.00	6.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	452.00	8.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	5.00	188.00	5.00
	2 - Site Access East	25.00	0.00	36.00	0.00
	3 - Newgate Lane South	406.00	8.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	6	5
	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	0.52	3.49	1.1	A
2 - Site Access East	0.28	5.79	0.4	A
3 - Newgate Lane South	0.79	7.01	3.6	A
4 - Newgate Lane West (Connection)	0.11	8.43	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	215.00	13.88	541.63	0.397	214.34	0.7	2.744	A
2 - Site Access East	61.00	215.31	262.69	0.232	60.70	0.3	4.449	A
3 - Newgate Lane South	464.00	30.86	591.01	0.785	460.47	3.5	6.725	A
4 - Newgate Lane West (Connection)	11.00	481.38	120.46	0.091	10.90	0.1	8.207	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	270.00	14.03	541.35	0.499	269.67	1.0	3.308	A
2 - Site Access East	61.00	270.68	225.69	0.270	60.93	0.4	5.460	A
3 - Newgate Lane South	414.00	30.97	590.90	0.701	415.15	2.4	5.153	A
4 - Newgate Lane West (Connection)	11.00	435.11	150.83	0.073	11.02	0.1	6.439	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	282.00	15.95	539.93	0.522	281.90	1.1	3.485	A
2 - Site Access East	61.00	284.87	216.28	0.282	60.98	0.4	5.795	A
3 - Newgate Lane South	465.00	30.99	590.87	0.787	463.81	3.6	7.015	A
4 - Newgate Lane West (Connection)	13.00	483.81	119.73	0.109	12.96	0.1	8.429	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	198.00	14.05	541.56	0.366	198.51	0.6	2.628	A
2 - Site Access East	61.00	199.53	273.23	0.223	61.10	0.3	4.246	A
3 - Newgate Lane South	418.00	30.05	591.69	0.706	419.12	2.5	5.248	A
4 - Newgate Lane West (Connection)	10.00	440.14	148.38	0.067	10.05	0.1	6.510	A

# 2036 with CD + Development , PM

## 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	5.03	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	24.00	347.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	241.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	24.00	364.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	293.00	35.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	24.00	375.00	6.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	262.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	24.00	342.00	5.00
	2 - Site Access East	11.00	0.00	15.00	0.00
	3 - Newgate Lane South	236.00	35.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.74	6.37	2.8	A
2 - Site Access East	0.16	6.77	0.2	A
3 - Newgate Lane South	0.54	3.19	1.2	A
4 - Newgate Lane West (Connection)	0.06	4.18	0.1	A



## Main Results for each time segment

### 16:00 - 16:15

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	377.00	42.86	545.89	0.691	374.81	2.2	5.197	A
2 - Site Access East	26.00	358.92	177.86	0.146	25.83	0.2	5.914	A
3 - Newgate Lane South	280.00	16.89	614.63	0.456	279.17	0.8	2.676	A
4 - Newgate Lane West (Connection)	14.00	286.11	264.56	0.053	13.94	0.1	3.591	A

### 16:15 - 16:30

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	394.00	42.98	545.79	0.722	393.65	2.5	5.900	A
2 - Site Access East	26.00	377.66	165.93	0.157	25.99	0.2	6.431	A
3 - Newgate Lane South	333.00	16.99	614.44	0.542	332.66	1.2	3.189	A
4 - Newgate Lane West (Connection)	14.00	338.66	229.04	0.061	13.99	0.1	4.184	A

### 16:30 - 16:45

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	405.00	43.01	545.75	0.742	404.73	2.8	6.366	A
2 - Site Access East	26.00	388.74	158.87	0.164	25.99	0.2	6.772	A
3 - Newgate Lane South	301.00	16.99	614.49	0.490	301.21	1.0	2.874	A
4 - Newgate Lane West (Connection)	14.00	308.20	249.63	0.056	14.01	0.1	3.818	A

### 16:45 - 17:00

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	371.00	43.01	545.77	0.680	371.65	2.2	5.188	A
2 - Site Access East	26.00	355.63	179.95	0.144	26.02	0.2	5.849	A
3 - Newgate Lane South	275.00	16.02	615.33	0.447	275.15	0.8	2.648	A
4 - Newgate Lane West (Connection)	13.00	282.16	267.23	0.049	13.01	0.1	3.542	A

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 - Sensitivity Test S4 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\525 Dwellings

**Report generation date:** 07/08/2020 09:58:14

- »2020 with CD + Development , AM
- »2020 with CD + Development , PM
- »2036 with CD + Development , AM
- »2036 with CD + Development , 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	3.32	0.50	A	D2	2.6	5.79	0.72	A
2 - Site Access East		0.4	5.47	0.27	A		0.2	6.17	0.15	A
3 - Newgate Lane South		3.1	6.41	0.76	A		1.0	2.91	0.49	A
4 - Newgate Lane West (Connection)		0.1	7.98	0.10	A		0.1	3.85	0.05	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.50	0.53	A	D4	3.0	6.57	0.76	A
2 - Site Access East		0.4	5.79	0.28	A		0.2	6.72	0.16	A
3 - Newgate Lane South		3.9	7.68	0.80	A		1.1	3.05	0.51	A
4 - Newgate Lane West (Connection)		0.1	9.31	0.12	A		0.1	4.03	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

## 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	5.33	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	10.00	195.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	428.00	3.00	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	10.00	247.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	380.00	3.00	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	10.00	258.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	428.00	3.00	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	10.00	179.00	5.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	385.00	3.00	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	0.50	3.32	1.0	A
2 - Site Access East	0.27	5.47	0.4	A
3 - Newgate Lane South	0.76	6.41	3.1	A
4 - Newgate Lane West (Connection)	0.10	7.98	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	211.00	8.93	546.13	0.386	210.37	0.6	2.676	A
2 - Site Access East	61.00	206.35	268.71	0.227	60.71	0.3	4.320	A
3 - Newgate Lane South	435.00	51.76	574.74	0.757	431.97	3.0	6.180	A
4 - Newgate Lane West (Connection)	11.00	473.78	125.75	0.087	10.91	0.1	7.830	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	263.00	9.01	545.72	0.482	262.70	0.9	3.177	A
2 - Site Access East	61.00	258.72	233.72	0.261	60.94	0.4	5.208	A
3 - Newgate Lane South	388.00	51.95	574.55	0.675	388.91	2.1	4.873	A
4 - Newgate Lane West (Connection)	11.00	429.87	154.58	0.071	11.02	0.1	6.271	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	274.00	9.98	544.97	0.503	273.92	1.0	3.320	A
2 - Site Access East	61.00	270.90	225.62	0.270	60.98	0.4	5.466	A
3 - Newgate Lane South	436.00	51.99	574.53	0.759	435.05	3.1	6.407	A
4 - Newgate Lane West (Connection)	12.00	476.05	124.76	0.096	11.97	0.1	7.978	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	194.00	9.02	546.16	0.355	194.45	0.6	2.561	A
2 - Site Access East	61.00	190.46	279.32	0.218	61.09	0.3	4.126	A
3 - Newgate Lane South	392.00	51.07	575.29	0.681	392.89	2.2	4.957	A
4 - Newgate Lane West (Connection)	10.00	434.94	152.12	0.066	10.03	0.1	6.335	A



# 2020 with CD + Development , PM

## 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	4.66	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	44.00	330.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	230.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00



### Demand (Veh/TS)

16:15 -  
16:30

	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	44.00	347.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	279.00	15.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	44.00	357.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	250.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	7.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	44.00	325.00	5.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	225.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	7.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.72	5.79	2.6	A
2 - Site Access East	0.15	6.17	0.2	A
3 - Newgate Lane South	0.49	2.91	1.0	A
4 - Newgate Lane West (Connection)	0.05	3.85	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	380.00	21.93	562.15	0.676	377.95	2.1	4.834	A
2 - Site Access East	25.00	341.16	189.16	0.132	24.85	0.2	5.473	A
3 - Newgate Lane South	249.00	24.85	607.98	0.410	248.31	0.7	2.498	A
4 - Newgate Lane West (Connection)	13.00	263.21	279.96	0.046	12.95	0.0	3.370	A

### 16:15 - 16:30

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	397.00	21.99	562.07	0.706	396.69	2.4	5.430	A
2 - Site Access East	25.00	359.71	177.35	0.141	24.99	0.2	5.906	A
3 - Newgate Lane South	299.00	24.99	607.82	0.492	298.73	1.0	2.909	A
4 - Newgate Lane West (Connection)	13.00	312.73	246.49	0.053	12.99	0.1	3.854	A

### 16:30 - 16:45

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	407.00	22.01	562.04	0.724	406.79	2.6	5.786	A
2 - Site Access East	25.00	369.80	170.92	0.146	24.99	0.2	6.166	A
3 - Newgate Lane South	269.00	24.99	607.84	0.443	269.17	0.8	2.660	A
4 - Newgate Lane West (Connection)	13.00	284.16	265.80	0.049	13.00	0.1	3.562	A

### 16:45 - 17:00

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	374.00	22.01	562.09	0.665	374.56	2.0	4.813	A
2 - Site Access East	25.00	337.52	191.47	0.131	25.02	0.2	5.406	A
3 - Newgate Lane South	244.00	24.03	608.64	0.401	244.13	0.7	2.469	A
4 - Newgate Lane West (Connection)	12.00	259.14	282.71	0.042	12.01	0.0	3.326	A

# 2036 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	6.16	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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				
From		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
	1 - Newgate Lane North	0.00	10.00	204.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	452.00	3.00	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	10.00	259.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	401.00	3.00	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	10.00	271.00	6.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	452.00	3.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	10.00	188.00	5.00
	2 - Site Access East	46.00	0.00	15.00	0.00
	3 - Newgate Lane South	406.00	3.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	6	5
	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	0.53	3.50	1.1	A
2 - Site Access East	0.28	5.79	0.4	A
3 - Newgate Lane South	0.80	7.68	3.9	A
4 - Newgate Lane West (Connection)	0.12	9.31	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	220.00	8.92	545.93	0.403	219.33	0.7	2.749	A
2 - Site Access East	61.00	215.30	262.69	0.232	60.70	0.3	4.449	A
3 - Newgate Lane South	459.00	51.76	574.70	0.799	455.19	3.8	7.315	A
4 - Newgate Lane West (Connection)	11.00	497.00	110.51	0.100	10.89	0.1	9.024	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	275.00	9.02	545.54	0.504	274.66	1.0	3.318	A
2 - Site Access East	61.00	270.68	225.69	0.270	60.93	0.4	5.460	A
3 - Newgate Lane South	409.00	51.95	574.51	0.712	410.29	2.5	5.525	A
4 - Newgate Lane West (Connection)	11.00	451.23	140.55	0.078	11.02	0.1	6.948	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	287.00	10.96	544.08	0.527	286.90	1.1	3.497	A
2 - Site Access East	61.00	284.87	216.28	0.282	60.98	0.4	5.795	A
3 - Newgate Lane South	460.00	51.98	574.49	0.801	458.66	3.9	7.676	A
4 - Newgate Lane West (Connection)	13.00	499.65	109.57	0.119	12.95	0.1	9.310	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	203.00	9.04	545.94	0.372	203.51	0.6	2.633	A
2 - Site Access East	61.00	199.54	273.22	0.223	61.10	0.3	4.244	A
3 - Newgate Lane South	413.00	51.08	575.25	0.718	414.26	2.6	5.633	A
4 - Newgate Lane West (Connection)	10.00	456.32	138.01	0.072	10.05	0.1	7.038	A

# 2036 with CD + Development , PM

## 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	5.18	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	44.00	347.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	241.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	44.00	364.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	293.00	15.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	44.00	375.00	6.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	262.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	44.00	342.00	5.00
	2 - Site Access East	19.00	0.00	6.00	0.00
	3 - Newgate Lane South	236.00	15.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.76	6.57	3.0	A
2 - Site Access East	0.16	6.72	0.2	A
3 - Newgate Lane South	0.51	3.05	1.1	A
4 - Newgate Lane West (Connection)	0.06	4.03	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	397.00	22.93	561.36	0.707	394.63	2.4	5.325	A
2 - Site Access East	25.00	358.87	177.89	0.141	24.84	0.2	5.874	A
3 - Newgate Lane South	260.00	24.84	607.97	0.428	259.26	0.7	2.575	A
4 - Newgate Lane West (Connection)	14.00	274.14	272.57	0.051	13.95	0.1	3.479	A

### 16:15 - 16:30

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	414.00	22.99	561.28	0.738	413.62	2.7	6.076	A
2 - Site Access East	25.00	377.64	165.94	0.151	24.99	0.2	6.385	A
3 - Newgate Lane South	313.00	24.99	607.80	0.515	312.69	1.1	3.047	A
4 - Newgate Lane West (Connection)	14.00	326.68	237.06	0.059	13.99	0.1	4.034	A

### 16:30 - 16:45

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	425.00	23.01	561.25	0.757	424.71	3.0	6.571	A
2 - Site Access East	25.00	388.73	158.88	0.157	24.99	0.2	6.721	A
3 - Newgate Lane South	281.00	24.99	607.82	0.462	281.19	0.9	2.756	A
4 - Newgate Lane West (Connection)	14.00	296.18	257.68	0.054	14.00	0.1	3.692	A

### 16:45 - 17:00

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	391.00	23.01	561.29	0.697	391.71	2.3	5.331	A
2 - Site Access East	25.00	355.66	179.93	0.139	25.02	0.2	5.812	A
3 - Newgate Lane South	255.00	24.03	608.61	0.419	255.14	0.7	2.546	A
4 - Newgate Lane West (Connection)	13.00	270.16	275.27	0.047	13.01	0.0	3.433	A



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 - Sensitivity Test S5 525 Aug 2020.j9

**Path:** T:\Projects\10000 Series Project Numbers\10353ITB Newgate Lane, Fareham\Tech\Assessments\Arcady\2020\Updated Modelling\525 Dwellings

**Report generation date:** 07/08/2020 10:00:03

- »2020 with CD + Development , AM
- »2020 with CD + Development , PM
- »2036 with CD + Development , AM
- »2036 with CD + Development , 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	0.9	3.06	0.48	A	D2	2.7	6.03	0.74	A
2 - Site Access East		0.4	5.21	0.26	A		0.2	6.30	0.15	A
3 - Newgate Lane South		1.8	4.42	0.65	A		1.2	3.26	0.54	A
4 - Newgate Lane West (Connection)		0.1	5.69	0.09	A		0.1	4.21	0.06	A
	2036 with CD + Development									
1 - Newgate Lane North	D3	1.1	3.50	0.53	A	D4	3.2	6.67	0.76	A
2 - Site Access East		0.4	5.79	0.28	A		0.2	6.77	0.16	A
3 - Newgate Lane South		4.0	8.01	0.81	A		1.0	2.99	0.50	A
4 - Newgate Lane West (Connection)		0.1	9.77	0.12	A		0.1	3.98	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

## 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	4.04	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	457.474

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	12.00	190.00	10.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	358.00	1.00	0.00	6.00
	4 - Newgate Lane West (Connection)	7.00	0.00	8.00	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	12.00	244.00	8.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	317.00	1.00	0.00	6.00
	4 - Newgate Lane West (Connection)	7.00	0.00	8.00	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	12.00	253.00	7.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	357.00	1.00	0.00	6.00
	4 - Newgate Lane West (Connection)	7.00	0.00	9.00	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	12.00	173.00	4.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	320.00	1.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	10.00	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	2	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	3	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.48	3.06	0.9	A
2 - Site Access East	0.26	5.21	0.4	A
3 - Newgate Lane South	0.65	4.42	1.8	A
4 - Newgate Lane West (Connection)	0.09	5.69	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	212.00	8.95	566.87	0.374	211.41	0.6	2.527	A
2 - Site Access East	61.00	207.39	273.17	0.223	60.71	0.3	4.231	A
3 - Newgate Lane South	365.00	64.71	565.29	0.646	363.20	1.8	4.415	A
4 - Newgate Lane West (Connection)	15.00	411.98	174.67	0.086	14.91	0.1	5.631	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	264.00	9.01	566.51	0.466	263.73	0.9	2.969	A
2 - Site Access East	61.00	259.74	239.49	0.255	60.95	0.3	5.039	A
3 - Newgate Lane South	324.00	62.95	566.69	0.572	324.45	1.3	3.721	A
4 - Newgate Lane West (Connection)	15.00	373.40	201.26	0.075	15.01	0.1	4.834	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	272.00	9.99	565.70	0.481	271.95	0.9	3.063	A
2 - Site Access East	61.00	268.93	233.57	0.261	60.99	0.4	5.214	A
3 - Newgate Lane South	364.00	61.99	567.39	0.642	363.58	1.8	4.407	A
4 - Newgate Lane West (Connection)	16.00	412.57	174.26	0.092	15.98	0.1	5.686	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	189.00	11.00	565.09	0.334	189.42	0.5	2.397	A
2 - Site Access East	61.00	187.41	285.97	0.213	61.08	0.3	4.004	A
3 - Newgate Lane South	326.00	59.08	569.62	0.572	326.42	1.4	3.709	A
4 - Newgate Lane West (Connection)	16.00	376.48	199.14	0.080	16.01	0.1	4.914	A



# 2020 with CD + Development , PM

## 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	4.91	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D2	2020 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	53.00	326.00	10.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	255.00	6.00	0.00	5.00
	4 - Newgate Lane West (Connection)	4.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	53.00	343.00	9.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	310.00	6.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	53.00	352.00	9.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	275.00	6.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	9.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	53.00	320.00	9.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	252.00	6.00	0.00	4.00
	4 - Newgate Lane West (Connection)	2.00	0.00	10.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	2	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	2	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.74	6.03	2.7	A
2 - Site Access East	0.15	6.30	0.2	A
3 - Newgate Lane South	0.54	3.26	1.2	A
4 - Newgate Lane West (Connection)	0.06	4.21	0.1	A



## Main Results for each time segment

### 16:00 - 16:15

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	389.00	13.95	563.72	0.690	386.81	2.2	5.027	A
2 - Site Access East	26.00	342.08	186.56	0.139	25.84	0.2	5.593	A
3 - Newgate Lane South	266.00	32.80	595.86	0.446	265.20	0.8	2.715	A
4 - Newgate Lane West (Connection)	12.00	283.07	264.67	0.045	11.95	0.0	3.561	A

### 16:15 - 16:30

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	405.00	13.99	563.59	0.719	404.68	2.5	5.649	A
2 - Site Access East	26.00	359.70	175.22	0.148	25.99	0.2	6.030	A
3 - Newgate Lane South	321.00	31.99	596.41	0.538	320.65	1.2	3.259	A
4 - Newgate Lane West (Connection)	13.00	338.64	226.74	0.057	12.99	0.1	4.210	A

### 16:30 - 16:45

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	414.00	15.00	562.80	0.736	413.78	2.7	6.026	A
2 - Site Access East	26.00	369.80	168.74	0.154	25.99	0.2	6.304	A
3 - Newgate Lane South	285.00	31.99	596.41	0.478	285.24	0.9	2.896	A
4 - Newgate Lane West (Connection)	15.00	304.23	250.23	0.060	15.00	0.1	3.825	A

### 16:45 - 17:00

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	382.00	16.00	562.17	0.680	382.57	2.2	5.029	A
2 - Site Access East	26.00	339.52	188.22	0.138	26.02	0.2	5.550	A
3 - Newgate Lane South	262.00	32.03	596.42	0.439	262.13	0.8	2.692	A
4 - Newgate Lane West (Connection)	12.00	281.15	265.98	0.045	12.02	0.0	3.545	A

# 2036 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	6.35	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D3	2036 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	12.00	204.00	6.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	452.00	1.00	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	12.00	259.00	6.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	401.00	1.00	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	12.00	271.00	6.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	452.00	1.00	0.00	5.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	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	12.00	188.00	5.00
	2 - Site Access East	55.00	0.00	6.00	0.00
	3 - Newgate Lane South	406.00	1.00	0.00	4.00
	4 - Newgate Lane West (Connection)	4.00	0.00	6.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	6	5
	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	0.53	3.50	1.1	A
2 - Site Access East	0.28	5.79	0.4	A
3 - Newgate Lane South	0.81	8.01	4.0	A
4 - Newgate Lane West (Connection)	0.12	9.77	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	222.00	6.93	547.64	0.405	221.32	0.7	2.752	A
2 - Site Access East	61.00	215.30	262.70	0.232	60.70	0.3	4.449	A
3 - Newgate Lane South	457.00	60.71	567.72	0.805	453.05	4.0	7.607	A
4 - Newgate Lane West (Connection)	11.00	503.81	106.07	0.104	10.89	0.1	9.444	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	277.00	7.02	547.22	0.506	276.66	1.0	3.322	A
2 - Site Access East	61.00	270.68	225.69	0.270	60.93	0.4	5.460	A
3 - Newgate Lane South	407.00	60.94	567.49	0.717	408.36	2.6	5.703	A
4 - Newgate Lane West (Connection)	11.00	458.30	135.95	0.081	11.03	0.1	7.207	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	289.00	8.96	545.74	0.530	288.90	1.1	3.501	A
2 - Site Access East	61.00	284.87	216.28	0.282	60.98	0.4	5.795	A
3 - Newgate Lane South	458.00	60.98	567.48	0.807	456.58	4.0	8.008	A
4 - Newgate Lane West (Connection)	13.00	506.57	105.03	0.124	12.95	0.1	9.769	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	205.00	7.04	547.69	0.374	205.52	0.6	2.635	A
2 - Site Access East	61.00	199.54	273.22	0.223	61.10	0.3	4.244	A
3 - Newgate Lane South	411.00	60.10	568.22	0.723	412.34	2.7	5.822	A
4 - Newgate Lane West (Connection)	10.00	463.41	133.36	0.075	10.06	0.1	7.304	A

# 2036 with CD + Development , PM

## 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	5.26	A

### Junction Network Options

Driving side	Lighting
Left	Normal/unknown

## 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)
D4	2036 with CD + Development	PM	DIRECT	16:00	17:00	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)

16:00 -  
16:15

		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	53.00	347.00	6.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	241.00	6.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:15 -  
16:30

	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	53.00	364.00	6.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	293.00	6.00	0.00	5.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:30 -  
16:45

	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	53.00	375.00	6.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	262.00	6.00	0.00	4.00
	4 - Newgate Lane West (Connection)	6.00	0.00	8.00	0.00

### Demand (Veh/TS)

16:45 -  
17:00

	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	53.00	342.00	5.00
	2 - Site Access East	23.00	0.00	3.00	0.00
	3 - Newgate Lane South	236.00	6.00	0.00	4.00
	4 - Newgate Lane West (Connection)	5.00	0.00	8.00	0.00

## Vehicle Mix

### Heavy Vehicle Percentages

	To				
		1 - Newgate Lane North	2 - Site Access East	3 - Newgate Lane South	4 - Newgate Lane West (Connection)
From	1 - Newgate Lane North	0	0	1	0
	2 - Site Access East	0	0	0	0
	3 - Newgate Lane South	1	0	0	0
	4 - Newgate Lane West (Connection)	0	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	0.76	6.67	3.2	A
2 - Site Access East	0.16	6.77	0.2	A
3 - Newgate Lane South	0.50	2.99	1.0	A
4 - Newgate Lane West (Connection)	0.06	3.98	0.1	A

## Main Results for each time segment

### 16:00 - 16:15

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	406.00	13.95	568.31	0.714	403.55	2.4	5.386	A
2 - Site Access East	26.00	358.84	177.91	0.146	25.83	0.2	5.912	A
3 - Newgate Lane South	251.00	28.81	604.64	0.415	250.29	0.7	2.534	A
4 - Newgate Lane West (Connection)	14.00	269.15	275.77	0.051	13.95	0.1	3.437	A

### 16:15 - 16:30

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	423.00	13.99	568.25	0.744	422.61	2.8	6.159	A
2 - Site Access East	26.00	377.64	165.94	0.157	25.99	0.2	6.430	A
3 - Newgate Lane South	304.00	28.98	604.49	0.503	303.70	1.0	2.989	A
4 - Newgate Lane West (Connection)	14.00	321.69	240.27	0.058	13.99	0.1	3.977	A

### 16:30 - 16:45

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	434.00	14.00	568.22	0.764	433.69	3.2	6.670	A
2 - Site Access East	26.00	388.72	158.88	0.164	25.99	0.2	6.772	A
3 - Newgate Lane South	272.00	28.99	604.49	0.450	272.18	0.8	2.709	A
4 - Newgate Lane West (Connection)	14.00	291.17	260.90	0.054	14.00	0.1	3.644	A

### 16:45 - 17:00

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	400.00	14.00	568.27	0.704	400.73	2.4	5.395	A
2 - Site Access East	26.00	355.67	179.92	0.145	26.02	0.2	5.850	A
3 - Newgate Lane South	246.00	28.03	605.26	0.406	246.14	0.7	2.506	A
4 - Newgate Lane West (Connection)	13.00	265.15	278.48	0.047	13.01	0.0	3.392	A

## **APPENDIX D. HCC CORRESPONDENCE**



## Tim Wall

---

**From:** Morton, Stuart [REDACTED]  
**Sent:** 05 September 2018 08:23  
**To:** Steve Jenkins  
**Cc:** Tim Wall; Drury, Holly  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Steve,

Thank you for your patience on this. As I am sure you appreciate, the question whilst asked simply, is complex to answer and crosses a few teams within HCC, not just DP.

I reiterate the overarching principle of these accesses has been commented on through the Local Plan process, with the position being that they are considered directly prejudicial to the role and purpose of the Newgate Lane highway improvement scheme, recently completed with Government funding. Separate to this you have approached HCC DP to carry out a review of some technical material related to these accesses which I comment on below.

### **Newgate Lane Access**

Based on the theoretical modelling you have undertaken on the access in isolation, it is demonstrated that 10 second additional delay will be incurred at this point in the network, as a result of your proposed access junction. Whilst not prejudicing the overarching position, HCC is mindful that this delay could be reduced/controlled further should the junction take the alternative form. You have previously outlined sufficient land to secure a junction in any form.

Also as previously mentioned your technical analysis is on the access junction in isolation and the development impact on the wider network is not demonstrated. We however expect this to be evidenced (or otherwise) within the forthcoming evidence base for the emerging local plan.

### **Brookers Lane**

A pre-application design check has been submitted for this scheme, which, to be clear, reviews the technical ability to construct an access only and does not agree the principle or acceptance in planning terms of a new vehicular access onto Brookers Lane. Technically we can confirm that a suitable access could be constructed. We are unable to assess whether it is acceptable in principle until more details are confirmed on the extent of development it would access through the making of a planning application, or through further assessment and outcomes being available from the wider emerging local plan assessment.

There are a couple of matters which should be noted regarding the current proposed design.

1. The tracking drawing provided shows the vehicle running along the kerb edge and centre line. This is obviously not acceptable. We believe a suitable design can be achieved by widening the access road to accommodate the vehicle (to 6m).
2. The alignment and connection of the shared use path facility onto Brook Lane is inadequate. The shared use path would need to be extended within the site road to allow cyclists to join the cycle route and re-join the carriageway past the new aligned access road.

I hope the above is helpful at this stage.

Regards

**Stuart Morton**  
Transport Team Leader

Strategic Transport  
Economy, Transport & Environment  
Hampshire County Council, The Castle, Winchester



**Hampshire County Council operates a pre-application highway advice service for developers.**

Hampshire County Council welcomes and encourages discussions before a developer submits a planning application. Please follow this link for further information

[Pre-Application guidance for developers](#)

---

**From:** Steve Jenkins [REDACTED]  
**Sent:** 09 August 2018 17:46  
**To:** Morton, Stuart; Drury, Holly  
**Cc:** Tim Wall  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Thanks Stu, that's helpful.

Regards Steve

**Steve Jenkins BSc MSc MCIHT MRTPI**  
**Associate Partner**  
for i-Transport LLP

**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG

---

**From:** Morton, Stuart [REDACTED]  
**Sent:** 09 August 2018 16:31

[REDACTED] >  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Steve,

The principle of these accesses has been commented on through the Local Plan process. Our review of the technical material related to these access is on-going but of course inter-related. A meeting is arranged with the Director here next Wednesday to discuss after which we can comment further.

Hope that helps.

Thanks

Regards

**Stuart Morton**  
Transport Team Leader

Strategic Transport  
Economy, Transport & Environment  
Hampshire County Council, The Castle, Winchester  
Tel: (01962) 846826  
[REDACTED]



**Hampshire County Council operates a pre-application highway advice service for developers.**

Hampshire County Council welcomes and encourages discussions before a developer submits a planning application. Please follow this link for further information

[Pre-Application guidance for developers](#)

---

**From:** Steve Jenkins [REDACTED]  
**Sent:** 08 August 2018 17:48  
**To:** Drury, Holly  
**Cc:** Morton, Stuart; Tim Wall  
**Subject:** FW: Newgate Lane, Meeting with HCC - minutes of meeting

Hi Holly and Stu,

I'll keep this brief. I am chasing you on two counts on this site I'm afraid.

Our clients (Miller and Bargate) are chasing us and FBC are chasing them. Both are asking us for updates on the position with regard to the matter of site access at this draft allocation.

Firstly, is the principle of the roundabout access onto Newgate Lane (drawing ITB10353-GA-003 Rev B) now agreed? If not, please confirm what additional assessment work is required to demonstrate the suitability of the proposed junction on Newgate Lane South. Our position is set out below.

Also, is the principle of the secondary access to the site from Brookers Lane (to serve a limited part of the proposed allocation site i.e. up to 100 dwellings), as covered in the attached email (drawing ITB13747-001B) now agreed, subject to the normal assessments that would be required at both the planning and Section 278 stages.

If you cannot answer these now, please can you let us know when we will receive HCC's response. We have paid for pre-app services on these matters.

Regards Steve

**Steve Jenkins BSc MSc MCIHT MRTPI**  
**Associate Partner**  
for i-Transport LLP

**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG  
[REDACTED]

---

**From:** Tim Wall  
**Sent:** 18 July 2018 09:24  
**To:** Drury, Holly <[REDACTED]>, Stuart <[REDACTED]>  
**Cc:** Steve Jenkins <[REDACTED]>, Paul Thorpe <[REDACTED]>

'steve@bargatehomes.co.uk' [REDACTED]; Andy Evans [REDACTED] PAUL  
 NEWMAN <[REDACTED]>; Seebohm, Oli <[OSeebohm@Fareham.Gov.UK](mailto:OSeebohm@Fareham.Gov.UK)>; Lyons, Robyn  
 <[RLyons@Fareham.Gov.UK](mailto:RLyons@Fareham.Gov.UK)>; Mark Jackson <[REDACTED]>  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Holly,

Thank you for your e-mail. This does however provide perhaps less clarity than we had before.

As we understand HCC's position:

- HCC objects to the draft Allocation, on the basis that a new access may reduce the benefits of the recently constructed Newgate Lane South scheme by introducing additional delay
- Any new junction to Newgate Lane South would introduce some element of delay at the new junction
- HCC accepts that the land holding described provides the potential to deliver a satisfactory junction in design terms, and to further reduce any delay resulting from the junction beyond that already considered and presented
- The impact of the delay arising from the junction has not been considered in the context of the wider corridor, and in HCC's view may result in a 'Severe' impact.

Whilst we can understand the need for HCC to consider carefully the provision of new junctions in the area, and is correct to have in mind the impact of introducing new junctions on the network in terms of the wider demands, we need to put into context the proposed impact of the development, namely that:

- Providing a new roundabout junction on Newgate Lane South will inevitably result in some delay at the junction. However, in this case the average delay on the worst performing arm of the junction is 10 seconds. This is plainly a vanishingly small increase in delay, and will be imperceptible to the travelling public. The remainder of the approaches generate less delay of between 4-9 seconds. This cannot be considered to be a severe impact;
- The proposed junction is located between two traffic signal controlled junctions, one at Peel Common and one at Royal Sovereign Avenue. By their very nature, traffic signal junctions introduce periods of delay, where the junction cycles to provide priority to alternative arms. Any downstream delay incurred as a result of the proposed roundabout to Newgate Lane will in all likelihood be absorbed by the existing delay and operation at both Peel Common and Royal Sovereign Avenue, and will in all reality have no material impact on journey times on the wider corridor. In simple terms, cars will catch up any lost time at the next junction; and
- Notwithstanding this, to put the isolated delay arising from the proposed Newgate Lane South roundabout into context, as you have requested, the table below provides an appraisal of the junction delay considered against journey times between Cherque Way (south of Peel Common) to M27 Junction 11, in both peak periods:

Route	Existing Journey Time (Google Maps)		Junction Delay at NLS (2036)		Corridor Impact	
	Morning Peak (at 07:45)	Evening Peak (at 17:00)	Morning Peak (at 07:45)	Evening Peak (at 17:00)	Morning Peak (at 07:45)	Evening Peak (at 17:00)
Newgate Lane northbound	14-30 Mins = 22 Mins (1,320 Secs)	9-16 Mins = 12.5 Mins (750 Secs)	10.51 Secs	6.99 Secs	0.80%	0.93%
Cherque Way - Peel Common – M27 Junction 11						
Newgate Lane southbound	9-16 Mins = 12.5 Mins (750 Secs)	12-26 Mins = 19 Mins (1140 Secs)	3.89 Secs	9.30 Secs	0.52%	0.82%

M27 Junction 11 – Peel Common – Cherque Way						
---	--	--	--	--	--	--

As is plain, the impact of the introduction of the proposed junction is immaterial, increasing delay by less than 1 percent. Surely we are not at a point on the corridor when **any** new delay arising from delivering a site access to an otherwise suitable and sustainable site for development, however small or inconsequential as is demonstrated here, should prevent access being agreed in principle? We accept any access would be subject to the normal and further assessments at both the planning and S278 stages.

We would ask that you consider the contents of this e-mail, and seek to provide some further clarity on your position. Particularly, if you feel additional assessment work is required to demonstrate the suitability of a new access junction on Newgate Lane South, please can you advise what this would comprise so that we can prepare this for you.

Kind regards

Tim

**Tim Wall BA (Hons) MSc MCIHT CMILT**  
Associate Partner  
for i-Transport LLP



**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG

We use the word "partner" to refer to a member of i-Transport LLP or an employee or consultant with equivalent standing and qualifications.

Please note that **the information in this e-mail is confidential** and unless you are (or authorised to receive it for) the intended recipient, you must not disclose, copy, circulate or in any way use the information it contains. **If you have received this e-mail in error** please inform us and immediately delete all copies from your system. Whilst it is believed that this e-mail and any attachments are free of any virus or other defect, it is your responsibility to ensure that your computer or IT system are not affected and we accept no responsibility for any loss or damage arising.

i-Transport LLP is a limited liability partnership Registered in England under number OC311185. Registered Office: 3<sup>rd</sup> Floor, One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN. A list of members is available upon request.

---

**From:** Drury, Holly <[REDACTED]>  
**Sent:** 16 July 2018 16:15  
**To:** Tim Wall <[REDACTED]>, Stuart <[REDACTED]>  
**Cc:** Steve Jenk <[REDACTED]>; Paul Thomas <[REDACTED]>;  
[REDACTED]; Andy <[REDACTED]>;  
[REDACTED] PAUL NEWMAN <[REDACTED]>; Seeborn, Oll  
<[OSeeborn@Fareham.Gov.UK](mailto:OSeeborn@Fareham.Gov.UK)>; Lyons, Robyn <[RLyons@Fareham.Gov.UK](mailto:RLyons@Fareham.Gov.UK)>  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

*Dear Tim*

*Thank you for your email and apologies for the delay.*

*As you are aware there remains an objection from HCC to this emerging allocation, principally because the recent improvements to Newgate Lane were specifically designed to improve journey times in the area. An access along it has the potential to lessen this benefit.*

*If your proposed access were to be taken in isolation, it is noted that additional delay to Newgate Lane is a consequence of your proposal. It is likely that, based on what you have advised us, the landowners have sufficient land to deliver a roundabout to any scale or form required which may reduce this delay. Furthermore there may be another junction type which could reduce delay on Newgate Lane from that which you have presented.*

*However as you note the impact of the proposed development has not been considered in the context of the wider delay along the corridors leading to and from the site. We are therefore unable to confirm without the provision of additional information if the overall impact of the site can be accommodated or mitigated without causing a significant negative impact on the Highway including to the Newgate Lane corridor and its extension to A27 via the A32.*

Kind Regards

Holly

**Holly Drury BSc (Hons) MSc MCIHT MSoRSA**  
**Senior Engineer – Highways Development Planning**  
Strategic Transport



**Hampshire County Council operates a pre-application highway advice service for developers.**

Hampshire County Council welcomes and encourages discussions before a developer submits a planning application. Please follow this link for further information

[Pre-Application guidance for developers](#)

---

**From:** Tim Wall

**Sent:** 10 July 2018 10:00

**To:** Drury, Holly; Morton, Stuart

**Cc:** Steve Jenkins; Paul Thomas; 'steve@bargatehomes.co.uk'; Andy Evans; PAUL NEWMAN; Seebohm, Oli; Lyons, Robyn

**Subject:** Newgate Lane, Meeting with HCC - minutes of meeting

**Importance:** High

Hi Holly,

It has now been nearly 2 months since my e-mail below asking for clarity on HCC's position on the proposed access to serve draft allocation HA2.

Whilst we of course understand the need for HCC to consider this matter carefully, can you please let me know when you expect HCC to be able to respond on this matter?

As outlined below, on the basis of the technical assessment work we have presented and agreed, can HCC now confirm that there are no technical objections to the delivery of a roundabout to Newgate Lane South to serve the





**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG

[Redacted]

We use the word "partner" to refer to a member of i-Transport LLP or an employee or consultant with equivalent standing and qualifications.

Please note that **the information in this e-mail is confidential** and unless you are (or authorised to receive it for) the intended recipient, you must not disclose, copy, circulate or in any way use the information it contains. **If you have received this e-mail in error** please inform us and immediately delete all copies from your system. Whilst it is believed that this e-mail and any attachments are free of any virus or other defect, it is your responsibility to ensure that your computer or IT system are not affected and we accept no responsibility for any loss or damage arising.

i-Transport LLP is a limited liability partnership Registered in England under number OC311185. Registered Office: 3<sup>rd</sup> Floor, One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN. A list of members is available upon request.

---

**From:** Tim Wall

**Sent:** 15 May 2018 15:26

**To:** Drury, Holly <[Redacted]>, Stuart <[Redacted]>

**Cc:** Steve Jenkins <[Redacted]>; Paul Thorn <[Redacted]>

[Redacted]; Seebohm, Oli

Holly,

Thank you for your e-mail and for your continued help with this matter.

Your comments about the vehicle routing are noted and we will be in contact at the appropriate time to take this forward in an agreed manner.

In the meantime, to summarise the position that I understand we have reached with specific regard to the access in the context of the draft Local Plan:

- Following the sensitivity testing (in terms of trip rates and turning movements at the roundabout) HCC is satisfied that the modelling assessment of the proposed roundabout junction is suitable to consider the acceptability of access to the draft Allocation site; and
- Whilst the design process will define the precise form of the scheme (such as the length of exit merge needed to achieve optimum lane usage), HCC is satisfied that there is sufficient scope in the land control to achieve a satisfactory junction to Newgate Lane South in both design and operational terms.

On this basis, can you confirm, subject of course to the normal assessments that would be expected at planning application and Section 278 stages, that HCC has no technical objections to a new roundabout onto Newgate Lane to serve the draft Allocation site HA2?

Kind regards

Tim



Tim Wall BA (Hons) MSc MCIHT CMILT  
Associate Partner  
for i-Transport LLP



**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG

We use the word "partner" to refer to a member of i-Transport LLP or an employee or consultant with equivalent standing and qualifications.

Please note that **the information in this e-mail is confidential** and unless you are (or authorised to receive it for) the intended recipient, you must not disclose, copy, circulate or in any way use the information it contains. **If you have received this e-mail in error** please inform us and immediately delete all copies from your system. Whilst it is believed that this e-mail and any attachments are free of any virus or other defect, it is your responsibility to ensure that your computer or IT system are not affected and we accept no responsibility for any loss or damage arising.

i-Transport LLP is a limited liability partnership Registered in England under number OC311185. Registered Office: 3<sup>rd</sup> Floor, One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN. A list of members is available upon request.

---

**From:** Drury, Holly <[REDACTED]>  
**Sent:** 10 May 2018 <[REDACTED]>  
**To:** Steve Jenkins <[REDACTED]>  
**Cc:** Morton, Stuart <[REDACTED]>  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Steve

Thanks for the minutes. These are agreed as reflective of the discussion on the day based on the information we had to date. They should be considered alongside ongoing communication regarding this matter and not in isolation.

I note the additional ward has been added with regards distribution and the models have been updated and the models are agreed however please note our comments below.

I note our action to review and respond on the route choice. This can be considered once the additional route timing evidence has been provided. I understand that this was something you were wanting to review together.

Regarding the unequal lane usage matter we note the content of your email below. We believe however that there will be an element of unequal lane usage because, despite the set up of modelling software, drivers in Britain who commonly travel through this type of arrangement with an exit merge (at a roundabout or signals or even on a dual carriageway where there is a two to one lane merge) are often reluctant to use the second offside lane, when they know they will have to merge on exit from the junction, because in Britain many people still (wrongly) see this as 'cutting-in'. Also drivers in the nearside lane are often reluctant to leave a gap and/or let people from the offside lane in. It's therefore unusual to observe the full amount of capacity predicted by a model as whilst some (perhaps more aggressive) drivers will use the offside lane, not everyone

will. We are aware that a model showing single lane usage would also not reflect the true operation of the proposed junction but in reality there would be a point in-between these two models which would be true. We therefore believe that there may be a more systematic under-use of the offside lane that Arcady takes into account as 'random' variation and therefore increases in the delay predicted.

Increasing the length of the exit merge taper would help achieve the proposed modelled results as a longer taper would increase the propensity for the offside lane to be used and therefore capacity at the roundabout would be increased. How long this should be would need to be considered along with other geometric design comments. If you wish for this to be explored further please let me know and I can request comments from our engineering team.

Kind Regards

Holly

**Holly Drury BSc (Hons) MSc MCIHT MSoRSA**  
**Senior Engineer – Highways Development Planning**  
Strategic Transport



**Hampshire County Council operates a pre-application highway advice service for developers.**

Hampshire County Council welcomes and encourages discussions before a developer submits a planning application. Please follow this link for further information

[Pre-Application guidance for developers](#)

---

**From:** Steve Jenkins [REDACTED]  
**Sent:** 23 March 2018 18:29  
**To:** Drury, Holly; Morton, Stuart  
**Cc:** Andy Evans; Paul Thomas; Seebohm, Oli; [REDACTED] PAUL NEWMAN;  
[REDACTED] Lyons, Robyn  
**Subject:** Newgate Lane, Meeting with HCC - minutes of meeting

Hi Holly and Stu,

Thank you for your comments on the minutes, all of which are accepted, albeit we are surprised at some of them - particularly the deletion of 'very onerous' in respect of the 90% test which I recall was universally accepted as just that.

Please note the following, non-contentious minor amendments:

- 2.6 – I have added the words 'by HCC';
- 4.6 – I have noted that the worksheet is attached to the minutes;
- 4.14 – I have noted that the models are attached to the minutes; and
- 4.17 – I have added that 'i-Transport' consider the uplifted trip rates of 0.569 and 0.647 to be much higher than would be expected for a strategic scale site.

Attached is a pdf of the agreed minutes.

I note your comment on 6.1 and fundamentally disagree with your observation and understanding of the ARCADY programme, this was an action to us, our response is set out below.

To re-cap, you state:

*“Whilst the Kimber model is used for the initial junction assessment within Arcady where there is a reality of unequal lane usage due to control of lane use by road markings or through a potential likelihood that lane usage could not be assumed to be openly available for all destinations then Junctions 9 has for a long time had the Lane Simulation tool. This should be utilised here to address the concern that due to the requirement to merge on exit lane usage on the roundabout approaches will not be evenly split across all available lanes.”*

Firstly, there is no ‘reality of unequal lane use’ or any ‘control of lane use by road markings’ at this location.

Secondly, the ARCADY software does not rely on lane usage being ‘evenly split across all available lanes’.

The TRL document- Roundabout Capacity: The UK Empirical Methodology, provides the definitive guidance on these matters. It directly contradicts your assertion that entry width relationships only work if all the available road space is used all the time – quite simply, it says, ‘*This is not true*’. Indeed, TRL go much further stating, ‘*If space is randomly not used from time to time, just because drivers choose not to, then this behaviour is fully reflected in the road measurements behind the empirical relationships, and therefore they take this into account when predicting the capacity of a proposed roundabout entry*’.

We do, of course accept that there are some junctions where poor design or historic remedial measures mean that all road space cannot be used. TRL describe this as a systematic failure to use all the road space for a number of reasons, such as:

- (i) Poor geometry or visibility;
- (ii) Inappropriate lane arrows / markings; and
- (iii) Exits which are only able to accept one lane of traffic.

None of these points apply to the proposed design at Newgate Lane South (NGLS) which is:

- (i) Designed to meet all DMRB standards;
- (ii) Provides full 40mph visibility;
- (iii) Provides two lane entries and two lane exits on all arms - see drawing ITB10353-GA-003.

In further consideration of the above point, it is clear from the current and forecast traffic flows that the vast majority of movements on NGLS will be north / south (and vis versa). Peak time traffic will largely be motorists using the road on a daily basis who will be fully aware that the north / south (and vis versa) movement is fully available via two lane entries and two lane exits. You will be aware that our traffic work shows that in 2036, 97% and 95% of NB and SB entry flow is straight across in the morning and 90% and 93% is straight across in the evening. It is simply not plausible that such a volume of drivers will systematically queue in the nearside lane whilst the off side lane is empty. As noted in the minutes, we control land on both approaches and we can further lengthen the extent of two lane entry and two lane exit if you feel this necessary.

Attached are the models and worksheets as per our actions – the worksheet has been updated to include the third JTW area and modelling tables updated as per the actions.

Regarding the models, we have updated the HGV percentages, this has marginally decreased the junction performance. A 2 metre extension of the length of two lane entry would bring the junction performance back to that which we presented to you at the meeting. This can clearly be achieved given our land control. Quite frankly, we are talking about a maximum 10 second delay for a short period on a corridor which is controlled by traffic signals, any such delay will, in all likelihood be lost at the next up or downstream junction and will have no material impact on journey times along the corridor.

The worksheet has been updated to include the third JTW area, this includes some areas north of the A27 which we do not consider comparable to the site, nonetheless this further area makes very little difference as you will see.

We have also checked the traffic flows used for the 'old road' connection for our assessment of both the HCC junction and the site access roundabout. The flows used are from the HCC NGLS TA.

Finally, as discussed at the meeting, we remain confident that the HCC objection to the Local Plan policy is untenable and that whilst there is work to do to support a planning application (i.e. wider traffic impact and developing a sustainable transport strategy) matters relating to site access should clearly, under any reasonable assessment be readily agreeable.

We look forward to your response on the HCC actions.

Regards Steve

**Steve Jenkins BSc MSc MCIHT MRTPI**  
**Associate Partner**  
for i-Transport LLP

---

**From:** Drury, Holly <[REDACTED]>  
**Sent:** 20 March 2018 09:51  
**To:** Steve Jenkins <[REDACTED]>; Tim Wall <[REDACTED]>; Lyons, Robyn <[REDACTED]>  
**Cc:** Andy Evans <[REDACTED]>; Paul Thomas <[REDACTED]>; Morton, Stuart <[REDACTED]>; Seebohm, Oli <[REDACTED]>; Steve Birch <[REDACTED]>; PAUL NEWMAN <[REDACTED]>  
**Subject:** RE: Newgate Lane, Meeting with HCC - minutes of meeting

Steve

We have the attached comments on the meeting minutes. At present the meeting minutes are not agreed.

Kind Regards  
Holly  
**Holly Drury BSc (Hons) MSc MCIHT MSoRSA**  
**Senior Engineer – Highways Development Planning**  
Strategic Transport  
[REDACTED]



**Hampshire County Council operates a pre-application highway advice service for developers.**

Hampshire County Council welcomes and encourages discussions before a developer submits a planning application. Please follow this link for further information

[Pre-Application guidance for developers](#)

---

**From:** Steve Jenkins <[REDACTED]>  
**Sent:** 06 March 2018 17:48  
**To:** Tim Wall; Lyons, Robyn; Drury, Holly  
**Cc:** Andy Evans; Paul Thomas; Morton, Stuart; Seebohm, Oli; Steve Birch; PAUL NEWMAN;

[REDACTED]  
**Subject:** Newgate Lane, Meeting with HCC - minutes of meeting

Hi All,

Please find attached the minutes of the meeting last week.

Do please let me know if you require any changes before we issue in PDF.

Regards Steve

**Steve Jenkins BSc MSc MCIHT MRTPI**  
**Associate Partner**  
for i-Transport LLP



**Basingstoke Office:** Grove House, Lutyens Close, Chineham Court, Basingstoke, RG24 8AG

[REDACTED]  
We use the word "partner" to refer to a member of i-Transport LLP or an employee or consultant with equivalent standing and qualifications.

Please note that **the information in this e-mail is confidential** and unless you are (or authorised to receive it for) the intended recipient, you must not disclose, copy, circulate or in any way use the information it contains. **If you have received this e-mail in error** please inform us and immediately delete all copies from your system. Whilst it is believed that this e-mail and any attachments are free of any virus or other defect, it is your responsibility to ensure that your computer or IT system are not affected and we accept no responsibility for any loss or damage arising.

i-Transport LLP is a limited liability partnership Registered in England under number OC311185. Registered Office: 3<sup>rd</sup> Floor, One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN. A list of members is available upon request.

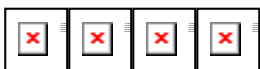
\*\*\* This email, and any attachments, is strictly confidential and may be legally privileged. It is intended only for the addressee. If you are not the intended recipient, any disclosure, copying, distribution or other use of this communication is strictly prohibited. If you have received this message in error, please contact the sender. Any request for disclosure of this document under the Data Protection Act 1998 or Freedom of Information Act 2000 should be referred to the sender. [disclaimer id: HCCStdDisclaimerExt] \*\*\*

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 21 December 2020 08:58  
**To:** Planning Policy  
**Subject:** Anthony and Lisa King, Andrew and Melanie Norris (on behalf of Pegasus Group)  
**Attachments:** Fareham LP 2037 Reprs\_King Norris\_Brook Avenue Warsash\_Dec 2020.pdf; Brook Avenue Representations Feb 2020.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Jeremy Gardiner [REDACTED]  
**Sent:** 18 December 2020 17:22  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** Fareham Local Plan 2037 - Publication Local Plan (reg.19): Representations on behalf of Anthony and Lisa King, Andrew and Melanie Norris regarding land at Brook Avenue, Warsash

Dear Sir or Madam,

On behalf of our clients, Anthony and Lisa King and Andrew and Melanie Norris, please find attached representations on the Publication Local Plan. The representations relate both to the overall plan and to their land at Brook Avenue, Warsash (SHELAA site ID 3050) which is proposed as a housing allocation for about 25 dwellings.

Also attached for ease of reference are the previous representations submitted regarding this site in February 2020.

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

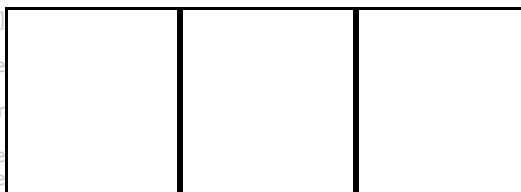


Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



[www.pegasusgroup.co.uk](http://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 AT BROOK AVENUE, WARSASH**

**ON BEHALF OF  
ANTHONY AND LISA KING AND ANDREW AND MELANIE NORRIS**

**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:

<b><u>1.0</u></b>	<b><u>Introduction</u></b> .....	Error! Bookmark not defined.
<b><u>2.0</u></b>	<b><u>Plan Overall</u></b> .....	<b>2</b>
<b><u>3.0</u></b>	<b><u>Specific Proposed Changes</u></b> .....	<b>11</b>
<b><u>4.0</u></b>	<b><u>Participation at the examination hearing sessions</u></b> .....	<b>27</b>

## 1.0 Introduction

- 1.1 The following representations are by Pegasus Group on behalf of our clients, Anthony and Lisa King, and Andrew and Melanie Norris, who own a potential housing site at Brook Avenue, Warsash. For the reasons set out in these representations, our clients are strongly of the view that their land should be allocated for housing development in the local plan.
- 1.2 These representations are consistent with, and build on, the previous representations which were submitted on behalf of Anthony and Lisa King by WYG in relation to the Fareham Draft Local Plan 2036 Supplement in February, 2020. Those previous representations are re-submitted with this representation for ease of reference.
- 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.

	<b>Agent</b>	<b>Client</b>
Title	Mr	Anthony and Lisa
First Name	Jeremy	King and Andrew
Last Name	Gardiner	and Melanie Norris
Job Title	Senior Director	c/o Agent
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 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 16<sup>th</sup> 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 the allocation of our clients' site at Brook Avenue, Warsash.

**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 allocation of our clients' land at Brook Avenue, Warsash.
- 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 DS3: Landscape

- 3.27 This draft policy designates about a quarter of the land area of the Borough as "Areas of Special Landscape Quality" (ASLQ) as shown on Figure 3.3 of the plan. This proposed designation affects our clients' site at Brook Lane, Warsash and all immediately surrounding land except (curiously) the Egmont Nursery site, Brook Avenue, which is a proposed allocation in the PLP and which has outline planning permission for 8 dwellings.
- 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. In our view, **this creation of a potentially irrelevant layer of policy is unnecessary and Policy DS3 should be deleted.**

However, if it is held that Policy DS3 should be retained in the plan, then the following comments apply:

- 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 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 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 many of 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 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 plan is difficult to interpret given its scale but all or part of our clients' site may be 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.

## **Proposed housing allocation – land at Brook Avenue, Warsash**

- 3.59 Our clients' site is identified at Appendix A of the accompanying February 2020 representations. It is SHELAA Site ID 3050 which is assessed as a "Discounted Housing Site" on page 161 of the Council's most recent SHELAA dated September 2020. Here it is confirmed that the site has a gross area of 2.04ha and an estimated yield of 55 dwellings. The site's "Suitability" (for development) was assessed as follows:

**"Constraints:** Agricultural Land Grade 3b, Within 500m of SPA, Within 500m of SAC, Within 500m of Ramsar, Within 500m of SSSI, Countryside.

**Highways / Pedestrian access:** Access from the south would be unacceptable as the link to Brook Lane is narrow. Access from the north onto Brook Avenue is considered feasible. Footway provision along Brook Avenue would be required to Brook Lane.

**Conservation Comments:** No known constraints.

**Noise / Air Quality Assessment:** No issues.

**Archaeology:** Site not within identified area of archaeological potential.

**Ecology Comment:** The site contains an improved grassland field with boundary vegetation, which could be utilised by foraging and commuting bats, reptiles, dormice and breeding birds. Issues arising from increased recreation within the SINC will need to be considered. Protection and enhancement of the boundary vegetation is required.

**Accessible Facility Types 6/10:** Within 1600m of a Secondary School, within 800m of a Convenience Store or Supermarket, within 400m of a High Frequency Bus Stops, within 800m of a Accessible Green or Play Space, within 1200m of a Primary School, within 1600m of a Town/District or Local Centre.

**Reason for Discounting:** Development of scale promoted would not be in keeping with the settlement pattern.

**Is the site suitable?** No

**Is the site available?** Yes

**Is the site considered achievable?** Yes"

Our comments:

The site is considered to be available and achievable for housing, but not suitable. This appears to be an illogical conclusion from the assessment

provided, particularly when account is taken of other planning permissions and allocations in the immediate area.

Proximity to the SPA/SAC/Ramsar and SSSI are not objections in principle to development in this location – as evidenced by the planning permission for housing at Egmont Nursery to the west of our clients' land (so closer to European designated sites) and the allocation of the "Warsash cluster" of housing sites north and south of Greenaway Lane a short distance to the east.

Access is available from Brook Avenue to the north.

There are no conservation, archaeology, noise or air quality constraints.

The site offers some ecological potential but this can be mitigated.

The site is sustainably located within walking distances of secondary and primary schools, local services and facilities including convenience shopping and a high frequency bus route.

Therefore, it appears that the only reason it was not allocated for housing was because the estimated yield of 55 dwellings was held to be not *"in keeping with the settlement pattern"*. The site's area is 2.04ha, so a scheme of 55 dwellings would be at a density of about 27 dwellings per hectare, a relatively low density.

To the east of the site are consolidated frontages of suburban housing fronting Brook Lane and Brook Avenue, but to the west housing along Brook Avenue is of lower density and is more sporadic.

In this context, it is suggested that the density of housing development should reduce east to west across the site, that the site should be allocated for "about 25 dwellings", but that its capacity should be confirmed through a detailed assessment of its constraints and the preparation of a feasibility layout.

For these reasons, the Council is encouraged to allocate our clients' site at Brook Avenue, Warsash for about 25 dwellings. Our clients have received many expressions of interest in their land from housing

developers, such that the site is deliverable in the short term and can make a modest though 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)?**

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.

# **Fareham Draft Local Plan 2036 Supplement Representations**

## **Land at Brook Avenue, Warsash**

**Prepared on behalf of Lisa and Anthony King  
February 2020**



## Document control

Document:	Fareham Local Plan Supplement Representations	
Project:	Fareham Local Plan Supplement Representations: Brook Avenue	
Client:	Lisa King and Anthony King	
Job Number:	HP11039-A074500	
File Origin:		
Revision:	V1	
Date:	27 February 2020	
Prepared by SH	Checked by N/A	Approved by N/A
Description of Revision		
Revision:	Final	
Date:	29 February 2020	
Prepared by SH	Checked by CL	Approved by CL

## **Contents**

- 1.0 Introduction
- 2.0 Local Plan 2036 Supplement
- 3.0 Interim Sustainability Appraisal
- 4.0 Strategic Housing and Employment Land Availability Assessment
- 5.0 Interim Draft Infrastructure Delivery Plan
- 6.0 Conclusion

## **Appendices**

- Appendix A Proposed Land Use Plan
- Appendix B Draft Local Plan Representations

## 1.0 Introduction

- 1.1 These representations have been prepared by WYG on behalf of Lisa and Anthony King, Andrew Norris and Melanie Norris, who own a site at Brook Avenue, Warsash. The site extends to 2.04 hectares and comprises two adjoining fields which are currently used for the keeping of horses. Historically, the fields were used for horticultural purposes. Surrounding land uses are predominantly residential, with some garden nurseries also present to the north of the site. The built-up nature of the locality can be seen on the proposed land use plan at Appendix A, submitted to the Council as part of the 2018 SHELAA submission.
- 1.2 These representations relate to Fareham Borough Council's Regulation 18 consultation on the Draft Local Plan 2036 Supplement and supporting evidence documents, comprising the following:
- Interim Sustainability Appraisal
  - Strategic Housing and Employment Land Availability Assessment
  - Infrastructure Delivery Plan
  - Interim Transport Modelling Outputs
  - Employment Study
  - Viability Study
- 1.3 The site has previously been promoted to Fareham Borough Council by WYG, through the Council's Call for Sites and Local Plan consultations. The site, which is considered under Site ID 3050, has previously been considered suitable, available and achievable. These previous submissions remain valid and relevant and should be considered alongside these representations.
- 1.4 These representations consider the Local Plan Supplement and the supporting evidence base, which are the subject of a Regulation 18 Consultation which runs from 13 January to 1 March 2020. The representations address each of the relevant documents in turn, insofar as they relate to Land at Brook Avenue.

## 2.0 Local Plan 2036 Supplement

2.1 The Supplement has been produced in response to the Summer 2019 Issues and Options consultation and is intended as a supplement to, rather than a replacement of, the Draft Local Plan (2017). The Supplement sets out:

1. Detail of the revised development strategy
2. Further proposed development allocations
3. Additional policies to ensure compliance with NPPF

### The Revised Development Strategy

2.2 The revised development strategy introduces, amongst other things, special landscape quality designations, revised strategic gaps and two strategic growth areas, with the overarching aim of providing, "sufficient suitable, available and achievable sites in order to meet the housing need". While this over-arching aim is supported, my clients object to the special landscape character designation introduced through the Local Plan Supplement. The site at Brook Avenue is a flat field used for grazing, is devoid of trees and as such, does not contribute to the special landscape character or quality of the area. Such a broad-brush application of this designation will conflict with the Council's objective to provide sufficient suitable, available and achievable sites to meet housing need.

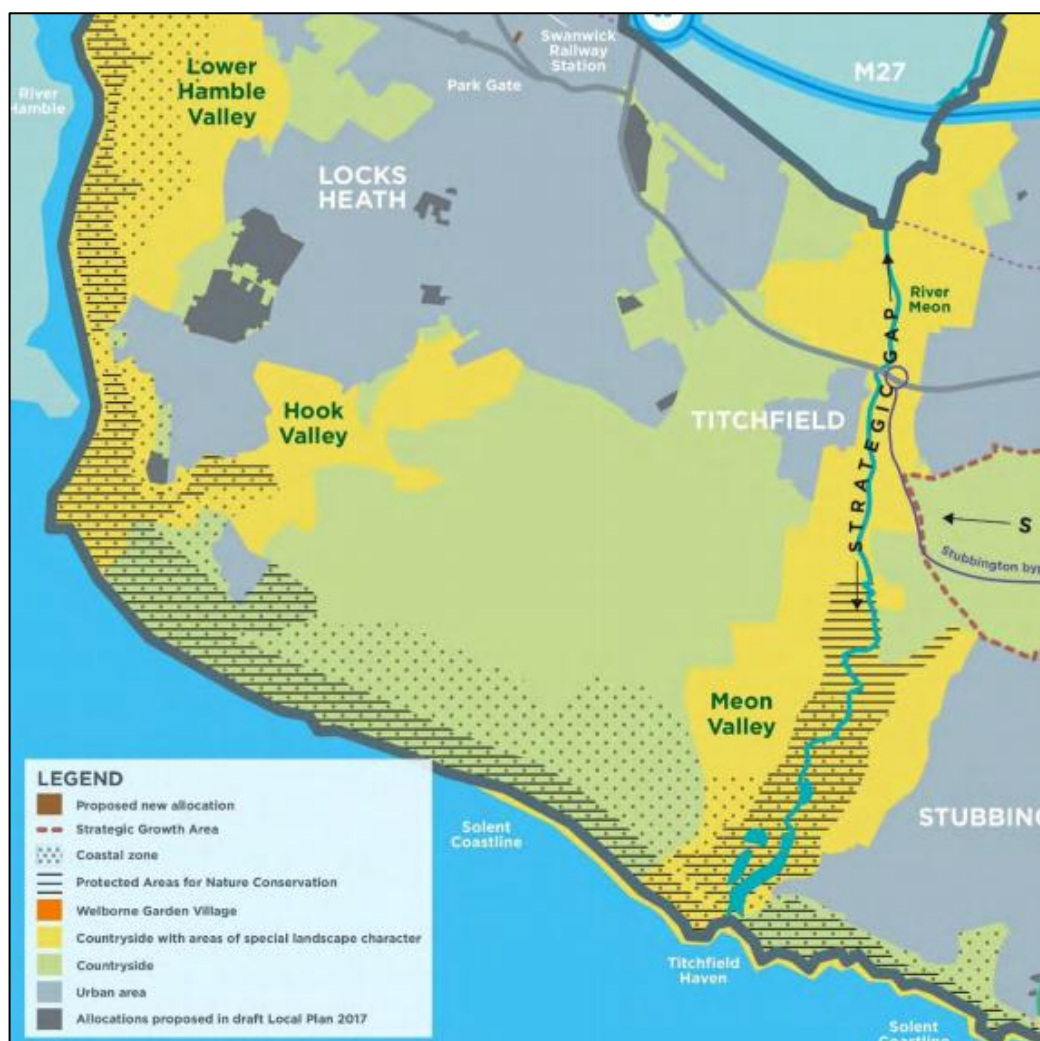
2.3 The Local Plan Supplement confirms that the Borough's housing need, based on the standard methodology, will be fixed at the point of submitting the Local Plan for Examination and will include a buffer of 10 – 15% to allow for unforeseen delays in the delivery of Welbourne. My clients support the recognition that the delivery of Welbourne has the potential to be delayed and as such, there is a need to ensure the Local Plan includes smaller, less constrained sites which can be delivered within the early part of the plan period and meet housing need. Land at Brook Avenue is a suitable site to meet this need.

2.4 It is the intention that following consultation, the Draft Local Plan and Local Plan Supplement will be combined to form a single plan. For the reasons set out below, it is considered that the special landscape character designation should be reviewed in future versions of the plan and a less "broad brush" approach taken to its application.

2.5 Representations submitted on the Fareham Local Plan 2036 (Appendix B) set out why the site is considered suitable for development. This resulted in favourable assessments in both the

Council's Strategic Housing Land Availability Assessment and Sustainability Appraisal. No *likely adverse effects* or *likely strong adverse effects* were recorded when assessed against any of the SA objectives. A full assessment of the SA was provided in these previous representations, a copy of which is attached at Appendix B. The conclusions of this assessment remain relevant in the context of the special landscape character designation introduced through the Local Plan Supplement.

- 2.6 The Local Plan 2036 Supplement designates the Lower Hamble Valley as countryside with areas of special landscape character, as shown in Figure 1 below. This designation runs north-south along the eastern side of the River Hamble and includes Brook Avenue. While it is acknowledged that land further north is more open in character, Brook Avenue is characterised by built development comprising residential and some commercial uses. Sarisbury Green is directly to the east and Warsash is approximately 500 metres to the south. The site at Brook Avenue, which lacks any distinctive landscape qualities, is surrounded by existing settlements and development and as such, should not be covered by the "landscape of special character" designation.



**Figure 1 Extract from Fareham Local Plan 2036 Supplement**

- 2.7 The proposed Landscape Policy (currently prefixed as NEXX) set out at paragraph 4.17 of the Supplement is too restrictive and does not support the development of sites such as Brook Avenue, which have previously been demonstrated as being suitable, available and achievable, making them appropriate to help meet the Council's overarching aim of delivering a sufficient number of sites to meet housing need.
- 2.8 In conclusion, the owners of Land at Brook Avenue object to the inclusion of their site in the Lower Hamble Valley Area of Special Landscape Character and the restrictive nature of the corresponding policy, which fails to recognise the more developed nature of the locality, the negligible landscape value of the field itself and therefore, the contribution the site could make to Fareham Borough's housing need.

#### Further Proposed Development Allocations

- 2.9 My clients object to the fact that their site at Brook Avenue is not included as a further development allocation in the Local Plan 2036 Supplement, particularly when previous SHLAA and SA assessments have indicated its overall suitability. In addition, officers at Fareham Borough Council have indicated that previous concerns, including access, were not insurmountable.
- 2.10 It is considered that this omission is simply due to the introduction of the landscape designation, which as set out above, is too “broad brush” in its application and does not consider the merits and characteristics of individual sites such as Brook Avenue. Indeed, the Council’s own finer grain analysis in their 2017 Character Assessment states that,

#### *"SENSITIVITY AND DEVELOPMENT POTENTIAL*

*The northern part of area 2.2a (around Brook Avenue) is of lowest sensitivity in terms of settings – further development within this area would form a western extension of the urban area at Sarisbury Green but would be relatively inconspicuous and would not significantly alter perceptions of the character of the urban area or its setting. Strong vegetation cover and local topography mean that it would also not have an impact on the setting of the River Hamble."*

### 3.0 Interim Sustainability Appraisal

3.1 The Interim Sustainability Report (January 2020) includes a Site Options Assessment, which provides an appraisal of borough-wide sites which have been assessed as being suitable for development and are being considered for allocation. This includes sites identified in the Draft Local Plan (2017).

3.2 Land at Brook Avenue, Warsash is assessed under site ID 3050 as shown in Figure 2:

ID: 3050		Name: Land at Brook Avenue, Warsash								
Proposal:		2.0 ha greenfield site outside USB proposed for residential use								
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11
++	+/-	+	+/-	+	++	+/-	-	0	0	+
SA	Commentary									
1	Indicative yield: 27 dwellings									
2	Three Listed Buildings and two historic unlisted buildings within 200m									
3	100% Lower Hamble Valley LCA – High development potential									
4	Falls within 6 accessibility zones									
5	Falls within 6 accessibility zones; not within Flood Zone or Coastal Change Management Area									
6	No known constraints within 100m									
7	Four internationally important features within 1,000m (Solent Maritime SAC / Solent & Southampton Water SPA/Ramsar 446.5m NW, Solent and Dorset Coast pSPA 836.6m W) One nationally important feature within 500m (Lee-on-the Solent to Itchen Estuary SSSI 444.5m NW) No locally important features on site									
8	91.7% ALC Grade 3b, 7.6% Other (post-1988); no other features on site									
9	No employment floorspace proposed									
10	Unlikely to compete with existing or proposed centres									
11	Within 300m of 2 existing/proposed open spaces / allotments									

**Figure 2 Extract from Site Options Appraisal (January 2020)**

3.3 The methodology used to assess the sites is welcomed, particularly as it provides consistency through a quantitative assessment applied to all sites. However, this provides an entirely factual assessment. In the absence of any commentary or recommendations, there is a risk that the site selection process is over-simplified and is based on the "score" for each site.

3.4 The assessment demonstrates that the site can make an important contribution to housing delivery, particularly as a smaller site capable of delivering new homes in the next 5 years. As



set out in previous Local Plan representations, the site is capable of delivering up to 55 dwellings and this figure should be referenced in future iterations of the SA, together with the strong positive effect this would have on SA objective 1 (To provide good quality and sustainable housing for all).

- 3.5 The assessment notes that the site falls within the Lower Hamble Valley LCA, but importantly also notes that it has “high development potential” under SA objective 3. This is particularly significant in the context of my client’s objection set out in Section 2 of these representations and provides further justification for the removal of the designation from the site at Brook Avenue.
- 3.6 It is noted that a negative assessment has been recorded in respect of SA objective 8 (natural resources). However, it is also noted that the ALC is 3b. This classification, combined with the relatively small site area when considered for agricultural purposes, means that this negative assessment should not be considered as a constraint to development.

## **4.0 Strategic Housing and Employment Land Availability Assessment (SHELAA) December 2019**

- 4.1 The SHELAA discounts site reference 3050 (Land at Brook Avenue, Warsash) for residential development. The reason for discounting is:

*"The site is in a highly sensitive landscape (based on the Fareham Landscape Assessment). For these reasons the site is unsuitable for residential development."*

- 4.2 This reason contradicts the assessment in the Sustainability Appraisal and previous findings from the Fareham Landscape Assessment 2017, set out above and repeated here for emphasis:

*"The northern part of area 2.2a (around Brook Avenue) is of lowest sensitivity in terms of settings – further development within this area would form a western extension of the urban area at Sarisbury Green but would be relatively inconspicuous and would not significantly alter perceptions of the character of the urban area or its setting. Strong vegetation cover and local topography mean that it would also not have an impact on the setting of the River Hamble."*

- 4.3 The owners of land at Brook Avenue therefore object to the conclusion in the SHELAA (2019) that the site should be discounted due to the, "highly sensitive landscape". This is not evidenced or justified and as such, the site should not be discounted for residential purposes. Instead, the conclusion should be replaced with that from the previous SHLAA (October 2017) which confirmed that the site is suitable for housing development and that it is both available and achievable.

## **5.0 INTERIM DRAFT INFRASTRUCTURE DELIVERY PLAN**

- 5.1 My clients note the intention for the IDP to be a “Live Document” which will be updated as part of the ongoing local plan process and following discussions with infrastructure providers. However, the intention to provide the specific infrastructure requirements of each of the proposed allocations, during the spring/summer 2020 and submitted as part of the evidence base to the Publication version of the plan, is welcomed. This will help provide certainty for developers and ensure that any on-site infrastructure requirements can be designed into a proposal at the earliest opportunity. Likewise, increased certainty regarding financial contributions would be welcomed. Concerns would be raised if the nature of a “Live Document” undermines this certainty and the ability to identify infrastructure requirements and contributions at an early stage of the development process, particularly on smaller development sites where viability is often more constrained.

## 6.0 CONCLUSION

- 6.1 The owners of the site, the subject of these representations, object to the exclusion of Land at Brook Lane as a further allocation in the Fareham Local Plan 2036 Supplement.
- 6.2 As set out in these representations, the “broad brush” application of the special landscape quality designation is not evidenced or justified. As such, when applied to sites such as that at Brook Avenue, it conflicts with the Council’s overarching aim to provide, “sufficient suitable, available and achievable sites in order to meet the housing need”. Land at Brook Avenue is suitable, available and achievable and it is therefore considered that the designation should be reviewed to enable Land at Brook Avenue to help meet the Borough’s housing need.



## Appendix B

### Representation on the Fareham Local Plan 2036: Land at Brook Avenue, Warsash (SHLAA ID: 3050)

#### 1.0 Introduction

- 1.1 WYG Planning and Environment has been instructed to submit a representation on the Fareham Local Plan 2036. Specifically, this seeks to promote the Land at Brook Avenue site in Warsash (SHLAA ID: 3050).
- 1.2 Land at Brook Avenue is a 2.04 ha site comprising two fields that are currently used for the keeping of horses. Historically, these fields were used for horticultural purposes. Surrounding land uses are predominantly residential with some garden nurseries also present to the north of the site.

#### 2.0 Land at Brook Avenue, Warsash

- 2.1 This site was submitted as part of the Fareham Borough Council Call for Sites exercise in December 2011 and most recently in December 2015.
- 2.2 The Strategic Housing Land Availability Assessment (SHLAA) (October 2017), a key evidence base document for the Local Plan 2036, assesses this site and concludes that it is a suitable site for housing development that is both available and achievable.
- 2.3 The site was also appraised in the Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017), another key evidence base document.
- 2.4 In particular, the site is considered to have a '*likely strong positive effect*' when assessed against the following SEA Objectives:
  - SEA1: To provide good quality and sustainable housing for all.
  - SEA6: To minimise air, water, light and noise pollution.
- 2.5 A '*likely positive effect*' was scored against the following assessment criteria:
  - SEA3: To conserve and enhance the character of the landscape.
  - SEA5: To minimise carbon emissions and promote adaptation to climate change.
  - SEA11: To create a healthy and safe community.

- 2.6 It is important to note that this assessment does not consider that the site is likely to have '*likely adverse effects*' or '*likely strong adverse effects*' when assessed according to any of the SEA objectives.
- 2.7 The Housing Site Selection Background Paper (October 2017) acknowledges the positive assessment of the site concluding that: '*Overall the site has a good SA outcome. The site would require careful consideration for pedestrian access and highway lighting which may alter the character of the immediate area. The site would also not provide a defensible or clear urban boundary into the future. There are other developable sites that contribute more favourably to the Site Selection Priorities which includes the site north and south of Greenway Lane*'. These comments are discussed further in the following paragraphs.
- 2.8 Highways safety has not been raised as a concern in any of the evidence base documents that support the Fareham Local Plan 2036 and as set out in our submissions as part of the Call for Sites exercise, there are a number of options for accessing the site. The points relating to pedestrian access and highway lighting within the Housing Site Selection Background Paper (October 2017) have been noted and will be considered in full as proposals for this site progresses further. These are not however, considered to be insurmountable issues that would prevent an allocation on this site coming forward.
- 2.9 The Housing Site Selection Background Paper (October 2017) also advises that the site would: '*...also not provide a defensible or clear urban boundary into the future*'. This is not considered to be a reasonable justification for discounting this site for allocation within the Local Plan 2036. It is common for urban area boundaries to be amended when new site allocations are proposed and there is no reason why the urban area boundary for Warsash could not be amended if Land at Brook Avenue were included in the plan as a site allocation for housing.
- 2.10 Furthermore, the Housing Site Selection Background Paper (October 2017) advises that the site has been discounted as: '*There are other developable sites that contribute more favourably to the Site Selection Priorities*'. This is disputed as a number of allocated sites perform less favourably within the Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017) as detailed in their individual assessments in this evidence base document. The following paragraphs provide a couple of examples.
- 2.11 Site allocation HA10: Funtley Road South is considered to have negative effects when assessed against:
- SEA3: To conserve and enhance the character of the landscape.

- SEA4: To promote accessibility and encourage travel by sustainable means.
- SEA7: To conserve and enhance biodiversity.

2.12 Site allocation HA18: Funtley Road North is considered to have the following negative effects:

- SEA3: To conserve and enhance the character of the landscape.
- SEA4: To promote accessibility and encourage travel by sustainable means.
- SEA8: To conserve and manage natural resources (water, land, minerals, agricultural land, materials).

2.13 Site allocation HA5: Romsey Avenue is considered to have the following negative effects:

- SEA8: To conserve and manage natural resources (water, land, minerals, agricultural land, materials).

2.14 Site allocation HA12: Moraunt Drive is considered to have the following negative effects:

- SEA3: To conserve and enhance the character of the landscape.
- SEA11: To create a healthy and safe community.

2.15 It is apparent that a number of proposed allocations perform less favourably in sustainability terms, potentially giving rise to adverse impacts relating to landscape, accessibility, biodiversity, use of natural resources and the provision of healthy and safe communities. Land East of Brook Avenue scores highly in the supporting Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017) and constitutes a more appropriate site for residential allocation than several of the proposed allocations.

2.16 This site is promoted for a yield of approximately 48 dwellings on a developable area of approximately 1.6 ha. This would facilitate the provision of the required amount of open space on this site whilst still providing sufficient space to accommodate residential development at 30 dph. It is noted that there are no specific site constraints that may further impact on the proposed yield.

### 3.0 Deliverability

3.1 With regards to deliverability, the site owners are committed to delivering the site in a timely manner and there are no site constraints that would prevent development being delivered quickly.



- 3.2 At the intended delivery rate, this site could contribute 48 dwellings towards the 5YHLS shortfall and is therefore, deliverable in the short term. This is contrary to the proposed delivery of housing in the draft Local Plan which states that Welborne and other large housing allocations: *'...will take several years to complete. This will result in a natural delivery of homes focussed in the middle and latter points of the plan period'*.
- 3.3 The proposed stepped delivery rate means that the past under-supply of dwellings against OAN in the first six years of the plan will only start to be addressed in five years time when annual delivery rates are projected to exceed the OAN figure (420 dpa). This approach does not accord with advice from the Government which states that: *'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to co-operate'* (NPPG Paragraph: 035, Reference ID: 3-035-20140306). As such, it is considered that the draft Local Plan fails to properly plan for housing needs in the Borough at the appropriate time and that proposed policy H1: Strategic Housing Provision and DA1: Development Allocations are both unsound in this respect.

## **4.0 Conclusion**

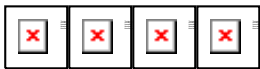
- 4.1 Land at Brook Avenue is a deliverable site that could provide much-needed housing within the Borough over the next five years, responding to the current 5YHLS shortfall. There are no significant site constraints that would prevent development coming forward on this site and evidence base documents supporting the Local Plan 2036 clearly indicate that the site scores highly in terms of sustainability, providing more benefits than some of the proposed site allocations. As such, this site should be allocated for residential development in as part of Policy DA1: Development Allocations.

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 21 December 2020 08:59  
**To:** Planning Policy  
**Subject:** Persimmon Homes response  
**Attachments:** Mimecast Large File Send Instructions

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Ramirez, Daniel <[REDACTED]>  
**Sent:** 18 December 2020 22:00  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Cc:** Wootton, Gayle <[REDACTED]>  
**Subject:** Fareham Borough Draft Local Plan 2036 (Regulation 19) Consultation - Representations on Behalf of Persimmon Homes (South Coast).

I'm using Mimecast to share large files with you. Please see the attached instructions.

---

Dear Local Plans Team,

Please find attached representations towards the Fareham Borough Draft Local Plan 2036 Publication Draft (Regulation 19) consultation on behalf of Persimmon Homes (South Coast).

I kindly request that officers acknowledge receipt of the email and the attachments.

Should officers have any queries regarding these representations please do not hesitate to contact me.

Kind regards,

Daniel Ramirez  
Strategic Planning Manager  
**Persimmon Homes South Coast**  
Park View House  
100 Wickham Road  
Fareham  
Hampshire  
PO16 7HT



## Disclaimer

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended recipient please

contact the sender and delete the message.

Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

**Representations towards the Fareham  
Borough Draft Local Plan 2036 Publication  
Draft (Regulation 19) Consultation on Behalf  
of Persimmon Homes (South Coast)**

December 2020

## **1. Introduction**

Persimmon welcomes the opportunity to comment on the Fareham Draft Local Plan 2036 (DLP) Publication (Regulation 19) consultation.

This letter is set out in sections as summarised below:

- Section 2 sets out our response to Duty to Cooperate issues
- Section 3 sets out our policy specific responses
- Section 4 sets out our response in relation to Omission Sites

## **2. Duty to Cooperate**

The Duty to Cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, including housing.

Planning Practice Guidance recommends that authorities should produce, maintain, and update one or more Statement(s) of Common Ground, throughout the plan-making process. The Council has unilaterally produced a 'Statement of Compliance with the Duty to Co-operate' which sets out how the Council claims to have addressed the duty to cooperate, including in relation to addressing the unmet housing need of its neighbouring authorities. This is not an agreed Statement. It is noted that there is little to no explanation within the Statement as to what cross boundary discussions have taken place since the Council has significantly altered its approach with regards to housing need (as detailed below). In Persimmon's view, this information is absent because neighbouring authorities, in particular Portsmouth and Gosport, will not be supportive of Fareham's approach.

As mentioned above, the Council's Regulation 19 consultation document is significantly different from the Regulation 18 draft in terms of its approach to housing. This is largely as a result of it applying the lower Local Housing Need (LHN) as derived from the Government's proposed new Standard Methodology, which has not been approved. The Regulation 18 version of the Plan included a number of Strategic Growth Areas that were identified, in part, to meet the housing needs of neighbouring authorities of Gosport and Portsmouth. These Areas have now been deleted, and do not feature in the Publication Plan.

The Council's decision to use the new Standard Methodology LHN in order to take advantage of lower housing numbers is premature, and is at odds with the approach being taken by nearly all other Local Planning Authorities developing Local Plans in the sub-region, including Gosport and Portsmouth.

It is understood that the SGAs would met at least 1,000 dwellings from Portsmouth's unmet needs, alongside a proportion of Gosport's (quantum not published). However, the Publication Plan suggests that unmet need accommodated by the Plan will only equate to 847 dwellings. By Fareham choosing to use the draft new Standard Methodology and reducing its housing site allocations as well, the scope for the Plan to pick up the housing needs of these neighbouring council areas has been significantly curtailed.

It is Persimmon's view therefore that, given the significant change in approach by Fareham Council, the joint working that it has undertaken on housing issues to date has been fundamentally undermined to a point where it can only be concluded that Council has failed the duty to cooperate.

## **2. Policy Specific Comments**

### **DEVELOPMENT STRATEGY**

#### **Strategic Policy DS1 Development in the Countryside**

Policy DS1 provides the policy basis for the delineation of settlement boundaries. In the context of our comments below, notably in relation to not meeting housing need, omission sites and the delineation of Strategic Gaps, the Council should amend the settlement boundaries to allow additional development to come forward.

With regards to the criterion d) of Policy DS1, an allowance for new or replacement building, conversion and/or extension of a school is welcomed. However, the Policy appears to limit re-provision to existing sites shown on the Policies Map. As set out in greater detail in the our response to Policy DS2 and the Omission Site section, discussions are on-going with the Meoncross school to facilitate expansion of the car park and/or playing fields in the short term. The potential relocation of the school to other land within Persimmon's interest at Cuckoo Lane over the longer-term is also being explored. As currently drafted, by strictly limiting development to within an existing educational facility, the Policy would prevent such future improvements and the possible relocation of Meoncross School.

#### **Strategic Policy DS2 Development in Gaps**

The Council has commissioned Hampshire County Council to review its Strategic Gaps. The County's methodology for this review is set out in the Technical Review of Areas of Special Landscape Quality and Strategic Gaps (September 2020). This applies 'Primary Measures' (i.e. physical and visual separation) and 'Secondary Measures' (i.e. Green Infrastructure Provision) to define the gaps. We support the inclusion of physical and visual separation as a means of determining the gap boundary, but we see no justification for including the secondary measures as this is outside of the scope of the role of a gap. In any case, Green Infrastructure is an issue that is dealt with separately under Policy NE9 of the draft Plan.

The following commentary on this policy considers each of the Strategic Gaps before comments are made on the content of Policy DS2 itself.

#### **The Fareham-Stubbington Gap**

As set out in the recommendations of the Gap Review paper (Chapter 4: Conclusions and Recommendations, Paragraph 10): *'there exists some opportunities for development to be absorbed within the Stubbington-Fareham Strategic Gap, subject to scale and future detailed design, without compromising its Gap function...'* It is surprising then that the Council has not examined this potential in greater details as part of its Publication draft Local Plan, particularly given that the most recent Regulation 18 Local Plan consultation proposed a Strategic Growth Area (SGA) within this gap as a means of accommodating growth.

It is also surprising that the Gap Review Paper does not adequately consider the influence of the Stubbington by-pass on the Fareham-Stubbington Gap. Paragraph 3 of Chapter 4: Strategic Gaps SG 2: The Fareham-Stubbington Gap states that: *'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.'* The report also states that it is too early to understand the full impact that Stubbington Bypass will have on the landscape character and development pressures of the Gap. This second assertion is contested. Given that the by-pass construction has progressed significantly, and that by-pass proposal has been subject to landscape assessment (including through the ES associated with the application), there is sufficient information available to allow for a robust assessment of the impact of the by-pass on the gap and the landscape to be carried out. A review of the landscape and gap evidence should be carried out prior to submission of the Plan for examination.

There can be no doubt that the by-pass will have a considerable influence on the Fareham-Stubbington Strategic Gap - effectively splitting it two. Once the by-pass is complete, it will form a strong defensible boundary, which will make the difference in the character between areas north and south even more apparent than it is already. This difference in the character requires considered in the Local Plan and its evidence base.

Land to the north of the bypass route is considerably more open in character, with large open fields with limited boundary planting providing prominent views north from the bypass toward the southern urban edge of Fareham, which is well defined by Rowan Way. This area is characterised by a strong sense of tranquillity, and is a much more sensitive landscape that is more befitting of Gap designation in accordance with the Council's own methodology. Land to the south of the bypass, however, comprises considerably more urban influences as demonstrated by existing development along Ranvilles Lane / Titchfield Road, the cemetery south of Oakcroft Land and development around May's Lane / Peak land (including where the urban area of Stubbington protrudes into the gap). This observation is supported by the detailed analysis of gap study area 7a (see Chapter 4: Strategic Gaps SG 2: The Fareham-Stubbington Gap, para 8) which states that:

*'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.**'*  
(Persimmon's emphasis)

Paragraph 11, Bullet 2 of Chapter 4: Strategic Gaps SG 2: The Fareham-Stubbington Gap of the Gap Review evidence reconfirms the limited role that the area to the north west of Stubbington, south of Oakcroft Lane and east of Ranvilles Lane plays as a gap. The Gap study states that this area has *'the ability to absorb development into the landscape exists, without compromising the integrity of the Gap function'*. The Council will be aware of the planning application within this part of the gap (LPA Application Reference: P/20/0522/FP). This application comprises 209 new homes a considerable area of land to the north of the housing and to the south of the by-pass for ecological purposes. The Site Plan is attached to these representations at Appendix 1. The application is a resubmission of a planning application that addresses technical and design issues raised by the Council previously. It is understood that the application is due to be considered by planning committee in January 2021.

One key consideration when reviewing the boundary of a gap is the consideration that no more land should be included in the gap than is necessary (see adopted Core Strategy Policy CS22, Fareham Borough Council Gap Review 2012 and South Hampshire Strategy 2012). This concept is reiterated in the Gap Review Paper as 'minimum land take'. In light of the above, it is Persimmon's view that the gap evidence should be reconsidered with areas north and south of the by-pass assessed separately to take account of the by-pass. For reasons set out above, and in accordance with the Gap Review methodology, it is considered that a review of the evidence would indicate that the land north of the by-pass should be retained as gap and land to the south should be deleted from the gap designation. Retaining a gap to the north would preserve a c. 800m gap between the by-pass and the southern urban edge of Fareham, which is described in the Gap Review Paper as being *'moderate-large gap'* of a *'good distance'* that *'gives the traveller time to experience the countryside after leaving one settlement before joining another.'* Retaining a gap of adequate width in this location is particularly important given the role Peak Lane plays in providing a well utilised north-south link between Stubbington and Fareham.

With regards to land to the east of Stubbington, Paragraph 11, of Chapter 4: Strategic Gaps SG 2: The Fareham-Stubbington Gap of the Gap Review indicates that there is very little opportunity to absorb development in this corridor but that advanced planting along the eastern edge of the settlement would be beneficial. Persimmon Homes have interests in this area (as discussed in detail later in these representations). In summary, the proposals include new residential development, significant new strategic planting and open space along the eastern edge of the site. Discussion are on-going with the

Meoncross School to facilitate expansion of the car park and playing fields in the short term and the potential relocation of the school to other land within Persimmon's interests over the longer-term.

In light of the our comments set out above It is considered that the Fareham-Stubbington Strategic Gap should be redrawn so that land to the south and west of the by-pass is removed from the gap.

Whilst not a gap issue per se, the emerging and previous Local Plans, have tended to avoid allocating any significant growth on the periphery of Stubbington. Sensitively redrawing the gap boundary as suggested above will allow for much needed sustainable development housing to come forward to support the housing aspirations of those wish to live in or remain living in Stubbington.

#### The Meon Strategic Gap

As touched upon above, the function of a Strategic Gap is to prevent the coalescence of separate settlements. Land to the west of Stubbington is identified as a gap but there is no settlement to the west of the Stubbington that requires protection from coalescence. With regards to Strategic Gap Study Area 6, it is noted that the Gap Review study states that this gap is provided to ensure there is no coalescence between Stubbington and Titchfield along Titchfield Road. Whilst this northern most extent of this study area may serve this purpose, the central and southern parts of the Study Area 6 play no role whatsoever in preventing coalescence. This is recognised in Paragraph 13 of Chapter 4: Strategic Gaps SG 1: The Meon Gap of the Gap Review Study. Nonetheless, the Study recommends that the Gap is retained in this area due to: high levels of tranquillity, its role in providing separation of Portsmouth and Southampton, and to recognise the potential longer-term settlement expansion southwards from Titchfield and South Westwards from Hook. Based on the Council's Gap Review methodology, these are not adequate reasons to include this land within the gap.

A more logical delineation of the gap, which would ensure that no more land than necessary is included within it, could be to end its southernmost extent at Crofton Manor Equestrian Centre where the transition from countryside to urban (as part of Stubbington) becomes apparent. As recognised in the Gap review study, much of the land to the south of the Equestrian Centre is subject to protection under draft Policy DS3 (as discussed below), and ecological constraints which provide adequate protection against inappropriate development in this area. A gap is therefore not necessary.

#### General Comments on Policy DS2

Notwithstanding our comments above, in our considered view, Policy DS2 is too restrictive. There may be a point within the plan period, for example where the Council is unable to demonstrate a sufficient five year housing land supply, where additional housing may be required over and above those sites identified in the Plan. The Council has persistently struggled to demonstrate a sufficient five year housing land supply in recent years so flexibility in the Policy is required.

As demonstrated through the Council's Regulation 18 draft Plan, a sustainable location for such development may be in the Strategic Gap between Stubbington and Fareham. As such, the Policy should include additional wording to allow for appropriate and sustainable development in the Strategic Gap in such circumstances where housing supply needs to be increased.

The Policy also seeks to prevent development in Strategic Gaps that may significantly affect its 'integrity' and the 'distinctive nature of settlement characters'. This is a highly subjective policy criteria that will be challenging to interpret by decision-makers and applicants alike. The reference to 'integrity' and the 'distinctive nature of settlement characters' should be deleted from the Policy. The function of a Strategic Gap is to prevent the coalescence of separate settlements, which can be achieved through assessment of the impact of a proposed development on the physical and visual separation of settlements. The other policy criteria are superfluous.

In light of the above, it is considered that the Strategic Policy DS2 - Development in gaps and delineation of the Gap as shown on the draft Policies Map, should be redrawn as set out above. If this is not the case the Policy cannot be said to either justified or effective and is therefore unsound.



### **Strategic Policy DS3: Landscape**

Policy DS3: Landscape identifies a number of Areas of Special Landscape Quality (ASLQ), including the Meon Valley. This is new Policy that does not form part of the adopted Local Plan. The first part of this Policy seeks to significantly restrict development in the Meon valley area. However, considering that the Council has successfully defended the Meon Valley area from a number of hostile planning applications in the recent past without this Policy in place, the justification for it is questionable. Given the prohibitive nature of Policy DS3, the development potential of Site 5 (Cuckoo Lane) for housing and new school provision, will unlikely be realised unless the site is allocated for development in the Local Plan and/or the site is excluded from the Meon Valley ASLQ designation.

## **HOUSING POLICIES**

### **Strategic Policy H1 Housing Provision**

As mentioned in the Duty to Co-operate section above, the Council is applying the Government's former draft Standard Methodology to arrive at its LHN (403 dpa) as opposed to the current Standard Methodology (514 dpa). The draft Standard Methodology is not Government Policy, it is only a consultation draft. The Government has recently (16<sup>th</sup> December 2020) released revised LHN figures that indicate that the Council's baseline LHN will increase to 514dpa. This increase LHN to exactly the same figure as per the current Standard Methodology. This newly published data clearly undermines the Council's premature decision to use the lower LHN figure. It is also noted that when the current and new LHN figures for Gosport and Southampton are considered both Councils are facing an increase in LHN of 106 dpa and 315 dpa, respectively. This is significant as both of these Authorities may need to look to Fareham to accommodate unmet housing needs. This will place even greater pressure on Fareham Borough Council to increase its housing requirement set out in Policy H1. For completeness, Portsmouth's LHN remains unchanged between the two data sets.

Notwithstanding, our concerns that the Council has failed the legal test with regards to the duty to cooperate, Policy H1 cannot be assumed to be sound as undershoots current and emerging LHN. The Plan cannot therefore be considered consistent with national policy and it is not positively prepared. Should the Council seek to amend its housing requirement (for example using the current Standard Methodology) and make consequential changes to its supply sites, re-consultation on a revised Regulation 19 Plan will be necessary.

Policy H1 includes an estimated 1,224 windfall dwellings. The Council's Housing Windfall Projections Background Paper (June 2020) does not provide a detailed breakdown of which sites are being considered as windfall. The Council's figures cannot therefore be scrutinised. Until such time as the Council publishes this detail underpinning the windfall allowance, this element of the supply should not be counted towards the Council's housing requirement.

The Policy also looks to implement a stepped housing requirement, which backloads housing delivery towards the latter part of the Plan period. This approach is at odds with the NPPF's objective to boost the supply of housing and appears not be justified by the expected rate of delivery of sites as set out in the summary housing trajectory in Appendix B of the Plan. For example, in the first period (2021/22 and 2025/26) the Council proposes a requirement of 2,250 dwellings (averaging 450 dwellings per annum). However its housing trajectory suggests that 3,085 dwellings will be delivered, which is equivalent to 617dpa. As such, Policy H1 should be expressed as an average requirement; it should not be stepped.

The Policy also sets out that approximately 428 homes will be delivered on specified brownfield sites and/or regeneration opportunities in Fareham Town Centre. In some cases deliverability, viability availability (i.e. in existing use) is not assured (notably sites FTC2-5). Whilst Local Plans should be aspiration, they should also be deliverable. Allied to above, a further 1,327 homes are identified on Housing Allocation sites (i.e. allocation prefixed with a HA reference). However, a number of these sites are rolled forward allocations from the current adopted Local Plan, and in some cases (i.e. HA29 and HA30) are sites that formed part of the Western Wards growth area that were originally identified

in the 1970's, but have failed to be delivered. As such, it is questionable whether the Council has properly assessed deliverability / developability of some of the sites comprising its supply. It is advisable therefore that the quantum of housing expected from some of the questionable supply sites should not be counted against the housing requirement in the Plan, and alternative sites (such as those set out in the Omission Sites section) should be identified to ensure the Council's housing requirements are met. In addition to the above, the deliverability issues associated with Welborne are well documented. Recently it is understood that due to delays in the site coming forward, the Council has lost external funding to deliver critical highway improvement works. This further underscores the challenges associated with this site. The Council would be well advised to take a highly cautious approach when seeking to include housing supply from Welborne. The draft Plan currently includes 4,020 dwellings as part of the housing supply. In light of the above, this figure is considered to be highly optimistic and should be revised downwards.

Notwithstanding, our concerns regarding the Council's choice of LHN, this figure should be regarded as the starting point for developing the Plan's housing requirement. Councils are advised through national planning policy/ guidance to consider whether any adjustments should be made to the LHN figure to account for other factors such as economic growth (which appears to be absent from the Plan) and unmet need from neighbouring authorities (as discussed above). With regards to affordable housing, the Council commissioned a Housing Needs Survey as part of its previous Regulation 18 consultation draft Plan in 2017. At the time, the Survey suggested that there is a net affordable housing need of 302 dpa (i.e. nearly ¼ of the overall annual requirement). Whilst the Standard Methodology accounts for affordability (or lack thereof in Fareham's case), actual affordable housing need indicates that a further uplift to its LHN may be necessary.

#### **Policy HP4 Five-Year Housing Land Supply**

Policy HP4 states that development 'may be' permitted where a development meet all the criteria in policy HP4. The Policy should be reworded to positively state that a development 'will be' permitted if it meets the policy criteria. When determining planning applications, the decision maker is required to read the Local Plan as a whole; there is no reason for the Policy to be equivocal on this matter.

With regards to criterion (b) the policy states that a development should be '...integrated with the neighbouring settlement'. Does this mean a physical link between the development and the adjoining settlement or that a development should be integrated in design terms? This needs to be clarified.

Criterion c) seeks to prevent development in strategic gaps that may significantly affect its integrity. As per our comments in respect of Policy DS2, this is a highly subjective policy criteria that will be challenging to interpret by decision-makers and applicants alike. It is also noted that Policy DS2 sets out different policy requirement with regards to the protection of Strategic Gap (i.e. proposals should not affect the physical and visual separation of settlements). This has the potential to create an internal conflict within the Plan as it is unclear which policy requirements (either HP4 or DS2) would take precedent where the Council unable to demonstrate adequate five year supply. It is suggested therefore that the wording for Criterion c) is deleted or replaced with a cross reference to Policy DS2 (including Permission's suggested amendment to this DS2).

#### **Policy HP5 Provision of Affordable Housing**

With respect to the percentages of affordable housing sought at sites, Policy HP5 should include a viability review mechanism to provide flexibility. This will assist with the viability of schemes should there be a fall in market over the lifetime of the Plan and/or in circumstance where unknown development costs are introduced (nitrate mitigation costs associated with the HRA requirements are a case in point having seriously affected the viability of schemes over the past year or so).

As set out in the supporting text to this Policy (paragraph 5.32), the Council publishes on its website the identified affordable housing need by area of the Borough. The Council's website shows considerably different housing need for each area. The affordable tenure mix is therefore too prescriptive and does not reflect the Council's own evidence base. It is advisable therefore that the

Council replaces criteria i-ii with a statement confirming that affordable housing mix and tenure will be negotiated with the Council evidence base set out its webpage used as the starting point.

Further underscoring our concerns with the nature of the tenure mix, the Council should be aware of the potential practical challenges associated such a small percentage of Affordable Home Ownership. The Policy could be interpreted by officer so that Affordable Home Ownership is provided at 10%, which would be a challenge for reasons set out below. Registered Providers are becoming ever specialised with some only dealing with the shared ownership side and others the rented side. Requiring such a small percentage of Affordable Home Ownership products through this Policy may create challenges in terms the viability of tender bids for this type of unit. In addition, Affordable Home Ownership, including shared ownership schemes, have been shown to be an effective means of getting people on the property ladder. As the Council's own evidence shows 10% is considerably below what is actually needed.

The final element of Policy HP5 addresses the market rent of Affordable Rented units, which will be judged as 80% of market rent or the relevant Local Housing Allowance (LHA), whichever is lower. The NPPF only make provision for rent to be set at 80% of market. It does not state that market rents should be benchmarked against LHA. The reference to LHA should be deleted to ensure that HP5 is in conformity with national policy.

It is also noted in Paragraph 5.42 of the supporting text to HP5 that the Council may need review the Affordable Housing Supplementary Planning Document (SPD) to address changes to the affordable housing and mix. SPDs should not be used to review issues that have a direct impact on viability. This should be tested through the Local Plan review process.

#### **Policy HP7 Adaptable and Accessible Dwellings**

The PPG sets out a number of tests against which Councils should consider when seeking to introduce M4(2) and M4(3) policies into its Local Plans. The Council's Specialist Housing Background Paper (September 2020) has been produced which shows how the Council claims to have met these tests.

In terms of need, the Background Paper sets out the population with Long Term Health Problem or Disability based on census data. However, this measures population, not households, so should not be assumed to an accurate proxy for need. It should also be noted that some people who state that they may have a Long Term Health Problem or Disability as part of a Census response may not have an illness that would affect mobility and would not therefore not necessarily require M4(2) or M4(3) dwellings. The evidence base should be updated to reflect the above.

With regards to the provision of Category 3 specifically, the Council's evidence of need is weak being based on a national wheelchair usage that may not reflect the level of need in Fareham Borough. Furthermore, with regards to Category 3 affordable housing, from a practical point of view, Registered Providers are less willing to take on wheelchair dwellings as they can be difficult to occupy. If there is no suitable occupier then the unit could be sat empty for a significant period while a suitable occupier is found. During this time the unit is not generating any income, and could have been used to house a family that is in need at the time.

As the Council correctly identifies, a large proportion of older homeowners will seek to remain within their own homes with care provided in situ. Should these owner occupiers need to downsize or relocate they will be able to utilise the equity built up within their dwellings to access products which meet their specific. This may be sheltered or extra care accommodation. Within recent years, as this market has developed, the industry has responded with a number of private sheltered accommodation schemes approved within Fareham. In this context, the Local Plan also looks to facilitate the delivery of specialist housing through Policy HP8 and through specific housing allocations made in the Plan (HA42 – HA43). The Background Paper does not appear to have factored in the supply of specialist homes that may come forward be on allocated sites and windfall sites permissible under Policy HP8.

With regards to the second test relating to location of specialist housing, as set out HP8, this type of accommodation is best located in accessible locations. Given the mobility challenges which some older people face, town and district centres, with their conveniently located services such as shops and health facilities, are ideal locations for older persons housing. Fareham town centre is a highly accessible location where a significant quantum of flatted housing is proposed with the benefit of a reduced affordable housing policy requirement. District Centres are also highly accessible locations where there is a potential for older persons housing could be delivered. The Council should therefore consider restricting this Policy requirement to areas of high accessibility.

### **Policy HP9 Self Build and Custom Homes**

Policy HP9 sets out a policy requirement for 10% of all units on sites over 40 dwellings to provide plots for sale to address local self or custom build need. It is noted, however, that at Paragraph 5.8 of the Council's Self and Custom Build Housing Background Paper (September 2020) it is stated that the Council has met its past and future self-build requirements – this has been achieved without the need for a specific policy. It is also noted that the adopted Welborne Plan requires some 1% of its housing to be for self / custom build. Set against the current identified need of 35 net plots it would seem excessive to require a policy to further increase self / custom build supply. This could result in significant over provision of a product for which there is no clear market demand. In light of the above, the justification for Policy HP9 is therefore questionable. The policy does include provision for plot to be developed for non-self-build, should they not be taken up, however, this Local Plan has made no assessment about the extent to which this would affect cash flow and the viability of developments. It is Persimmon's view therefore that this Policy should be deleted.

Notwithstanding our overarching concerns regarding the justification for this policy, there are a number of practical considerations that the Plan fails to adequately acknowledge. Criterion a) for example, sets out that self or custom build plots should be serviced. The Policy needs to clarify what is meant by 'serviced'. Does serviced this relate highway access, gas, water, electricity and/or broadband, and to which point should the plots be serviced? Turning to criterion c) it is not clear who would be responsible for setting out the design parameters. Placing a requirement to conform to set parameters could put off some prospective self / custom builders. The requirement to provide self and custom build plots may also have a number of practical and management issue, such as:

- Phasing and completion of the wider site.
- Section 106 contributions due to the exemption that applies to self-build housing.
- Delivery of housing in accordance with paragraph 59 of the NPPF to boost significantly housing supply, where supply on an ad hoc basis by self-builders is likely to be slow compared with the remainder of the site or even not take place at all.
- The reserve matters period running out and needing to be extended.
- Ad-hoc builders turning up outside specified hours of work.
- Storage of materials as there is limited room on plot and storage spills onto the market housing part of the site.
- Purchasers having to stop building due to unemployment/lack of funds.
- Purchaser dissatisfaction where building continues on a site which was expected to finish when they moved in.

## **CLIMATE CHANGE**

### **Strategic Policy CC1 Climate Change**

This Policy states that the 'Council will promote mitigation and adaptation to climate change through...' It is unclear whether the criteria will be sought as part of development proposals, or whether the criteria relate to development delivered by the Council. This requires clarification. If it is the former, the Policy should make clear that the criteria are not requirements but should only be met where it is possible to do so.

## **Policy CC2 Managing Flood Risk and Sustainable Drainage Systems**

Policy CC2 requires all developments to be designed in accordance with the CIRIA C753 SuDS Manual or equivalent national or local guidance. The SuDS manual is, however, only guidance. In Persimmon's experience, strict adherence to the guidance can be problematic as the design of a SUDS system also need to consider design, aesthetics, engineering etc. It is recommended therefore that the wording for this bullet point is prefixed with 'Where possible,' to provide the necessary flexibility.

## **NATURAL ENVIRONMENT**

### **Policy NE2 Biodiversity Net Gain**

Policy NE2 sets out a requirement for site to deliver 10% net gain for biodiversity. The Local Plan viability assessment assumes a cost of £500 per dwelling. This development cost is based on limited evidence and seems low, particularly for greenfield sites (as opposed to brownfield equivalents) which are likely to require significant more extensive measures to achieve a 10% net gain. In many cases, the requirement to achieve BNG is likely to negatively impact on the developable area, resulting in a loss of revenue that negatively impacts on viability, rather than be a cost associated with each individual units per se. In Persimmon's view, the viability evidence to support the introduction of this Policy is inadequate. As mentioned above, meeting BNG at 10% can require considerable land take; on some sites Persimmon has been involved in, BNG has required around 50% of the gross site area. It is not clear whether or to what extent the Council has factored in this 'land hungry' BNG requirement as part of its housing allocations capacity estimates. It is also noted that BNG should be achieved across a site, it is not a requirement to be met at the individual plot level (although this might form part of the BNG solution). As such, supporting text Paragraph 32 is misleading and should be deleted.

### **Policy NE4 Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent**

This is new Policy which sets out Fareham's policy approach to dealing with excessive nutrient (nitrate) loading on protected European sites of ecological importance. However, the Policy is light on detail with insufficient guidance as to how applicants will be able to demonstrate conformity. Given Persimmon's significant experience in dealing with such matters, the Company is aware of how this Policy can be implemented in practice, but for less informed developers/applicants this may be more challenging.

Notwithstanding the above, the Company is aware that the primary means of determining whether a development proposal will be able to demonstrate nutrient neutrality is by producing a nutrient budget using the Natural England Methodology. Given that the Natural England Methodology provides a key evidence base and is fundamental to the implementation of Policy NE4, it is critical that this document is examined in detailed alongside the Local Plan. Of particular concern is that Natural England's Methodology includes a number of onerous stages that result in significantly more mitigation being required than is actually necessary. These provisions include, but are not limited to, housing occupancy rates, internal migration (particularly those households that are occupying new affordable housing) and default permit levels. Furthermore, despite many of steps set out Natural England Methodology taking a precautionary approach to nitrate assessment, an arbitrary buffer of 20% increase in nitrate loading is added at the end of the calculator. This buffer is not required and will further exacerbate the issue of overproviding mitigation land that is not necessary. Lastly, it is noted that the Partnership for South Hampshire has updated the Integrated Water Management Study (IWMS). The IWMS provides a key evidence base underpinning the nitrate assessment work, but the Natural England Methodology does not take into account this new evidence.

### **Policy NE5 Solent Wader and Goose Sites**

Policy NE5 sets out the Council approach to protecting area which are used by Solent Waders and/or Brent Geese. The Policy makes reference to such area as shown on the Policies Map. These

designations are, however, informed by an interactive GIS map provided on the Solent Bird Aware website, which forms a critical evidence base to the development of Policy NE5. It is therefore concerning that, on the same webpage as the bird habitat GIS mapping, members of the public can download a form to report bird sightings. It is not clear whether or to what extent these reported sightings are authenticated / scrutinised by a qualified ecologist. There appears to be wide scope for land to be incorrectly identified as a bird site leading to unnecessary cost being expended to mitigate site, and in the worst cases complete sterilisation of that land. This is certainly the case with a number of sites that are with Persimmon Homes' interests (as detailed later in these representations). There is a concern therefore that the mapping evidence base underpinning Policy NE5 is flawed.

The Policy also does not set provision with regards to bird surveys. The methodology for bird sites allows sites to be identified as habitat even if they are not actually being used by birds. It would seem logical that the policy makes provision for applicant to undertake ecology survey and assessment of bird sites in order to demonstrate the absence or presence of a species. We would recommend that one year's survey data should be sufficient, with further surveys only required if the some activity has been identified at a site.

The Council will also be aware that it is the Solent Bird Aware mapping (not the Policies Map) that is used by consultees (Natural England and the Council's own in-house ecologist), to determine whether a development will impact on any protected bird habitat areas, to avoid any confusion in the future, and to ensure the Policies Map remains in date, it is suggested the Policy Map deletes these designations.

With regards to the criterion a) 'Core and Primary Support Areas' the Policy requires that development on such sites should result in an overall net gain to the Solent Wader and Brent Geese Network. BNG is a requirement of Policy NE2; the concept for which is established in the NPPF. However, Persimmon are unaware of any such requirement in national policy or the evidence base underpinning this policy, for a net gain for specific species, including protected birds.

#### **Policy NE6 Trees, Woodland and Hedgerows**

Point a) of this Policy advises that the 'unnecessary loss' of non-protected trees, hedgerow and woodland should be avoided. It is unclear what 'unnecessary loss' means in practice.

Point b) of the Policy should be a new sentence, and what is meant by the term 'unavoidable' in this context should be clarified.

#### **Policy NE8 Air Quality**

Criteria a) of this policy requires electricity charging infrastructure to be provided as part of new development (excluding Welborne). It is unclear why this Policy is not to be applied to Welborne. Presumably this is because of the impact of such provision on viability. Viability issues associated with EV charging provision are, however, not limited to Welborne.

The Local Plan Viability study includes development cost associated with EV charging as part of £10,000 per plot contingency. Paragraph 5.3.8 of the Study states that, *'it is unclear at stage of writing if or when any of these measures will be required, so [the study takes] a very cautious and conservative approach....'* With regards to the EV charging, Policy NE8 requires such provision; there is no uncertainty as to what is expected of a development proposal. As such, the Viability Study should consider this issue in greater detail and not combine this policy requirement with other unknown cost demands on development. Combining these 'unknowns' a single contingency means that is not possible to scrutinise in detail whether the assumptions made with respect to EV is reliable.

We would highlight that the cost for providing EV charging points is around £500-£600 but this does not include additional costs associated with providing additional sub-stations on larger development sites so that all charging points are capable of being used concurrently (alongside all other energy

demands on a development), and the potential to provide enhanced electricity supply (i.e. off-site upgrades) over and above that required for the units that could challenge a scheme's viability.

As current drafted, this element of the Policy is not justified.

## **TRANSPORT AND OTHER INFRASTRUCTURE**

### **Strategic Policy TIN1 Transport Infrastructure, Policy TIN2 Highway Safety and Road Network and Strategic Policy TIN4: Infrastructure Delivery**

These policies concern development contributions to the delivery of new infrastructure. However, it is considered the funding for such infrastructure may, in many instances, be a matter for CIL.

Notwithstanding, the above, if such Infrastructure is a requirement to make the development acceptable in planning terms, then such contribution need to meet the relevant tests set out in the CIL Regulations. It is no longer appropriate for blanket contribution to be sought by planning authorities. The Policy should be clear on this matter.

With specific reference to TIN2 it is unclear why the Council has chosen not to show the alignment of the Stubbington by-pass on the Policies Map given its strategic importance. This Policies map should be updated to show this route.

## **DESIGN**

### **Policy D1 High Quality Design and Place Making**

Policy D1 makes reference to a number of principles of policy and urban design, but also makes reference to guidance contained in the supporting text. For clarity and avoid any confusion over what is policy and what is supporting, text, it is suggested that this cross reference to the supporting text contained in the policy wording is deleted.

The Council should also review the policy to remove any duplication with other policies in the Plan, for example the section relating nature.

Consideration should also be given as whether the policy needs to be so detailed given that the Council has comprehensive guidance on design set out in its adopted Design SPD.

### **Policy D3: Coordination of Development and Piecemeal Proposal**

This Policy seeks to avoid ransom situations. However, The Council will be aware of case law that prevents it from interfering on private property rights with regard to depressing or prevent returns to a landowners.

### **Policy D4: Water Quality and Resource**

The second part of this policy requires developers to meet the Optional Technical Housing Standard for Water Efficiently (i.e. 110L/person/day). Meeting these Standards should be optional, not required. Whilst the Natural England Nutrient Methodology for the Solent area requires development to meet these standards as a means of addressing nitrate loading, there may be instances where nutrient neutrality can be achieved without doing so. The justification for requiring proposals to meet this standard are inadequate.

### **D5 Space Standards**

The housing standards review introduced the optional space standards which local authorities could adopt by way of reference in their local plans. However, a prerequisite to the adoption of the space standards are the following tests set out in the planning practice guidance (Paragraph: 020 Reference ID: 56-020-20150327).

*“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- **need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’

In order to meet the policy test for the inclusion of the space standards there is a requirement for the council to establish the need for the adoption of the national space standard. To this end, the Council has published a Specialist Housing Background Paper (September 2020). Para 6.7 of Background Paper states most dwellings that have been consented or are awaiting determination are consistent with the 2015 Technical housing standards – nationally described space standard. The Background paper, makes references to the larger plots not meeting this standard, with an example being made of site ref 14/19. However, on the whole most dwellings considered in the Council’s Background Paper, including large units, are meeting the Optional standards. From a need perspective, it would seem as though there is little justification for the introduction of this Policy.

In terms of first part of the viability test, the Council’s Local Plan Viability Study indicates that development viability would not be negatively impacted by the introduction of the standards. This Study, however, is completed at a relatively high level, which makes it difficult to conclude whether this part of the test has been complied with. With regards to the second part of the test, no assessment has been carried out by the Council to demonstrate that the requirement for new development will not negatively impact affordability within the market.

As set out in paragraph 6.10 of the Background Paper, the Council has decided not to set a transition period for the adoption of the national space standards as it is of the view its introduction would not affect viability. For reasons set out above, we do not concur with this assessment, and suggest that a three year grace period is introduced to allow sites that are under a fixed contract to be brought forward. It is also noted that, the Council are looking to apply the draft policies in this Plan, including the requirement for national space standards prior to the examination or adoption of the plan. This contrary to the approach set out in the planning practice guidance. It is not practical to expect development proposals that are currently being considered to suddenly meet space standards.

In light of the above, Policy DS5 is not justified and should be deleted for reasons of soundness.

### **Local Plan Appendices**

Appendix B set out a summary housing trajectory for the sites identified in the Plan. This is inadequate to properly assess the delivery expectation made by the Council with respect to individual sites. To enable proper scrutiny of the trajectory, the Council’s housing trajectory should be broken down by individual sites. This is particularly important because the Council has consistently over-estimated the delivery timescales for key sites. For example, Welborne, which was originally identified in the Core Strategy (2011), was expected to commence delivery in 2014/15. The site has still not achieved an implementable planning permission, and commenced development is still some way off.

### **4. Omission Sites**



The following section provides an overview of the sites in Fareham Borough that are in Persimmon's interests, but have not been identified for allocation. These sites are largely located on the periphery of Stubbington and are within the ownership of the Dunley Estate. The Table below summarises the Dunley land holdings including capacity. The sites are shown on the enclosed Location Plans provided at Appendix 2.

Site Number	Address	Gross Area Acres (Hectares)	Site Capacity Estimate*
1	Land East of Burnt House Lane	23.53 (9.52)	240 - 320
2	Land West of Peak Lane	46.25 (18.72)	TBC
3	Land North of Titchfield Road	4.83 (1.95)	40 - 50
4	Land South of Titchfield Road	2.78 (1.12)	10 - 30
5	Land West of Cuckoo Lane	52.76 (21.35)	150-200
6	Land at Oakcroft Lane	41.04 (16.20)	209
<b>Total</b>		<b>171.19 (69.28)</b>	<b>649 - 809</b>

\*Based on net developable area, not gross area.

Sites 1-3 and Site 6 fall within the South of Fareham SGA that was identified as part of the most recent Regulation 18 draft Plan. The remaining sites (Sites 4 and 5) are located outside of the SGA. The following section addresses each site in turn.

In support of the Draft Local Plan Regulation 19 Plan, the Council updated its Strategic Housing and Employment Land Availability Assessment (SHELAA) in September 2020. This replaces the previous study which published in December 2019. The conclusion of the SHELAA as related to each of the sites shown in the Table above are considered.

#### **Site 1: Land East of Burnt House Lane**

This site is located to the eastern edge of the Stubbington. Persimmon has undertaken some initial capacity testing in relation to Site 1, including an initial highways assessment and masterplanning. The outcome of this work indicates that the site is capable of delivering around 240 to 320 new homes. This accounts for on-site constraints including the provision of a noise attenuation bund, and strategic planting to the eastern and northern boundaries of the site. Adjacent to this site is the Meoncross School, which is seeking alternative arrangements for playing pitches close to the school (the existing pitches are currently leased and do not adjoin the school) and additional car parking to avoid parents parking on the nearby residential streets. Persimmon is in discussion with the school about how development at the Burnt House Lane may assist in addressing the school's immediate needs. In the longer term, however, given that the school is unable to expand within its existing site, consideration is being given as to whether the facility could be relocated to the Cuckoo Lane site (Site 5) to the west of Stubbington. The Council is strongly of the view that the site is sustainable and suitable for development and it is capable of being brought forward as a standalone allocation site, or as part of a wider masterplan with the South of Fareham SGA, should the Council seek to revisit this project.

The SHELAA 2019 concluded that Site 1 (SHELAA Ref: 1040) was deliverable housing site. However, in the Council SHELAA 2020 the Council considers the site to be undeliverable due a) to a significant visual impact undermining the integrity of the Strategic Gap, and b) the site being classified as a Low Use Brent Geese and Solent Waders site with no evidence of a strategy compliant solution. The

Council ascribes a capacity of 125 dwellings to the site. It is unclear how the Council has reached the conclusions in the new SHELAA given its assessment of the 2019 SHELAA undertaken just nine months prior. Notwithstanding this, as set in these representations, it is Persimmon's view that the Strategic Gap should be redrawn to exclude this site. With regards to the identification of the site as bird habit, we have raised concerns in these representations regarding the robustness of the evidence underpinning this designation. Nonetheless, by improving the suitability of other sites in the area for bird use (i.e. Site 2 or 5) under the terms of the Council's Policy NE5, a policy compliant strategy to address the loss of the bird site to development is not unachievable. A strategy of improving habitat off-site is being taken in respect of the Oakcroft Lane site, which is also a low use site, and has the support of Natural England and the Council's ecologist.

#### **Site 2: Land West of Peak Lane**

This site is located to the north of the by-pass and extends across much of the gap towards the urban edge of Fareham in the north. Given its location and context, the development potential of this site is considered to be limited. However, the land could be an effective nitrate mitigation and/or bird protected habitat site that mitigation solution that could be used to address the potential impact development on other sites within Permission interests and/or other sites in the Borough the require mitigation solutions.

#### **Site 3: Land North of Titchfield Road**

This site is located to the north-west of Stubbington. Whilst this site formed part of the previous SGA, it is clearly distinct from and separate from it. This site is small scale that is well-contained in landscape terms, surrounded by existing built development and is deliverable in the short-term as stand-alone site that can be brought forward either as part of outside of the SGA masterplanning process should the Council seek to revisit this project. Initial capacity assessments of Site 3 indicates that it is capable of delivering around 40-50 new homes.

The SHELAA 2019 concluded that Site 3 (SHELAA Ref: 3190) was a deliverable housing site. However, in the SHELAA 2020 considers the site to be undeliverable due it being classified as a Low Use Brent Geese and Solent Waders site with no evidence of a strategy compliant solution. The Council ascribes a capacity of 20 dwellings to the site. It is unclear how the Council has reached these conclusions regarding the suitability of the site given its assessment of the site undertaken just nine months prior. With regards to the identification of the site as bird habit, we have raised concerns in these representations regarding the robustness of the evidence underpinning this designation. Nonetheless, by improving the suitability of other sites in the area for bird use (i.e. Site 2 or 5) under the terms of the Council's Policy NE5, a policy compliant strategy to address the loss of the site to development is not unachievable. This approach to improving habitat off-site is being taken in respect of the Oakcroft Lane site, which is also a low use site, and has the support of Natural England and the Council's ecologist.

#### **Site 4: Land South of Titchfield Road**

This small site is located to the north-west of Stubbington. It bounded to the north-east and north-west by existing housing fronting Titchfield Road and the Crofton Equestrian Centre. The site's relationship with the wider Meon Valley landscape is limited by the woodland to the south of the site. The woodland to the south and its associated watercourse (which is also within Dunley Estate ownership) is recognised as an important ecological resource. Sensitive site design, however, could provide a means of ensuring the ecological interests at this adjoining site are protected and enhanced. Initial site capacity assessment indicated that the site is capable of delivering between c. 10-30 new homes. Were the Council minded to allocate the site for residential development, it could provide an important contribution towards its small-medium site housing allowance as required by Paragraph 68 of the NPPF.

#### **Site 5: Land West of Cuckoo Lane**

This site adjoins the settlement boundary of Stubbington to its north-eastern boundary. It is characterised by a substantial arable field that is well-contained in the north by the built form of Stubbington and substantial woodland. Initial capacity testing of this site, which has allowed for a substantial ecological buffer to the woodland, strategic planting to contain the site from the wider Meon Valley, land for a new school and new parkland further south, indicates that it is capable of delivering around 150-200 new homes.

This site is assessed in the SHELAA as being undeliverable due to being located within a *'highly sensitive landscape (based on the Fareham Landscape Assessment) and within an Area of Special Landscape Quality. Significant ecological constraints associated with the adjacent SPA/SSSI affect the suitability of the site.'* The SHELAA ascribes a capacity of 240 dwellings to the site. Whilst the ecological and landscape challenges associated with this site are recognised, they are not insurmountable. Although not a consideration for the SHELAA per se, the site provides the opportunity to deliver substantial ecological and recreation benefits, alongside community benefits, including new education provision and allotments.

#### **Site 6: Land at Oakcroft Lane**

Similar to Sites 1 and 3, the Oakcroft Lane site can be delivered outside of or as part of the SGA process (should the Council revisit this project). However, as demonstrated through the planning application, the site is deliverable now as a standalone development site. Technical issues associated with the development have been resolved and Persimmon are currently awaiting determination of the application by the Council. The site is capable of delivering 209 new homes alongside a considerable area of space to the north of the housing and to the south of the by-pass for ecological purposes. The Site Plan is attached to these representations at Appendix 1.

The SHELAA 2019 concluded that Site 3 (SHELAA Ref: 3141) was a deliverable housing site. However, in the SHELAA 2020 the Council considers the site to be undeliverable due to the site to be undeliverable due to the site being classified as a Low Use Brent Geese and Solent Waders site with no evidence of a strategy compliant solution. The Council ascribes a capacity of 200 dwellings to the site. It is unclear how the Council has reached these conclusions given its assessment of the site undertaken just nine months prior, and considering the site-specific mitigation strategy for protected birds has the support of Natural England and the Council's ecologist via the planning application process.

## **Appendix 1: Oakcroft Lane Site Layout**





Rev	Date	Revision Details	Dr	Ch
E	22.04.20	Bypass junction amended	br	db
D	25.02.20	see planning cover note	br	db
C	05.11.19	see planning cover note	br	db
B	20.09.19	see planning cover note	br	db
A	22.07.19	see planning cover note dated 23 July	br	db

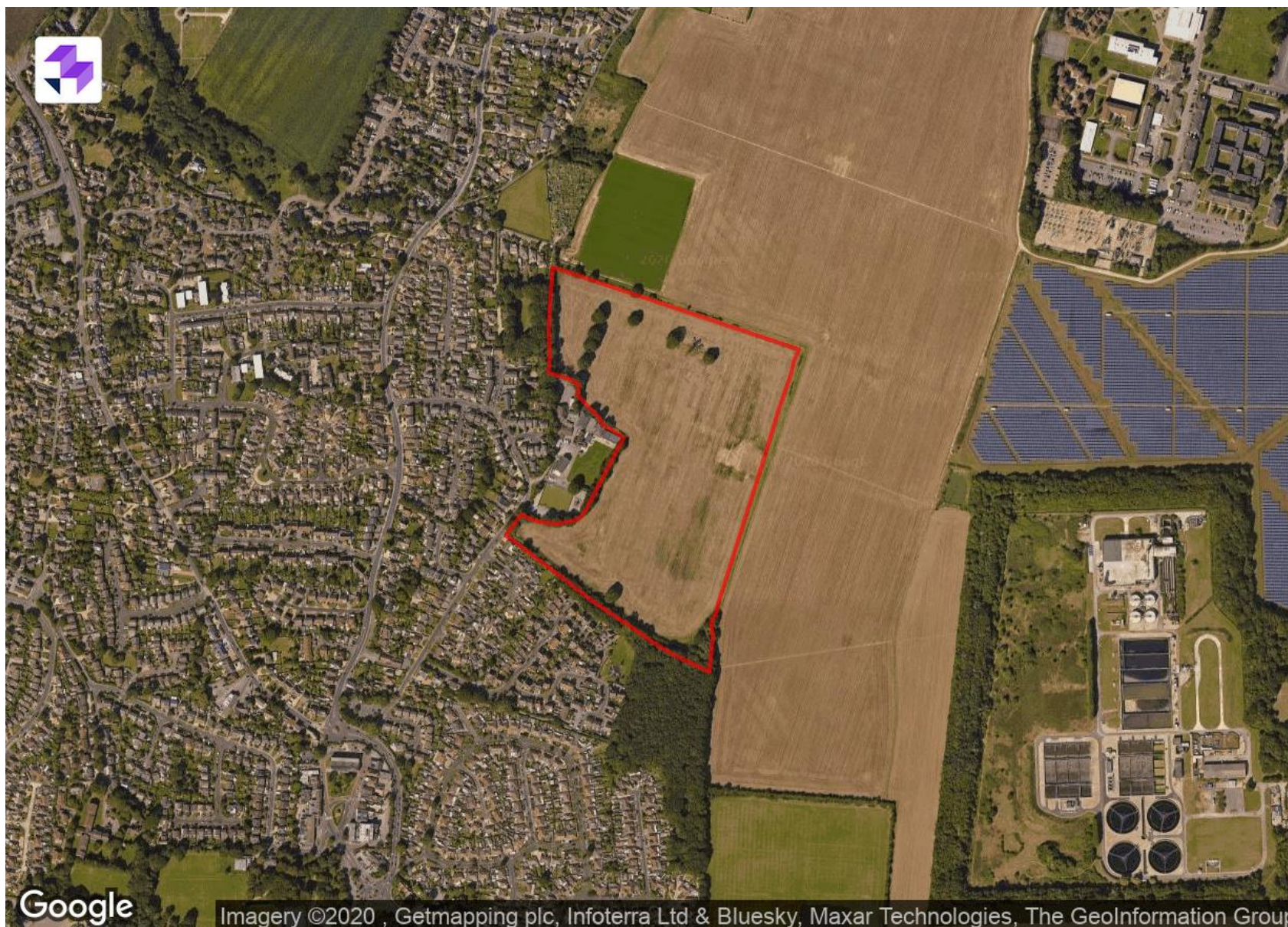


**PERSIMMON**  
Together, we make a home

Job Title Oakcroft Lane, Stubbington		
Drawing Title Site Layout		
Job No 220	Drawing No A-02-015-SL	Rev E
Drawn BR	Checked DB	Date March '19
Scale 1:1000 @ A1 / 1:2000 @ A3		
metres 20 40 60 80 100		
Status PLANNING		



## **Appendix 2 Omission Site Location Plans**



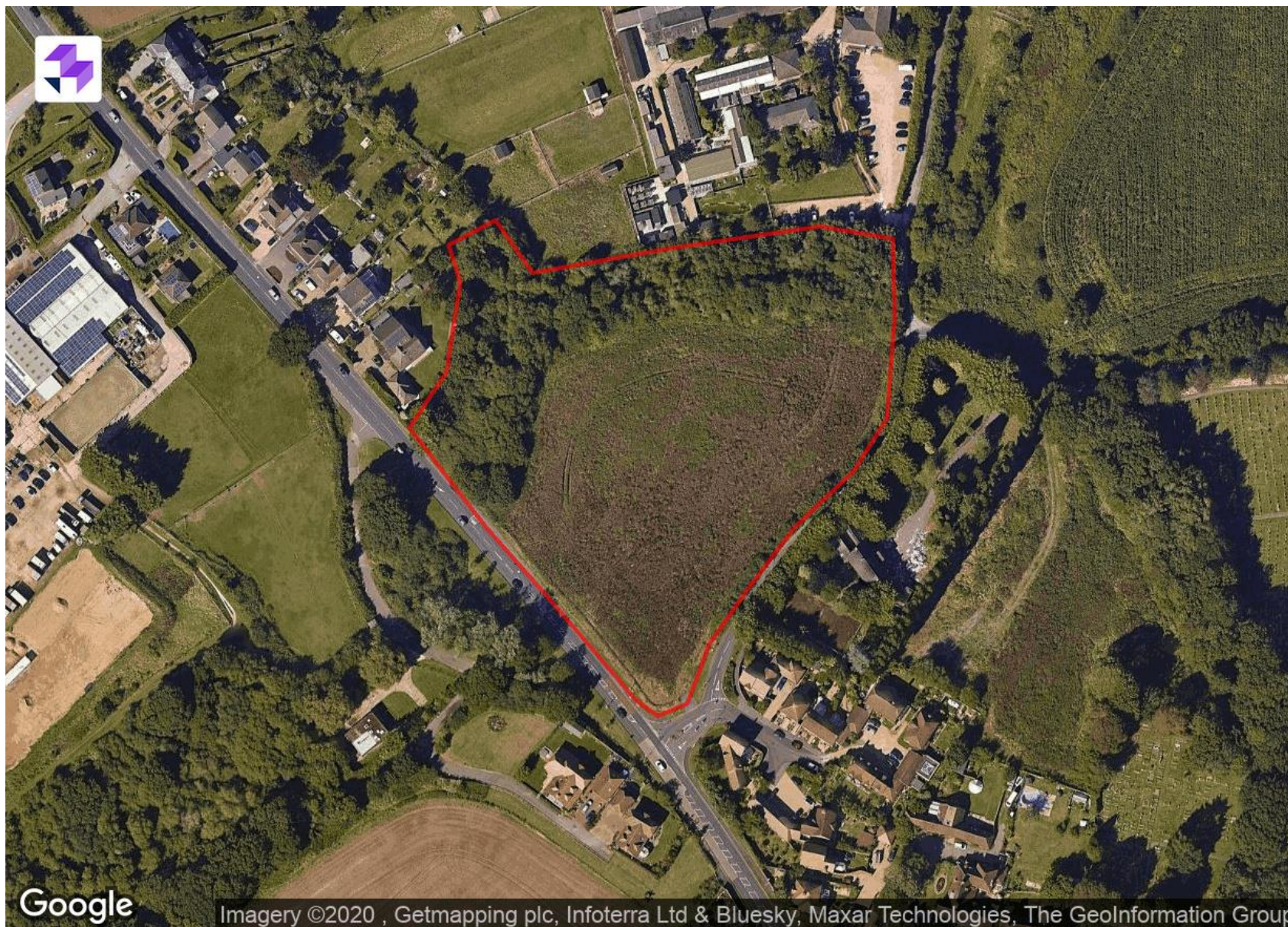
**Site 1 Location Plan: Burnt House Lane, Stubbington**





**Site 2 Location Plan: West of Peak Lane, Stubbington**





**Site 3 Location Plan: North of Titchfield Road, Stubbington**







**Site 4 Location Plan: South of Titchfield Road, Stubbington**





**Site 5 Location Plan: West of Cuckoo Lane, Stubbington**





A	22.07.19	see planning cover note dated 23 July	br	db
Rev	Date	Revision Details	Dr	Ch



**PERSIMMON**  
Together, we make a home

Job Title  
Oakcroft Lane, Stubbington

Drawing Title  
Site Layout

Job No	Drawing No	Rev
220	A-02-015-SL	A
Drawn	Checked	Date
BR	DB	March '19

Scale  
1:1000 @ A1 / 1:2000 @ A3  
metres 20 40 60 80 100

Status  
**PLANNING**



# 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:	Daniel
Last Name:	Ramirez
Job Title: (where relevant)	Strategic Planning Manager
Organisation: (where relevant)	Persimmon Homes (South Coast)
Address:	Parkview House, 100 Wickham Road, Fareham, Hampshire
Postcode:	PO17 7HT
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).

Please refer to representations statement

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

Please refer to representations statement

B1c Which part of the Policies Map?

Please refer to representations statement

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 representations statement

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 representations statement

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

Please refer to representations statement

B4c Your suggested revised wording of any policy or text:

Please refer to representations statement

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 elaborate on comments set out in the representations statement

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:** 10 December 2020 11:40  
**To:** Wootton, Gayle; Keely, Lauren; Younger, Emma  
**Subject:** FW: Consultation on the FBC Local Plan

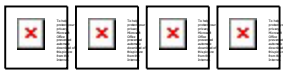
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear All

We have received this response from a Gosport Councillor. I will ask if he wants to be part of the examination hearing sessions and log his responses on the spreadsheet but as he is a councillor thought I'd make you aware.

Kind regards

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Philip Raffaelli [REDACTED]  
**Sent:** 08 December 2020 13:33  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** Consultation on the FBC Local Plan

Dear Sir/Madam

I wish to comment on the FBC Local Plan but the constrained format of the form makes that difficult so I have detailed my comments as below. I confirm I am commenting in my own right and am not acting as an Agent.

I was delighted to see the public announcements by the Leader of Fareham Borough Council that that the proposal to offer the Strategic Growth Areas (SGAs) as part of the new local plan will not now be taken forward and am pleased that that appears to have been reflected, to a degree, in the FBC Plan.

However, continuing to designate the SGAs as currently, I believe means there is still a risk of losing the Strategic Gaps in the future. This is especially concerning given the government's plan to give automatic planning permission in areas designated as Growth Areas if their proposed changes to the planning process are accepted. I can see nothing in this iteration of the FBC Plan that gives me the confidence that the SGAs no longer exist in some form or another.

I also note that Gosport Council continue to raise concerns about development in the Strategic Gap as indicated at paras 3.20 & 3.21 - I share that concern.

The main points in the Plan which I believe gives contradictory designation to Strategic Gap areas are at:

Appendix C-Sustainability Appraisal, Section 4.6, para 4.6.6 says "North of Downend and South of Fareham were taken forward as the subject of the Strategic Growth Area (SGA) policy in the Regulation 18 Supplement consultation document, setting out the Council's intention to work with landowners and site promoters in these

areas to develop a Council-led masterplan which will focus on delivery of community benefits as part of good growth"

Para 4.7.5 says "In addition, the South of Fareham SGA and the western portion of the North of Downend SGA are also not proposed for allocation. Site ID 3030 Downend Road East, which forms the eastern section of the North Downend SGA, is retained in the development strategy in place of the SGA in its entirety"

Section 5.3, para 5.3.1 says, "This assessment supported the selection of new site allocations and two SGAs to supplement the preferred development strategy identified at the Draft Plan stage. These eight areas are therefore considered reasonable alternatives to the Plan. A description of the eight areas is provided in Table 5.1"

Also of note are paras 5.3.4 and 5.3.5

Appendix G-Duty to Cooperate Statement, Section 3, para 3.13. "The Council advised WCC that it would be undertaking a further Landscape/Strategic Gap assessment as part of the evidence base."

Appendix G, Appendix 6- Homes England Teleconference Follow Up, the CCGs follow up letter on page 1505 and Appendix 9- Portsmouth City Council response to Regulation 18 consultation all mention the existence of the SGAs.

Appendix C, Section 14, Appendix G: Rationale for Site Selection or Rejection.

The following sites have been rejected for development:

1. 1040-Land East of Burnt House Lane, Stubbington
2. 3002-Land East of Newgate Lane South (A), Fareham
3. 3008-Land South of Longfield Avenue, Fareham
4. 3057-Land East of Newgate Lane, Fareham
5. 3075-Land at Bells Lane, Stubbington
6. 3098-Land West of Cuckoo Lane, Stubbington
7. 3129-Land West of Newgate Lane South, Stubbington
8. 3133-Newgate Lane South, Peel Common
9. 3153-Newlands Farm- Built Portion of Masterplan
10. 3198-Newlands Plus-Area A
11. 3199-Newlands Plus-Area B1
12. 3200-Newlands Plus Area B2
13. 3201-Newlands Plus-Area C


The reason given for refusal for the majority of those was because they lie within a strategic gap yet I can still find nothing that says the entire designation of SGA has been removed from those same Strategic Gaps.

In summary, I have a grave concern that unless the FBC Plan is clarified to formally remove those areas in the Strategic Gap from any suggestion that they lie within areas identified for Strategic Growth, then we will not be in a position to protect them from future development.

Yours Faithfully

Dr Philip Raffaelli CB FRCP  
Councillor for Anglesey Ward  
Gosport Borough Council

**Respondent details:**

Title:	Mrs
First Name:	Samantha
Last Name:	Pope CEng BEng (Hons)
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

**1) Policy: TIN2 - Highway Safety and Road Network**

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

**Please provide details you have to support your answers above**

10.15 Transport plan does not include an analysis of streets where the majority of the houses are proposed. Why hasn't more consideration been given to HA1 in the transport assessment? There are 830 dwellings proposed in HA1. With an average of 2 cars per dwelling, an additional 1660 vehicles will be on local roads! Because of the lack of consideration, there is no reference for the mitigation required to reduce congestion by 2036. The Plan fails the Test of Soundness by not being Positively Prepared in this respect. QUOTE 14.6 of Final transport Assessment "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." This statement doesn't include the area of the local plan with 800 homes isn't assessed within the document Transport plan. 10.27 All developers will provide monies under section 106 to contribute to the Infrastructure Delivery Plan (IDP) . However there is nothing identified within the IDP table as a required contribution to transport and travel or highways in the western wards.

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

There is no reference for the mitigation required to reduce congestion by 2036. The Plan fails the Test of Soundness by not being Positively Prepared in this respect. This statement doesn't include the area of the local plan with 800 homes isn't assessed within the document Transport plan. 10.27 All developers will provide monies under section 106 to contribute to the Infrastructure Delivery Plan (IDP) . However there is nothing identified within the IDP table as a required contribution to transport and travel or highways in the western wards.

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

Complete a transport assessment and include this along with mitigations required to the area of HA1. Include the mitigation within the IDP and itemize the contributions for travel and highways in the western wards

**Your suggested revised wording of any policy or text:**

The statements and supporting documentation must include the 800 homes proposed in HA1. I can not suggest wording for this as the professionals (transport, highways and infrastructure engineers) should complete the calculations required for HA1 and provide mitigation measures as a result.



**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: 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**

From the Infrastructure Delivery Plan Section 5.4 Education is planned by Hampshire County Council. However the period of the child placements to extent the local schools only covers up to 2021. Has the council fully engaged with HCC over the houses planned for Warsash and the Western Wards as they will be built over the next five years and the local plan extends up to 2036. Is this a sound approach for the borough and our children's education? The IDP table item 83 Calls for section 106 provisions of additional Early Years Foundation Provision (EYP) within the Western Wards, however HA1 does not show the placement of a nursery or pre-school within the developments area. Where is this contribution of child placement to be allocated as the IDP calls for the addition of 83No placements when there are over 1000 dwellings added to the area. The IDP calls for the expansion for health care in the Western Wards with additional of GP locations in the Western Wards, however within the table provided within the document the timeline of this project and its review is in the past (prior to adoption of the local plan). How is this a sound approach for the borough when addition of 830 dwellings in HA1 alone.

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

From the IDP Section 5.4 Education is planned by Hampshire County Council. However the period of the child placements to extent the local schools only covers up to 2021. Has the council fully engaged with HCC over the houses planned for Warsash and the Western Wards as they will be built over the next five years and the local plan extends up to 2036. Is this a sound approach for the borough and our children's education? Extend the schools study to include the duration of the draft plan, or the next five years identified with the majority of growth in the area, especially HA1 The IDP table item 83 Calls for section 106 provisions of additional Early Years Foundation Provision (EYP) within the Western Wards, however HA1 does not show the placement of a nursery or pre-school within the developments area. Where is this contribution of child placement to be allocated as the IDP calls for the addition of 83No placements when there are over 1000 dwellings added to the area. Assign EYP within the area of HA1 with contributions made by each of the developers to ensure the IDP is met for the western wards. The IDP calls for the expansion for health care in the Western Wards with additional of GP locations in the Western Wards, however within the table provided within the document the timeline of this project and its review is in the past (prior to adoption of the local plan). How is this a sound approach for the borough when addition of 830 dwellings in HA1 alone. Complete the review inline with the timeframe set out in this local plan.

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

Complete the studies identified in the supporting documentation to ensure the local plan is sound for the provision of education, early years foundation provision and GP surgeries.

### **Your suggested revised wording of any policy or text:**

I can not make a suggestion for wording changes as i am not a professional in these fields. Once the studies have completed the mitigation should be included within 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: 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**

7.13 Local retail/commercial facilities figures do not cater for the additional houses in Warsash. For example, No convenience goods floor space has been allocated to Warsash

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

Include convenience goods floor space in Warsash to account for the number of proposed houses in HA1.

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

Include a retail figure for the western wards.

**Your suggested revised wording of any policy or text:**

I can not calculate the retail figure for the western wards as i am not a professional in this field. Have the supporting documentation updated and add the figures to 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

#### 4) Policy: D1 - High Quality Design and Placemaking

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

**Please provide details you have to support your answers above**

11.34 The council will support applications where development exceeds Building Regulations however no target has been set, is this 1% better or 10 % . The local plan is therefore is not sound and effective approach to carbon emissions as a borough. 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 carbon reductions promised by the government. The council therefore should set standards much like the London boroughs to ensure developers are designing for sustainable homes. These boroughs are also using new standards of design calculations (SAP10) which are not yet within building regulations which must be adhered too. The Fareham Design guidance do not give any guidance on sustainability.

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

11.35 The council will support applications where development exceeds Building Regulations however no target has been set, is this 1% better or 10 % . The local plan is therefore is not sound and effective approach to carbon emissions as a borough. 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 carbon reductions promised by the government. The council therefore should set standards much like the London boroughs to ensure developers are designing for sustainable homes. These boroughs are also using new standards of design calculations (SAP10) which are not yet within building regulations which must be adhered too. The Fareham Design guidance do not give any guidance on sustainability, this should be updated to include potential green technologies that the council would accept as part of a planning proposal.

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

The energy strategy provided as supporting documentation only accounts for the Borough. The councils design guidance standard should include an ideal energy strategy that the developers can adopt and modify as part of their planning submission.

**Your suggested revised wording of any policy or text:**

11.35 The council require the developer to submit plans to see each dwelling be designed to achieve an energy efficiency 20% better than building regulations Part L1A 2013. Update the Fareham design guidance to include sustainable housing design.

**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 a professional engineer in this field I will be able to provide further insight and evidence on this subject.

---

**5) Policy: CC4 - Renewable and Low Carbon Energy**

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

**Please provide details you have to support your answers above**

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 power generation within the borough and not what each of the development sites should deliver over and above Building Regulations requirements, on this basis it is believed that the plan is not positively prepared

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

Include targets for the next five, ten and fifteen year periods to ensure the developers have each follow the same targets and guidelines

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

Include targets for the next five, ten and fifteen year periods to ensure the developers have each follow the same targets and guidelines. Targets should follow national standards to meet the climate change protocols

**Your suggested revised wording of any policy or text:**

i can not suggest wording on this.

**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: 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 government have had a strategic rethink on how housing numbers are allocated to each area of the UK and issued within the timeframe of these comments. The Fareham local plan has used a now defuncted algorithm used to calculate the number of houses proposed within the area. The 800 plus homes allocated to the western wards should be recalculated using the new formula to ensure the western wards isn't saturated with new homes where it isn't required to meet government targets.

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

To ensure the plan is sound and compliant with government requirements. the number of homes required within Fareham should be recalculated. Particular attention should be made to the western wards to ensure it is not saturated with houses and that Fareham as a whole borough is developed according to the latest formula.

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

New housing figures mapped on to HA1 in particular.

**Your suggested revised wording of any policy or text:**

i can not comment without completing the new calculations

**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

---

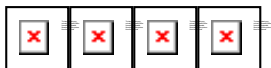
**Keely, Lauren**

---

**From:** Wootton, Gayle  
**Sent:** 18 December 2020 17:38  
**To:** Planning Policy  
**Subject:** Portsmouth City Council response  
**Attachments:** PCC\_Fareham\_reg19 \_dec20.pdf

**Importance:** High

Gayle Wootton  
Head of Planning Strategy and Economic Development  
Fareham Borough Council  
01329824328



---

**From:** Cutler, Rachel <Rachel.Cutler@portsmouthcc.gov.uk>  
**Sent:** 18 December 2020 15:54  
**To:** Wootton, Gayle <GWootton@Fareham.Gov.UK>  
**Subject:** Fareham Local Plan Regulation 19 Consultation  
**Importance:** High

Hi Gayle,

Hope you're well. Attached are Portsmouth City Council's draft representation on the Fareham Local Plan. Are you happy to accept these comments as draft at this time pending comment from our Portfolio holder?

Have a lovely Christmas break.

Kind regards

**Rachel Cutler** | Head of Planning Policy  
Planning Policy, Planning & Economic Growth | Regeneration Directorate |



---

This email is for the intended recipient(s) only.

If you have received this email due to an error in addressing, transmission or for any other reason, please reply to it and let the author know. If you are not the intended recipient, you must not use, disclose, distribute, copy or print it.

This email may be monitored, read, recorded and/or kept by Portsmouth City Council. Email monitoring and blocking software may be used.

---



Gayle Wotton,  
Planning Strategy Manager  
Civic Offices,  
Civic Way,  
Fareham,  
PO16 7AZ

**Planning Policy,  
Planning and Economic  
Development**

Portsmouth City Council  
Civic Offices  
Guildhall Square

Phone: [REDACTED]

Ref:

17 December 2020

Dear Gayle,

**Re: Fareham Borough Council - Local Plan 2037: Portsmouth City Council response**

Thank you for consulting Portsmouth City Council on the emerging Fareham Local Plan. The City Council would like to make the following comments:

**Approach to Housing Need**

1. While the Fareham Borough Council's (FBC) 'Regulation 19' Publication Plan has been out to consultation the Government has announced a revised standard methodology for assessing local housing need, following the *Changes to the current planning system* consultation published in August 2020. For both Fareham and Portsmouth this results in the previous standard method numbers being retained (514 and 855 per annum respectively<sup>1</sup>) rather than the proposed lower figures put forward for consultation by Government in August (estimated to be 403 and 730 per annum respectively). The development strategy proposed by the Reg 19 version of the Fareham Borough Council Local Plan 2037 is based on the 420 per annum figure.
2. Portsmouth has a finite capacity to accommodate new development due to its geographical constraints; changes to Portsmouth's housing target are therefore directly reflected in the cities unmet housing need. Paragraph 4.5 of the FBC's Publication Plan references the City Council's formal request for Fareham to accommodate 1,000 dwellings of Portsmouth's unmet need; Fareham's contribution in its housing supply for the plan period of 847 dwellings to the unmet need of all neighbouring authorities' is noted and welcomed. However, under the December 2020 methodology, the City Council has a total unmet need of over 3,000 dwellings. The City Council would therefore wish to maintain the request to FBC to potentially accommodate up to 1000 dwellings as a portion of Portsmouth's unmet need. The City Council is also conducting other Duty to Cooperate discussions on the matter

<sup>1</sup> MHCLG *Indicative local housing need* (December 2020 revised methodology) available from:  
<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

with neighbouring authorities in the Portsmouth Housing Market Area. Gosport and Havant Borough Councils have both indicated capacity limitations. However, the City Council recognise that the distribution of housing need is broader than the PCC and FBC authority areas, and will require consideration and co-operation at the sub regional scale.

3. In response to FBC's previous Local Plan consultation (Local Plan Supplement, March 2020), the City Council welcomed the proposal for two Strategic Growth areas (North of Downend, and South of Fareham) in Fareham Borough's Local Plan, which were indicated at that time as having the potential to meet unmet development needs from the Borough's neighbouring authorities. The City Council indicated that North of Downend would be particularly suitable for accommodating unmet need from Portsmouth given its closer geographical proximity to the city and transport links via the M27/ A27, Portchester railway station and the proposed Bus Rapid Transit (BRT) line.
4. The Publication Plan has not taken the two Strategic Growth Areas forward, due to the anticipated reduction in FBC's housing target from Government. Given the potential revision in housing need targets (published 16.12.20), this would justify FBC's reconsideration of the inclusion of such sites to help meet FBC's housing need and well as unmet need from other neighbouring authorities in the Portsmouth Housing Market Area, including PCC.
5. PCC and FBC will continue to work collaboratively to address strategic planning matters, both through the Partnership for South Hampshire (PfSH) and, where necessary, on a bilateral basis. The PfSH authorities' are currently undertaking a piece of work (as part of the review of the 2016 Spatial Strategy) to identify sufficient suitable sites to accommodate unmet housing need across the sub region, with specific focus on Housing Market Areas. This will include ensuring there are sufficient sites in the Portsmouth Housing Market Area (which contains both Portsmouth and a large part of Fareham). The City Council welcome the inclusion of land at Down End and development in part of the Stubbington Gap in the PfSH Strategic Development Opportunity Area work as part of the range of strategic site options being considered. The City Council supports the specific reference to the on-going joint work with the PfSH authorities in paragraph 1.3 of the Plan.

## **Employment**

6. In regard to employment, Portsmouth and Fareham's authority areas' form part of a wider market area, with commuters moving between the city and the surrounding towns including Fareham and the M27 corridor. PCC supports the allocations for employment land in Policy E1: Employment Land Provision, particularly the sites at Daedalus which of sub-regional importance to the local market.
7. The City Council would encourage HBC to consider how the Local Plan could help to resist the loss of employment space (e.g. a future Article 4 Direction), as well as the loss of other allocated uses that fall under Use Class E where necessary. If allocated employment land is lost to residential uses this could lead to an increase in unsustainable travel patterns and greater pressure on the wider area. We would welcome further discussion with FBC, and other Councils in Portsmouth Housing Market area and/ or PfSH area, on this matter to establish a common approach.

## Portsdown Hill

8. Portsdown Hill is an important part of the landscape in South East Hampshire, for its open space, landscape and heritage value as well as the views of and from the hill. The City Council supports the identification of Portsdown Hill as an Area of Special Landscape Quality under the FBC Publication Plan Policy DS3, and notes the evidence produced to support the allocation in the *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* (Sept 2020).
9. The City council would welcome any further opportunities for joint working on the strategic approach to Portsdown Hill, together with Winchester District Council and Havant Borough Council, including as a consultee on development proposals.

## Environment

10. The City Council welcomes the inclusion of NE1 - Protection of Nature Conservation, Biodiversity and the Local Ecological Network, Policy NE6: Trees, Woodland and Hedgerows, Policy NE9: Green Infrastructure which together help protect key species and habitats and promote green space coverage within south Hampshire.
11. Portsmouth are currently developing a green infrastructure network for the city, including the identification of a number of existing and proposed 'green corridors' to link up open spaces across Portsmouth, encourage active travel, enhance biodiversity and support resilience to climate change. A first draft of the proposed network was published in PCC's Green Infrastructure Background paper in February 2019; it includes the identification of several potential 'green corridors' that would meet the boundary with Fareham's authority area: Portsdown Hill Road and Southampton Road (A27). The City Council would welcome any discussion on how these proposed corridors could be extended beyond the City Council area, and/ or support for these linkages in the FBC Local Plan if possible. The identified ecological network opportunities (shown the map in Appendix C of the Publication Plan) along Portsdown Hill Road and the A27 within the FBC authority area are noted.
12. The City Council is committed to continuing to work with FBC and the other members of the PfSH Water Quality Working Group as necessary on short, medium and long term 'nutrient neutral' mitigation solutions for housing development within the Solent catchment. Current discussions indicate that mitigation solutions are likely include the identification and securing of suitable off-setting land in the Solent catchment, predominately outside the Portsmouth urban area.
13. The City Council is also mindful of the likely forthcoming requirement to provide at least 10% biodiversity net gain on development sites, as part of the anticipated Environment Act. While the City Council is currently undertaking further work to explore how such requirements could be effectively applied within an urban environment and to identify off-site opportunities for biodiversity creation and/ or enhancement within the city, there is the potential for a shortfall in net gain provisions (subject to the final provisions of the Environment Act) within the plan period. Securing land for nitrate mitigation presents one such opportunity to seek multiple environment benefits for the sub region (biodiversity net gains, carbon off-setting, Suitable Alternative Greenspaces (SANGs) for recreational disturbance,

habitat compensation of coastal defence schemes etc). The City Council are committed to furthering these discussions with Fareham BC and the other PfSH authorities on this matter, and to consider the potential for environmental off-setting on both a sub-regional and a site by site basis as appropriate.

## **Education**

14. The City Council continues to maintain close links with Hampshire County Council as Education Authority due to cross border pupil movement. Development in close proximity to the FBC and PCC authority borders can impact the availability of school places across authorities. The timing and size of development should therefore be closely monitored to ensure the continued availability of school places during the life of both Local Plans.

## **Transport**

15. The City Council welcomes the reference in paragraph 10.3 of support for proposals that promote sustainable transport links through Fareham Borough to Portsmouth and Southampton. The city also supports the reference to the development of the rapid transit networks between the two authorities and linking to others in the sub region in paragraph 10.20.

If you wish to discuss any of the matters raised in our response, please do not hesitate to contact me.

Kind regards,

**Rachel Cutler**

**Acting Planning Policy Manager**

Email: [REDACTED]

**Keely, Lauren**

---

**From:** Catchment\_Management [REDACTED]  
**Sent:** 14 December 2020 16:19  
**To:** Planning Policy  
**Subject:** FW: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)  
**Attachments:** Fareham Borough Council Local Plan\_Local Plan Consultation (6th Nov – 18th Dec) PW Consultation.pdf

Dear Recipient,

Thank you for consulting Portsmouth Water on your Local Plan Consultation. Please see attached our formal consultation response.

Many thanks.

Kind regards,

Beth Fairley

*Catchment Management Team  
Portsmouth Water*



---

**From:** Planning Policy <PlanningPolicy@fareham.gov.uk>  
**Sent:** 06 November 2020 15:47  
**Subject:** [EXTERNAL] Regulation 19 Local Plan Consultation (6th November – 18th December 2020)  
Dear Sir or Madam,

### **Regulation 19 Local Plan Consultation (6<sup>th</sup> November – 18<sup>th</sup> 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<sup>[1]</sup> 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](mailto: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:

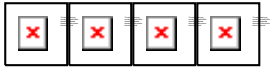
- Submission of the Fareham Local Plan to the Secretary of State for examination
- Publication of the recommendations of the person appointed to carry out the independent examination of the Fareham Local Plan on behalf of the Secretary of State
- Adoption of the new Fareham Local Plan

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



---

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.



### RoSPA 2020 Order of Distinction Winner

This e-mail is intended only for the addressee named above. As this e-mail may contain confidential or privileged information if you are not, or suspect that you are not, the named addressee or the person responsible for delivering the message to the named addressee, please telephone us immediately. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices. Please note that we cannot guarantee that this message or any attachment is virus free or has not been intercepted and amended. The views of the author may not necessarily reflect those of the Company.

Registered Office: Portsmouth Water Ltd, P.O. BOX NO.8, West Street, Havant, Hampshire. PO91LG. Telephone (02392)499888. Fax (02392) 453632. Registered in England No 2536455. VAT No. GB 615375835.

---

<sup>[1]</sup> <https://www.legislation.gov.uk/uksi/2020/731/introduction/made>



**Registered Office:**  
Portsmouth Water Ltd  
PO Box 8  
Havant  
Hampshire PO9 1LG

Tel: 023 9249 9888  
Fax: 023 9245 3632  
Web: [www.portsmouthwater.co.uk](http://www.portsmouthwater.co.uk)

## Fareham Borough Council Local Plan Review Consultation (6th November – 18th December 2020)

Portsmouth Water have reviewed the new Local Plan 2037. In our previous representations on the Draft Local Plan we recommended several policy recommendations specifically regarding the protection of water quality of drinking water resources. In addition, we expressed our position on the specific topics related to water resource protection e.g. water efficiency.

### **Policy D4: Water Quality and Resources**

Portsmouth Water are very supportive of this policy and pleased to see this addition to the new Local Plan. We are satisfied with this policy and the inclusion of 'Source Protection Zones'.

Furthermore, we are pleased to see that the council is actively encouraging new developments to have a maximum water usage of 110 litres per person per day and highlighted those who meet the higher technical standard of 100 litres per person per day will be supported. This is in line with water industry's aspirations of 100 litres/head/day by 2050 to improve environmental protection, reduce wastewater discharge.

### **Strategic growth areas & Site options**

There are eight proposed strategic growth areas in the plan to meet future demands for housing beyond 2036. Two of the proposed strategic growth areas (Land around Welborne Garden Village and Land West of Porchester) fall within a Groundwater Source Protection Zone (SPZ). Any development proposals within these areas that fall within the Groundwater Source Protection Zone (SPZ) will need to take into consideration the high sensitivity of the groundwater environment in line with design policy D4. There will be certain constraints and measures that will to be implemented to protect groundwater quality. Further guidance on

Portsmouth Water's preferred approach to development relating to groundwater quality within groundwater catchments (SPZs) can be found within Portsmouth Water's Groundwater Protection Guidance notes available to view on our website <https://www.portsmouthwater.co.uk/developers/groundwater-protection/>

Catchment Management Team

Portsmouth Water

[catchment.management@portsmouthwater.co.uk](mailto:catchment.management@portsmouthwater.co.uk)

---

**Respondent details:**

Title:	Mr
First Name:	Russell
Last Name:	Prince-Wright
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

---

**1) Paragraph: 1.16**

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

**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

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

Only refer to the adopted 2015 Local Plan and not the 2017 plan which was abandoned and should not be used for evidence or allocations

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

By using the 2015 Adopted Plan the Council could rely on approved facts and not draft information which is not legally compliant or sound

**Your suggested revised wording of any policy or text:**

The policy will need to refer to the 2015 Adopted Plan only and then throughout the Plan, the facts and evidence should refer to this rather than information from the unadopted 2017 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

---

**2) Paragraph: 4.8**



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

**Please provide details you have to support your answers above**

LPA can 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.

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

Remove the errant mentions of Allocated Sites (taken from the UnAdopted 2017 Plan) and use only sites from the Extant 2016 Local Plan

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

It would utilise the correct, Adopted Local Plan and not a draft plan (2017) which was abandoned and never adopted

**Your suggested revised wording of any policy or text:**

Removal of references to any site allocations which were not mentioned in the extant (2015) 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: 4.19

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

**Please provide details you have to support your answers above**

Housing policies HA(2,5,6,8,11,14,16,18,20,21,25) are no longer proposed allocations. So, why has HA1 been singled out as an allocation and where is the Evidence for the Objectively Assessed Housing Need in the local area to support this site allocation?

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

Add HA1 to the list of excluded Site Allocations (that were consulted on for the Draft Local Plan 2017 but never proposed)

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

It would rely on valid Allocation information from the extant Plan rather than on the abandoned 2017 draft Plan

**Your suggested revised wording of any policy or text:**


Insert "HA1" before "HA2"

**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:	Read
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

---

**Respondent details:**

Title:	Mrs
First Name:	Lois
Last Name:	Read
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**

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

**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:	Melvyn
Last Name:	Rees
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	Yes
Sound	No
Complies with the duty to co-operate	Yes

**Please provide details you have to support your answers above**

I question the overall Soundness of the Proposed Local Plan In a number of areas of proposed housing allocation, there is no evidence of why a particular area has been included. Or in some cases excluded from the previous draft plan. Examples of this are HA4 Land to the East of Downend Road. This proposed allocation has been rejected 3 times, twice by the Fareham Planning Committee and once by the Government Planning Inspector, the grounds for refusal were Pedestrian Safety and Traffic Congestion. Yet like a bad penny up it comes again into the Local Plan, as though someone (the Planning Officers ?) have an obsession about including this site. Where is the Soundness in the Plan for calling up a 3x rejected site. No evidence or explanation given of what makes this Sound. Similarly, the proposed development to the Newlands Farm South of Longfield Avenue site has been removed. Again no explanation or evidence of why. This site has good road infrastructure to north, east, south and west, bus services, cycle ways, and in no way impinges on the Fareham/ Stubbington / Meon Strategic gap, as this gap will be cut in two by the Stubbington by-pass. Yet this site has been removed. Where is the Soundness of this decision. Again No evidence to support this decision. Again maybe based on the views of a Councillor or the Planning Officers, but their views without evidence does not make this a Sound Decision

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

Show evidence of why sites are included

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

Transparency. Show reasons why sites are included or removed. Without transparency and evidence it appears hard to understand the justification.

**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:	Tobin
Last Name:	Rickets
Organisation: (where relevant)	O

**Agent details:**

Title:	Mrs
First Name:	Pippa
Last Name:	Cheetham
Job Title: (where relevant)	Planning Director
Organisation: (where relevant)	Varsity Town Planning
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

---

**1) Policy: DS1 - Development in the Countryside**

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

## **Please provide details you have to support your answers above**

O&H's land lies predominantly to the south of Hook Park Road and immediately to the east of the settlement identified as an Urban Area on FBC's Development Strategy drawing. It is simply identified as Countryside. O&H's development concept for the land south of Hook Park Road is to bring forward a landscape-led scheme which identifies a series of self-build plots interconnected by an enhanced green infrastructure network. This would effectively extend the existing Urban Area eastwards and create an opportunity to strengthen the landscape structure in this area. The scale of development would be circa 50 dwellings, making a modest contribution to FBC's housing land supply over the plan period. This would also have the effect of continuing the sparse pattern of development that characterises the Hook Valley. Design controls could be employed that would ensure that the built development comes forward within a set of parameters. These would ensure that excellent design criteria are met but would draw on locally distinctive characteristics. There would also be an opportunity through the design control to demand the highest environmental standards. The reason for seeking its inclusion in the Local Plan is so that the site can be comprehensively planned and ensure that sustainability benefits are delivered for both the new and existing community. FBC's approach to delivering self-build housing in the Local Plan is inflexible and will not meet market demand for this type of tenure. The proposed policy limits self-build opportunities to predominantly being delivered via a percentage target on larger sites. As master developer, O&H have delivered many complex, large-scale sustainable urban extensions and, in their experience, the delivery of self-build dwelling on these sites is neither a reliable source of supply nor what the self-build market is seeking. Paragraph 61 of the NPPF states, "...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)." The footnote that supports this paragraph states, "Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand." It is suggested that the demand for self-build housing will not be met by supplying land in urban areas and on sustainable urban extensions. Part of the attraction of self-build is the opportunity to test the boundaries of innovative and exceptional design and to do so in small clusters on larger plots than would be made available on strategic sites. In order to meet a variety of self-build demand, it is contended that flexibility should be built into policies DS1, DS3 and HP9. The Council would be able to ensure that unsustainable development was resisted by invoking other Local Plan policies.

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

The addition of a criterion to Policy DS1 and the inclusion of Policy HP9 under criterion e (new criterion 'f').

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

Flexibility in where self-build housing can be located will meet the requirements of paragraph 61 of the NPPF and the requirements of the Self Build and Custom Housebuilding Act 2015.

## **Your suggested revised wording of any policy or text:**

Strategic Policy DS1: Development in the Countryside. 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: a) Is for development associated with an existing lawful dwelling, or b) Is proposed on previously developed land and appropriate for the proposed use, or c) Is for self-build housing of high design quality, or d) Is for retail, community and leisure facilities, tourism or specialist housing where it can be demonstrated that there is a local need for the facility that cannot be met by existing facilities elsewhere; or e) Is for a new or replacement building, conversion and/or extension within an existing educational facility (as identified on the Policies map) and would 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 or, f) Is for housing development compliant with one of the following policies: HP1, HP2, HP4, HP5, HP6, HP9 or HP11, or g) Is for employment development compliant with one of the following policies: E1 or E5, or h) Is for a new small-scale employment development to convert or extend an existing building, or replace a redundant or derelict structure, or i) Provides infrastructure that meets an overriding public need. In addition, proposals will need to demonstrate that they; i. Require a location outside of the urban area, and ii. Conserve and enhance landscapes, sites of biodiversity or geological value and soils, and iii. Recognise the intrinsic character and beauty of the countryside and, if relevant, do not significantly affect the integrity of a Strategic Gap, and iv. Maintain the character of the undeveloped coast, and v. Are not on Best and Most Versatile agricultural 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):**

The landowner has experience of delivering land for self-build housing in other parts of the country and would be able to offer an insight into market demand and the difficulties surrounding the reliance of delivering self-building housing on strategic sites or sustainable urban extensions.

---

## 2) Policy: DS3 – Landscape

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 considered that the Landscape Sensitivity Assessment goes too far in dictating where future development can and cannot be located. The Council's reliance on the findings of this Assessment to restrict the location of development does not allow for a scenario where development brings with it landscape benefits and enhancements. The Landscape Sensitivity Assessment has not been independently scrutinised and should not be relied upon as a development management tool.

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

Remove footnote 12 from Policy DS3.

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

Policy DS3 provides adequate protection for Areas of Special Landscape Quality. The draft policy introduces a location specific development management tool which has not been independently tested but is given absolute autonomy in dictating what is and what is not a suitable and sustainable location for development.

**Your suggested revised wording of any policy or text:**

Areas of Special Landscape Quality have been identified in the Borough and are shown on the Policies map. Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced. Development in the countryside shall recognise the intrinsic character and beauty of the countryside, paying particular regard to: a) Intrinsic landscape character, quality and important features; b) Visual setting, including to/from key views; c) The landscape as a setting for settlements, including important views to, across, within and out of settlements; d) The landscape's role as part of the existing Local Ecological network; e) The local character and setting of buildings and settlements, including their historic significance; f) Natural landscape features, such as trees, ancient woodland, hedgerows, water features and their function as ecological networks; and g) The character of the Borough's rivers and coastline, which should be safeguarded. Major development proposals must include a comprehensive landscaping mitigation and enhancement scheme to ensure that the development is able to successfully integrate with the landscape and surroundings. The landscaping scheme shall be proportionate to the scale and nature of the development. proposed.

**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 landowner would wish their landscape consultant to participate at any Hearing on this matter.

---

## 3) Policy: HP9 - Self and Custom Build Homes

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

### Please provide details you have to support your answers above

O&H's land lies predominantly to the south of Hook Park Road and immediately to the east of the settlement identified as an Urban Area on FBC's Development Strategy drawing. It is simply identified as Countryside. O&H's development concept for the land south of Hook Park Road is to bring forward a landscape-led scheme which identifies a series of self-build plots interconnected by an enhanced green infrastructure network. This would effectively extend the existing Urban Area eastwards and create an opportunity to strengthen the landscape structure in this area. The scale of development would be circa 50 dwellings, making a modest contribution to FBC's housing land supply over the plan period. This would also have the effect of continuing the sparse pattern of development that characterises the Hook Valley. Design controls could be employed that would ensure that the built development comes forward within a set of parameters. These would ensure that excellent design criteria are met but would draw on locally distinctive characteristics. There would also be an opportunity through the design control to demand the highest environmental standards. The reason for seeking its inclusion in the Local Plan is so that the site can be comprehensively planned and ensure that sustainability benefits are delivered for both the new and existing community. FBC's approach to delivering self-build housing in the Local Plan is inflexible and will not meet market demand for this type of tenure. The proposed policy limits self-build opportunities to predominantly being delivered via a percentage target on larger sites. As master developer, O&H have delivered many complex, large-scale sustainable urban extensions and, in their experience, the delivery of self-build dwelling on these sites is neither a reliable source of supply nor what the self-build market is seeking. Paragraph 61 of the NPPF states, "...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)." The footnote that supports this paragraph states, "Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand." It is suggested that the demand for self-build housing will not be met by supplying land in urban areas and on sustainable urban extensions. Part of the attraction of self-build is the opportunity to test the boundaries of innovative and exceptional design and to do so in small clusters on larger plots than would be made available on strategic sites. In order to meet a variety of self-build demand, it is contended that flexibility should be built into policies DS1, DS3 and HP9. The Council would be able to ensure that unsustainable development was resisted by invoking other Local Plan policies.

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

An additional sentence should be added to the first paragraph of Policy HP9.

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

The Local Plan would then be providing sufficient flexibility to meet the requirements of policy 61 of the NPPF and the Self Build and Custom Housebuilding Act 2015.

### Your suggested revised wording of any policy or text:

Policy HP9: Self and Custom Build Homes Proposals that provide for self and/or custom build homes within the Urban Area boundary, as defined on the policies map, will be supported in principle. Outside of the Urban Area boundary, proposals for self-build homes of high design quality will be supported in principle where they can demonstrate enhancement of the local landscape. On sites of 40 dwellings or more (gross), 10% of the overall dwellings shall be provided through the provision of plots for sale to address local self or custom build need. Such provision shall: a) be provided as serviced plots; and b) ideally be provided in grouped plots; and c) ensure design parameters are in place to provide a framework that takes account of the existing and emerging built form; and d) ensure design parameters are in place that ensure no significant detrimental impact on the amenity of existing, and potential neighbouring, self or custom build plots arises. Plots which are marketed appropriately but not sold within 12 months of initial promotion, may be developed for housing other than as self and/or custom build homes. Sites that appear to have been subdivided for the purposes of application submission so as to avoid the 40 dwelling threshold, or sites that feature as part of cluster of adjoining development sites, shall be considered cumulatively and if progressed on an individual basis 10% of dwellings shall be provided in accordance with this policy. Where a site's size and density make it unsuitable for self/custom build provision, exemption from the policy will be considered on an individual basis. For example, flatted development or specialist/older person accommodation.

**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 landowner has extensive experience in delivering land for self-build housing across other parts of the country and could offer insight into problems associated with over-reliance on strategic sites for delivering this tenure of housing.

---



**Respondent details:**

Title:	Mrs
First Name:	Barbara
Last Name:	Trimmings
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 Limited
Address:	<div></div>
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	Yes
Complies with the duty to co-operate	Yes

**Please provide details you have to support your answers above**

The land the subject of Allocation HA40 is bounded by Northfield Park to the east, the Garden of Rest to the south and Down End Farm to the west. Notwithstanding the dismissed appeal re P/18/0005/OA, the allocation of Down End Farm for housing development has been re-affirmed. The Agricultural Land Assessment undertaken by Geo-Environmental asserted that this site is Grade 3b ie it is not 'Best and most versatile land'. Residents of Northfield Park enjoy safe and convenient access to a 'Premier' convenience store (just five minutes walk away to the east) for the purchase of newspapers and provisions, a 'Tesco Express' store and 'The Seagull' public house just 4 minutes walk to the south, and the Westlands Medical Centre (11 minutes walk to the southeast). Portchester train station is 12 minutes walk away to the east, while Dore Avenue forms part of the route followed by the 'First' bus service that takes passengers southeast to Portchester district centre and then east to Cosham district centre via Paulsgrove. Northfield Park is a sustainable location for aged-persons' park homes. Northfield Park and Eleanor's Wood (to the west of Dore Avenue, Portchester) together comprise 71 residential park homes and the park rules require that "All persons residing on the park must be 55 years of age or over." Turnover rates are low (only 30 have changed hands since 2013) but demand is consistently high, especially from local people who wish to retain their independence by down-sizing to a home with reduced maintenance liabilities, within an established aged-persons community. The majority of the new residents have come from local post-code areas (PO2, PO7, PO12, PO16), with a small number from further afield (eg Bristol, Middlesex) that wished to spend their retirement years close to relatives. Mrs Trimmings wishes it to be made known that she wholeheartedly supports Housing Allocation HA40 and would be pleased to bring forward the proposal for 22 aged-persons park homes at the earliest opportunity.

**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 confirm Mrs Trimmings' wholehearted support for Housing Allocation HA40.

---

**Respondent details:**

Title:	Mrs
First Name:	J
Last Name:	Hill
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: 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**

'Tideways' (no.50) stands to the west of Newtown Road, Warsash and to the south of the 'Existing Open Space' that is the Strawberry Field. The Policies Map of the Consultation Local Plan shows the major part of the 'Tideways' site coloured beige, in recognition that it lies within the 'Urban Area Boundary' but the irregular lilac boundary of an 'Area of Special Landscape Quality' extends across it. This anomaly requires resolution - the 'urban area' of 'Tideways' should be excluded from the ASLQ. In 2014, we asked for the

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

Exclude the Tideways site from the Area of Special Landscape Quality.

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

It would remove an anomaly from the Policies Map.

**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):**

Six years ago, Fareham Borough Council failed to resolve this matter.

---

**Respondent details:**

Title:	Mr
First Name:	Roy
Last Name:	Roberts
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
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	No

**Please provide details you have to support your answers above**

The plan does not take into account accumulative impacts on infrastructural elements impacted by surrounding authorities such as Winchester council with 3000 houses fronting up the existing non motorway local road system to the proposed warsash development of 900 houses which is land locked served only by the warsash road and Brook lane/barnes lane feeding up to the A27 to confront traffic from winchesters whiteley area.. Today this is an area of frequent congestion and any further traffic density will bring an unacceptable condition for quality of life. Warsash road is also currently heavily used for access to warsash areas. other proposed areas including sovereign crescent and hunts pond road will exacerbate the situation. The plan under estimates peoples desire to move about freely with available methods of transport almost 100% car. Alternative methods of transport for day to day living quoted such as cycling and walking are fanciful and remain largely recreational only in suitable weather. Available Public transport capability comes way down the list for the means to transport large numbers of people around. some years ago there was proposed tramway system to serve this area. It never materialised. This area comprising of lock heath warsash titchfield titchfield common and park gate is already as can be confirmed by todays current situation evidence is descending into a city type housing density without the necessary transport infrastructure. with corresponding deterioration in quality of life. As an example due to the incessant drone of traffic from the A27 I cannot sleep with my bedroom window open. That is what I mean by 1 aspect of degradation in quality of life . The current situation with other infrastructural elements medical schooling etc are already having to modify to try and accommodate increasing population. for example my surgery has had to combine with others to try and spread the load with consequential increase in times to finally reach doctor appointment stage. I see no measure in the plan of what proposed housing developments will do to our quality of life. For this reason I find the plan flawed.

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

raise extensive communications with surrounding authorities to establish the real cumulative effect on infrastructural elements of the area. Pressure those authorities to stop large scale development until infrastructural degradation can be halted. Therefor housing development in the areas should be confined to much lower numbers.



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

It addresses the case of insufficient study on the effects of cumulative development and of insufficient consideration to peoples quality of life .

**Your suggested revised wording of any policy or text:**

none specific

**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):**

It is not clear from this question if a member of the public will be allowed to speak at such hearings. if So this is why i consider it necessary to present my case with further examples

---

### Respondent details:

Title:	Ms
First Name:	Amy
Last Name:	Robjohns
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

### 1) Paragraph: 5.1

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

### Please provide details you have to support your answers above

Building on SINCs is not ok or justifiable. SINCs should be incorporated into the local plan. Also, the current plans to deal with the negative impacts of recreational disturbance on the Solent's SPAs is not good enough and is not working. Surely Fareham, and indeed the rest of the Solent, must pause house building (like it did recently due to other issues impacting the area) until a better solution is found. The disturbance levels in the Solent's SPAs is recognised as being high and yet very little is being done to reduce this. This results in negative impacts to the birds who are the reason why these designated areas exist. This summer the key tern roosts in the summer were abandoned due to very high levels of disturbance and it seems to get worse every year. At hill head / Brownwich area, disturbance is bad all year round but the beaches are important all year round for migrating, wintering & breeding birds. BirdAware along is not and will not work. Please stop throwing money at a scheme which isn't solving the problem just to tick boxes. Education is important, but so too is forcing people to comply and leave the beaches free for birds whose lives depend on them. They lose lots of energy each time they are disturbed and it takes hours (or days) to regain that lost energy. Sometimes they don't regain it. This can impact on their ability to migrate, breed and ultimately to survive. Everything about the management of Fareham's beaches is wrongly about people (even your website still says nothing about the SPAs and simply tells people where they can swim...). The new posters at hill head & Meonshore also aren't being as effective as hoped. There is still high levels of disturbance. This needs to change. Even if what's currently happening regarding disturbance is "legal", it shouldn't be, and given the negative impact disturbance has on these sites, it really ought to lead to more action, putting wildlife first at long last. Indeed, action is supposed to be taken to stop activities negatively impacting SPAs. Increasing numbers of houses will bring more people & dogs and thus make the problem worse. In Fareham, the local beaches already can't cope with the sheer number of people either. There is not enough parking (too many cars & poor buses) so the local roads are a nightmare. There is not enough space for more parking spaces.

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

More real action to reduce recreational disturbance on the Solent's SPAs. BirdAware along is not working. "Migration" in the form of money isn't working.

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

If disturbance to the SPAs is significantly reduced, then the SPAs will at last be doing their job of protecting species. BirdAware's plan isn't even to reduce current levels of disturbance which is very worrying

**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

---

**Respondent details:**

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

**1) 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**

Para 9.10 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?**

no comment

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

no comment

**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

## 2) Paragraph: 10.26

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

### **Please provide details you have to support your answers above**

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

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

n/a

### **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)?**

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

---

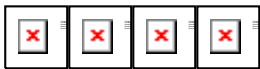


**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 18 December 2020 15:33  
**To:** Planning Policy  
**Subject:** FW: RSPB Response to Fareham Borough Council Publication Local Plan 2037  
**Attachments:** RSPB-Response-to-Fareham-Borough-Council-Publication-Local-Plan-2037.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Jack Thompson [REDACTED]  
**Sent:** 18 December 2020 13:25  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** RSPB Response to Fareham Borough Council Publication Local Plan 2037

Dear Sir/Madam,

Please see attached the RSPB's response to Fareham Borough Council's Publication Local Plan 2037 consultation.

Please would you be able to confirm safe receipt of this email and the attached response.

If you have any issues or queries, please do not hesitate to get in touch.

Kind Regards,

**Jack Thompson**  
Conservation Officer

**RSPB England - Brighton Office** 1st Floor Pavilion View, 19 New Road, Brighton, BN1 1UF  
Tel 07734 728865

Please direct any new planning enquiries to [SEplanning@rspb.org.uk](mailto:SEplanning@rspb.org.uk)

[rspb.org.uk](http://rspb.org.uk)  
**Let's give nature a home**



The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654



This email and any attachments may contain material that is confidential, subject to copyright and intended for the addressee only. If you are not the named recipient you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender and then delete this email from your system. The Royal Society for the Protection of Birds (RSPB) is a registered charity in England and Wales no. 207076 and in Scotland no. SC037654.

The RSPB is committed to maintaining your data privacy. We promise to keep your details safe and will never sell them on to third parties. To find out more about how we use your information please read our [online Privacy Policy](#).

Planning Strategy  
Department of Planning and Regeneration  
Fareham Borough Council  
Civic Offices, Civic Way  
Fareham  
Hampshire  
PO16 7AZ

By email only: [consultation@fareham.gov.uk](mailto:consultation@fareham.gov.uk)

18th December 2020

Dear Sir/Madam

**Re: Fareham Borough Council Publication Local Plan 2037**

---

Thank you for consulting the RSPB on Fareham Borough Council's Publication Local Plan 2037 consultation. We have reviewed the Publication Local Plan 2037 and would like to make the following comments. We have focused our response on the sections of the local plan relating to **Housing Need and Supply** and the **Natural Environment**.

**Housing Need and Supply**

The RSPB had previously responded to Fareham Borough Council's consultation for Local Plan 2037 Supplement and Strategic Housing and Employment Land Availability Assessment (SHELAA) (February 2020) regarding concerns for sites considered by Fareham Borough Council during the SHELAA process. The RSPB highlighted two areas of concern relating to Romsey Avenue, Portchester (site ID: 207) and Land between Fareham and Stubbington (site IDs: 1341, 3008, 3059, 3190, 3199, 3200). Our concerns highlighted the inappropriate locations of these sites within the Solent Wader and Brent Goose Strategy (SWBGS); containing **one Primary Support** site, **two Secondary Support** sites, and **five Low Use** sites. The RSPB's response to Fareham Local Plan 2037 SHELAA can be found in **Appendix I**.

We welcome the exclusion of the above sites from Fareham Borough Council's Local Plan. In-combination effects of development within Fareham Borough Council are required to be assessed for impacts on the wider SWBGS network of sites and its connectivity as functionally-linked land to the Solent Special Protection Areas (SPAs). Discounting the above sites will help to protect one of the last stepping-stones between Portsmouth Harbour SPA and Southampton Water SPA from significant impacts through development and loss of SWBGS sites. It is acknowledged that sites that impact the SWBGS network may come forward outside of the local plan allocations and therefore Policy NE5 will be key in informing the requirements for these sites. We would urge that this policy makes specific reference to the SWBG Guidance on Mitigation and Off-setting Requirements (2018 and subsequent updates) for additional

**RSPB Brighton Office**  
1<sup>st</sup> Floor, Pavilion View  
19 New Road  
Brighton  
BN1 1UF

**Tel:** 01273 775333  
**Facebook:** RSPBEngland  
**Twitter:** @RSPBEngland  
**[rspb.org.uk](http://rspb.org.uk)**



The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

detail and would suggest that any mitigation is agreed with the SWBG Steering Group as well as the Council.

The RSPB also welcomes the inclusion of site-specific requirements addressing indirect impacts on SWBGS sites and the Solent SPAs for remaining site allocations that are relevant to these protected sites. Fareham Borough Council have identified sites that are not consistent with the SWBGS mitigation guidance<sup>1</sup> and discounted these sites at the appropriate stage. Sites that remain with the potential to have adverse impacts upon the SWBGS site network or Solent SPAs must ensure that site-specific requirements for Construction Environmental Management Plans (CEMPs) and site design plans to avoid potential adverse impacts highlighted within Fareham Borough Council's Publication Local Plan 2037 are adhered to.

#### **Eutrophication in the designated sites in the Solent area**

The RSPB is increasingly concerned about the impact poor water quality and particularly nutrient enrichment is having on the designated sites and their features. Therefore, we are very supportive of the inclusion of Policy NE4, however, in its current form this text only sets out what is legally required. It would be useful to include some further policy wording around the need for developments to demonstrate nutrient neutrality or provide nutrient mitigation to achieve this as detailed in the following supportive text. We particularly welcome the supporting text para. 9.54 to target nutrient enrichment issues impacted the designation and the need to provide a net reduction. We would encourage the Council to explore enhancing areas for biodiversity as part of any mitigation to address nutrient enrichment.

We hope you find these comments useful. We would welcome the opportunity to discuss these comments with you in further detail.

Yours sincerely



**Jack Thompson**  
**Conservation Officer**

**Email:**

**Phone:**



---

<sup>1</sup> SWBGS Steering Group (2018) Solent Waders and Brent Goose Strategy (SWBGS): Guidance on Mitigation and Off-setting Requirements.

## Appendix I – RSPB response to Fareham Local Plan 2037 SHELAA, February 2020

### SHELAA

The RSPB recognises the challenges that Fareham Borough Council faces as it seeks to accommodate development on a scale predicted to be required within the Plan period. However, the RSPB is increasingly concerned by the incremental loss of Special Protection Area (SPA) supporting sites across the Solent and therefore concern by the number of sites assessed as developable within Fareham Borough Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) which are part of the network of sites used by brent geese and waders.

Dark-bellied Brent Geese (*Branta bernicla bernicla*) are winter visitors to the Solent from their breeding grounds in Siberia. Traditionally wintering on coastal mud flats, terrestrial feeding sites such as farmland with cereals and pasture or amenity grasslands are important feeding sites for Brent Geese, with greatest use at high tide when coastal mud flats are unavailable to Brent Geese. Maintaining and enhancing scale and connectivity of these important high tide feeding and roosting sites for Brent Geese is extremely important in order to prevent the loss of wintering Brent Geese and waders.

We acknowledge the inclusion of impacts to sites identified in the Solent Wader and Brent Goose Strategy (SWBGS) within the assessment of site suitability within Fareham Borough's SHELAA. However, across the sites assessed as developable within the SHELAA **one Primary Support** site, **four Secondary Support** sites, and **nine Low Use** sites within the SWBGS will be lost or partially lost. Sites within the SWBGS are classified based on value of the site in the context of the wider network of sites, its populations in terms of national importance, and the maximum count of bird use at the site. Further information on classification can be found in the SWBGS Guidance on Mitigation and Off-setting Requirements (October 2018)<sup>2</sup> and Interim Project Report: Year Two (2019)<sup>3</sup>. We provide further comment on these sites below.

#### Romsey Avenue, Portchester

Romsey Avenue, Portchester (SHELAA site 207) has been identified as a 'Developable Housing Site' within Fareham Borough's SHELAA. The 12.71ha site is a Brent Geese and Solent Waders Primary Support Area. The Ecology Comment for Romsey Avenue identifies that '*partial retention of the site and its enhancement, along with financial contribution, is required to mitigate for loss of a Primary Support Area*'. Any mitigation or compensation for the loss of a Primary Support site within the SWBGS network must ensure the continued ecological function ensuring that there are significant net benefits to the wader and brent goose network through the creation and ongoing management of any replacement sites. It is preferred that schemes affecting Primary Support Areas such as this come through the local plan process, however, we are aware that a planning application for this development (P/18/1073/FP) has been submitted and is currently under consideration. The proposed Bird Conservation Area associated with this application represents a 78% reduction in the size of the Primary Support site. This is wholly inadequate to appropriately mitigate for the partial loss of the Primary Support site. Mitigation in relation to recreational disturbance of the retained area of SWBGS Primary Support site has not been considered and will need to be included in the mitigation required for the Romsey Avenue development. Therefore, based on the current information it cannot be excluded that the allocation of this site will result in an adverse impact on the integrity of the SPA.

Further work undertaken as part of the SWBGS has looked to identify areas suitable for strategic wader and brent goose reserves. This area including the allocation would be ideally placed to form part of the network of sites retained to support the SPA, we therefore urge the removal of this allocation.



### Land between Fareham and Stubbington

Land between Fareham and Stubbington has been identified as a Strategic Growth Area. This area contains the largest proportion of sites assessed as developable within the SHELAA. We highlight those sites below:


- Land South of Longfield Avenue, Fareham (SHELAA site 3008) – identified as containing both SWBGS **Secondary Support** and **Low Use** sites.
- Land South of Oakcroft Lane, Stubbington (SHELAA site 1341) – identified as containing both SWBGS **Secondary Support** and **Low Use** sites.
- Land East of Titchfield Road, Titchfield (SHELAA site 3059) – identified as containing SWBGS **Low Use** site.
- Land at Titchfield Road and Ranvilles Lane (SHELAA site 3190) – identified as containing SWBGS **Low Use** site.
- Newlands Plus – Area B1 and B2 (SHELAA sites 3199 and 3200) – both are identified as containing SWBGS **Low Use** sites.

SWBGS Guidance on Mitigation and Off-setting Requirements (October 2018) states in paragraph 24 under *Secondary Support Areas* that *‘In-combination, these sites (Secondary Support Areas) are essential to secure a long term, permanent network as this ensures a geographical spread of sites across the wider ecological network, thereby meeting the needs of each discrete subpopulation’*. Paragraph 35 under *Low Use* outlines the wider importance of Low Use sites: *‘All Low Use sites have the potential to be used by waders or brent geese. These sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network. In all cases proportionate mitigation, off-setting and/or enhancement measures will be required.’*

Considering the annual housing need for Fareham Borough at 520 houses per year, with a total requirement for 8,320 new houses developed over the duration of the Local Plan (not including the 10-15% buffer proposed for the new Local Plan), the RSPB is concerned by the proposed loss of sites between Fareham and Stubbington and the impact that these developments in-combination will have on the wider SWBGS network of sites and its connectivity. The land between Fareham and Stubbington provides one of the last stepping-stones between SWBGS sites from Portsmouth Harbour SPA to the east of the Borough and Southampton Water SPA to the west. Therefore, the assessment of this in-combination effort of the loss of these sites identified in the SHELAA needs to be considered within Fareham Borough Council Local Plan. Further, any development identified within 5.6km of the Solent SPAs will need to contribute towards the Solent Recreation Mitigation Strategy (SRMP). Development located immediately adjacent is likely to require more than financial contribution to the strategy in order to fully mitigate likely significant impacts upon the SPAs.

---

**Respondent details:**

Title:	Mrs
First Name:	Hazel
Last Name:	Russell
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

**MATTERS OF LEGAL COMPLIANCE** Community Involvement Since 2017 Residents concerns have been disregarded even though there have been Protest Marches, deputations and countless objections raised. For example: despite a petition exceeding the required number of signatures needed to trigger a Full Council meeting debate, the 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. For example: residents knowledge about the previous use of land in Nitrate budget calculations and traffic survey results captured by residents and Community Speed Watch Teams. Para 4.7. The Warsash Neighbourhood Forum (now defunct) was never consulted with respect to the Council's intention to allocate housing to Warsash as required by Para 66 of the NPFF. Para 1.5 Introduction: Statement of Community Involvement para 2.1 states a "variety of methods" should be used to solicit comments from the public. Paper documents failed to be delivered across the Borough (Fareham Today) so a large proportion of residents were deprived of giving their comments or perhaps aren't even aware that a new Draft Local Plan exists on which they can comment. The fact that access to libraries and the Council office has been restricted due to Covid has made matters worse. The Publication Plan Introduction on Page 1 states that representations should focus solely on "Tests of Soundness". However, FBC's guidance in Fareham Today contradicts this and includes additional areas of "Legal Compliance" and "Duty to Cooperate". This is confusing and misleading to residents wanting to submit representations.

2. Housing Allocations The total of new homes required proposed for specific sites across the Borough (excluding Welborne) is 1,342. Of these 830 of them, 62%, are proposed for HA1 (Warsash). This huge concentration of new homes in one small area is an unfair distribution of Housing Allocation in an already overburdened area for which no new infrastructure is planned. FBC recently secured an overall REDUCTION in new housing of 22.5%. Despite this FBC are proposing HA1 (Warsash) should endure a 20% INCREASE in their housing allocation number. This seems unjustifiable. Within HA1 there is no joined up "Master Plan". Developers are working in complete isolation from one another resulting in an unnecessary number of access roads, some within yards of each other. Another Environmental Impact Plan must be conducted showing the cumulative effect of housing allocation in HA1 in it's entirety. Para 4.19. Housing Allocations HA2,5,6,8,11,18,20,21, and 25 are no longer proposed Housing Allocations. Instead 62% of Housing Allocations are in the small area of HA1. Why has HA1 been singled out for Housing Allocation? How was the Objectively Assessed Housing Need arrived at for this area? Para 1.16: HA1 did not feature in the 2015 Local Plan and Officers confirm it is the 2015 Plan which is extant. No mention is made of the unadopted 2017 Draft Local Plan. Para 4.8 allows the LPA to consider Housing sites in the previous adopted (extant) Local Plan. On page 38 this is ignored and it states that Housing Allocation will be provided in the unadopted 2017 Draft Local Plan locations including HA1 and other local sites. The LPA's decision to include HA1 in the unadopted 2017 Draft Local Plan led to a frenzy of Applications submitted by Developers taking advantage of the situation. The LPA have resolved to grant permission on these Applications many ahead of and likely contrary to the Publication Plan. The LPA has also adjusted the boundaries of HA1 to accommodate Developers claiming their Applications on sites outside HA1 fit well with HA1. This demonstrates that as regards Housing Allocation and development there seems to have been an inappropriate power shift toward the Developers while residents concerns (Community Involvement) are disregarded.

3. Habitats Directive Strategic Policy NE1 requires designated sites (SACs, SPAs and RAMSARs) to be protected and ENHANCED. Likewise in Strategic Policy NE4 para 9.50 confirms permissions will be granted when the integrity be maintained or IMPROVED. In addition on page 199 para 9.54 indicates that proposals for development should provide a net REDUCTION in eutrophication for designated sites which are in an unfavourable condition. The LPA is however only aspiring to NITRATE NEUTRALITY. This therefore contravenes both the Habitats Directive and the Publication Plan. In the opinion of a leading QC it is unclear how any developments could be contemplated in the Western Wards of the Borough without negatively impacting the SAC, SPA and RAMSAR sites. Therefore, based on proximity alone, this would invalidate the deliverability of any of these developments. Advice from Natural England states it is the responsibility of the LPA to fulfil it's legal obligations. They must satisfy themselves BEYOND SCIENTIFIC DOUBT that adverse effects on the designated SAC, SPA and RAMSAR sites from harmful nutrients generated by new residential developments have been mitigated (and not just compensated for). There is doubt that the LPA is applying the Natural England advice correctly and lawfully. Complies with Duty to Cooperate

1. Housing Need Methodology Para 1.28: FBC have agreed to take up a shortfall in homes from Portsmouth of 847 dwellings. This is a risk for FBC as the new methodology for calculating Housing Need has not yet been signed off by the Government. Also the Housing Delivery Test will not be available during this public consultation period. Para 3.10: the decision to "rewild" the Stubbington Strategic Gap was made without any consultation with elected Members or Council Officers. The surprise announcement was made in a Press Release issued after the start of the Full Council meeting which was in the process of debating this Plan. It is astounding that such an important decision should have been made secretly, by whom, no one publicly knows, and that it was not included within the Plan itself. For such a huge area of land to not be included in the consideration of use of land for Housing thus relieving hard hit areas such as HA1 seems inconceivable. This area also has the infrastructure of a new road already in place. Why was it not assessment for Housing Need?

## Please provide details you have to support your answers above

**Test of Soundness Settlement Definition** In the Forward to the Publication Plan it is stated "Greenfield sites are less favoured locations for development". Para 2.1 states "Fareham Borough Council (FBC) will RETAIN its identity, valued landscapes and SETTLEMENT DEFINITION and will protect it's natural, built and historic assets". Further, Para 2.12 "Strategic Priorities" states "FBC will strive to maximise development within the Urban Area and away from the wider countryside and to create places which encourage healthier lifestyles". It is unbelievable then to find that it is proposed that Policy HA1, currently Greenfield, is to be re-designated as an Urban Area (via the re-definition of Settlement Boundaries ref WW17). This re-designation from Greenfield status to Urban status and the movement of the Settlement Boundary in order to accommodate the inclusion of further developments put forward by developers totally contradicts what is stated in the Publication Plan. It is a blatant and unethical manoeuvre by FBC by stealth to suit it's own objectives to concentrate 62% of new housing in one small area without any Infrastructure improvements. 2. Strategic Policy DS1 (Pares 3.36 and 5.6) 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. Before it's proposed re-designation to Urban Status, HA1 is defined as countryside and has no previously developed land so cannot be used in such a way under the Publication Plan. To achieve it's objectives for 62% of Housing Allocation to be in HA1, FBC has conveniently redrawn the urban boundary. **Infrastructure** Policy HP4, Para 5.24. HA1 fails to meet criteria e). The plan for the development of HA1 would demonstrably have unacceptable environmental, amenity and traffic implications. 2. Page 51 refers to traffic routes in HA1. There have been previous recommendations to limit the number of dwellings having direct access onto Greenaway Lane in HA1 to 6 because it was recognised that the Lane is unique in Warsash due to it's rural feel. It is very narrow in places, there are no pavements just some grass verges and there are ancient ditches and lots of trees at the eastern end. It is widely used recreationally. The Publication Plan proposes that the number of dwellings with direct access be increased to 140 and the Lane will be widened (how on earth could this be achieved?) The character of the Lane will be destroyed and there will be a considerable impact on the safety of the large number of non-vehicular users. The Publication Plan, Page 54, highlights that there will be 7 new access roads onto Brook Lane, an already busy main road, and Lockwood Road from all the individual developments in HA1. Additionally, the Greenaway Lane access onto Brook Lane, which is situated on a bend in Brook Lane, will become exceptionally busy as the extra vehicles from the 140 new dwellings will feed into it. The number, position and proximity of the new roads onto Brook Lane are a result of the lack of a cohesive Master Plan for HA1, the lack of a cumulative view combined with the lack of connectivity between adjacent sites. It is piecemeal development at its worst and will undoubtedly lead to gridlock and accident black spots on Greenaway Lane and Brook Lane. Para 10.5 does not include an analysis of streets where the majority of the new dwellings are proposed. Why hasn't HA1 had more consideration in the Transport Assessment when there are 830 new dwellings proposed for this area (62% of the total for Fareham)? With an average of 2 cars per dwelling, an additional 1,660 vehicles will be on local roads in Warsash and there is no reference to the mitigation required to reduce the resulting congestion by 2037. The Publication Plan fails the Test of Soundness by not focusing on this impact. The Publication Plan Strategic Transport Assessment at Para 14.16 states "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 Publication Plan for which 830 dwellings within piecemeal developments are planned. HA1 isn't included within the Local Plan Strategic Transport Assessment. Page 52 indicates the need for the provision of "2 junior football pitches" within HA1. Why are these not shown on the Masterplan? **Housing Need Methodology** Para 3.27, fig 3.2. There are more than the 8 indicated potential growth areas shown on the map (assuming these are construed as being the proposed allocations. The map is wrong. 2. Para 3.37 is in conflict with Para 4.13 over the definition of small scale development. Is it sites of less than 1 Ha or a development of not more than 4 dwellings? 3. Para 4.2 of the Publication Plan is Unsound. It bases housing numbers on a proposed new methodology for calculating Housing Need. There is a tangible risk that this methodology may not be adopted by the Government. Also Page 37, Paras 4.12 4.16 and Policy HA1 illustrates that whilst a contingency buffer of 1,094 dwellings has been made, this Publication Plan is heavily reliant on the delivery of 4,858 dwellings at Welborne. This is by no means a certainty. **Occupancy Rates** Para 5.41. As regards the Nitrate Budget Calculations the LPA is using an average occupancy rate of 2.4 persons for a 4/5 bedroom dwelling. As regards the occupancy rate in this section, however, it states that the spectrum of occupancy for affordable homes will be in the range of 4-6. The Publication Plan's claims are not reflected in FBC's own proposals and requirements. This does not pass the Test of Soundness. **Carbon Reduction** The Publication Plan is not Positively Prepared. Section 8, Para 8.60 talks about the requirement of meeting CO2 Emission Reduction Targets. However it fails to state what the targets are. Instead, the Publication Plan refers to individual developments power generation rather than what each development should deliver over and above the Building Regulations requirements. 2. Para 11.34. The Publication Plan is not Sound as it does not provide an effective approach to Carbon Emissions reduction in the Borough of Fareham. It is stated that Applications will be supported where the development exceeds Building Regulations but no percentage target is set. 3. Para 11.36. No standards are set for Developers who are being encouraged to design for Natural Ventilation and Green Infrastructure. Just meeting Building Regulations will not see FBC contributing to the Government's promised Carbon Reductions. Why have standards not been set within this Publication Plan to ensure Developers are designing for sustainability even though such standards may not yet be within the Building Regulations. **Retail Facilities** Para 7.13. No additional Convenience Goods floor space has been allocated for Warsash. Existing local retail/commercial facilities do not cater for the additional people 830 new dwellings already planned for HA1 (Warsash) will bring. 2. Para 7.18. Out of town shopping is discussed but not defined. The use of out of town

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

See attached comments. All points made to be considered, answered and debated. The Plan to be then modified as appropriate.

See attached comments

---

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

See attached comments pointing out the failure of the Plan being legally compliant or sound (comments on soundness to follow). Modifications proposed would then improve the Plan.

See attached comments

---

**Your suggested revised wording of any policy or text:**

Council Officers would be best placed to revise the wording of any policy or text.

See attached 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

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

---



**Respondent details:**

Title:	mr
First Name:	richard
Last Name:	scholes
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**

The number of warsash residents that have spoken against previous house numbers planned in warsash, the total disregard by the council to the petition raised by warsash residents, and the failure to reduce the numbers of proposed house in warsash despite Fareham having an overall reduction in numbers requirement

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

Reduce the amount of houses proposed in Warsash

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

It would make it sound by not saturating one small area to provide 11 perc of the overall numbers and stop the change of nature of Warsash and stop filling up green space as there is very little between Bursledon, Parkgate, Sarisbury green, Burridge, Locks heath and warsash as shown by looking at google maps of the area

**Your suggested revised wording of any policy or text:**

na

**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):**

So that I know you have heard my views

**Respondent details:**

Title:	MRS
First Name:	mary
Last Name:	scobell
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	No

**Please provide details you have to support your answers above**

Having looked at the Fareham Local Plan 2037 showing allocated plots for potential new housing I'd like to express my concern particularly for plot HA42 land south of Cams Alders, Trafalger/Jubilee Court. With this space being a site of importance for nature conservation (SINC) why is there a need to encroach on this SINC when there are other allocated areas that are not of such high importance (nature conservation wise) that would not have such an impact on the surroundings and local wildlife. The national planning policy framework states strategic policies should, as a minimum, provide for objectively assessed needs for housing. The local plan suggests that there would be sheltered accommodation within the HA42 plan, currently there is sheltered accommodation with in Trafalger Court, is this complex always full? Having lived in this area for 22 years I have known there to nearly always be empty flats, yesterday I counted 4 and that was just from the outside road without walking into the complex to ascertain how many others are empty. How great is the need for more that it requires dwellings to be squeezed into this small but significant area for nature conservation, there needs to be preservation of the special character of this setting and the importance be recognised. The benefit of this undeveloped land and that it performs many functions, such as for wildlife, and recreation for children and surrounding families is greatly appreciated by the local community. The national planning policy framework also states its aim is to protect, enhance and identify, map and safeguard components of local wildlife-rich habitats. Area HA42 is a said wild life enriched area, home to badgers, bats, deer, frogs, birds (including owls & woodpeckers), visiting birds including heron, egrets, ducks and many other animals, some of which are protected. Development however small would result in the loss or deterioration of irreplaceable habitats and the surrounding SINC. Increased noise, traffic and light pollution would also be detrimental to the surrounding wildlife.

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

For this site not to be developed and remain wholly a site of importance for nature conservation.

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

it would remain as is.

**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

---

**Respondent details:**

Title:	Mr
First Name:	Chris
Last Name:	Sherman
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**

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

---

**Respondent details:**

Title:	Mrs
First Name:	Joan
Last Name:	Sims
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
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

Housing Allocation Policy: HA9 SHELAA Reference: 1007 Name: Heath Road Allocated Use: Residential Location: Locks Heath Indicative Yield: 70 dwellings Size: 2.43 ha Planning Status as at 1 July 2020: Resolution to grant permission The above proposed development area is unsound, in that it contravenes : a) the Government Guidelines on biodiversity and Ecosystems (<https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems>) which direct all public authorities to conserve and enhance biodiversity b) The National Planning Policy Framework (NPPF) para. 170 "Planning policies and decisions should contribute to and enhance the natural and local environment ---" and "----minimising impacts on and providing net gains for biodiversity" and para 175 "development resulting in the loss or deterioration of irreplaceable habitats ---- should be refused" c) its own Local Plan Strategic Priorities 2.12 "9. Protect and enhance the Borough's landscape features, valued landscapes, biodiversity,-----" d) ditto, para.9.15 : "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are reasons of overriding public interests and a suitable compensation strategy." e) ditto, Strategic Policy NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network : "----Development within the Borough whose primary objective is to conserve and enhance biodiversity ----" and it ignores f) its own Sustainability Appraisal para 6.8.1 "Biodiversity in the borough is likely to be affected by development proposals, although policies DSP13-15 include requirements for biodiversity gain and avoidance of negative impacts" - The development of HA9 does not conserve or enhance biodiversity; it destroys it. HA9 is the last remaining area of wildness in Locks Heath. As an area of secondary woodland and scrub, it is the last undisturbed habitat for birds and mammals (mice, squirrels, hedgehogs, foxes, deer, and perhaps badgers). It is the major source of the biodiversity of Locks Heath and is an irreplaceable natural habitat. It should not be selected as a development site in the first place. Its development would have a considerable adverse impact on the local biodiversity. However, but if that is inevitable, then its plan must designate a considerable area of 'Corridors and areas managed for wildlife and biodiversity with no public access', as in HA1. To merely retain isolated trees and surround them with mown grass destroys all existing shelter and food supply for the current wildlife in the area. ---- The inclusion of HA9 as a development site with 70 additional homes is unsound in that it is not consistent with national policy as regards accessible services. a) on traffic It ignores its own Sustainability Appraisal para 4.7.1 : " Many key roads and junctions in the wider area suffer from severe congestion---- --- the scale of development proposed, together with anticipated growth in the demand for travel from existing communities within the sub-region, will place further demand on already stretched transport networks. In this context demand management measures will be required to limit the effects of growth in the area" - The suggestion that the major exit should be onto Heath Road is wrong; at peak times, the traffic on this road is already constant, with hold-ups at the junction with Locks Road, and the proposed development of HA1 and other areas in Warsash, will cause this to get worse. b) on Primary Care Provision It ignores its own Infrastructure Delivery Plan for Primary Care Provision (page 41) : "Proposed development in Locks heath (HA9 Heath Road---) : There are two primary care practices located near to this development, Locks wood Surgery and brook Lane Surgery. At this stage neither practice has scope to expand their current estate and therefore the CCG would not be assured that the practices would be able to cope with a significant growth in their list size." - it is already almost impossible to make a doctors' appointment ---- The inclusion of HA9 as a development site with 70 additional homes is unsound in that it is not consistent with NPPF policy on Climate Change : para 149 "plans should take --- into account the long-term implications for flood risk ---- and the risk of overheating from rising temperatures" - The subsoil is gravel and clay (of Bracklesham & Barton Beds). Surface water does not drain well. An increase in roofs & hard surfaces in HAP and a decrease in tree roots and vegetation will increase the danger of flash flooding onto Heath Road. It also contravenes the Fareham's own declared policies in the Plan's para 9.81 : "Trees, woodlands and hedgerows contribute to the environment in many ways; they improve the quality of the air removing dust particles and harmful gas emissions such as carbon dioxide. In urban areas they help to reduce the heat island effect, reduce soil erosion and flash flooding by slowing down and capturing fast flowing water. In addition, trees, woodlands and hedgerows help to improve biodiversity and provide landscape character whilst also adding a sense of place in our communities. These benefits all help to improve the health and wellbeing of people and in turn improve the quality of life for those who live and work in Fareham. - It is the lung for surrounding homes. Its loss will degrade air quality and increase pollution along Heath Road. - It contains the last remaining traces of the former character of Locks Heath, giving it its name. It gives a sense of place and makes Locks Heath 'home'. Without it we shall just be another artificial desert.

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

De-classify HA9 as a Development Site. If that is unavoidable, then a) designate a large area of natural habitat without public access b) specify rainfall run-off depressions, to prevent flash-flooding onto Heath Road c) specify no vehicle exits onto Heath Road d) specify retaining the trees along the southern boundary with Heath Road to provide shade for any new houses there

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

It would make the Local Plan more compliant with preserving biodiversity, and with making provision for future climatic change.. It would lessen the impact on primary health care provision, local traffic and local character.

**Your suggested revised wording of any policy or text:**

para 4.20 Housing Allocation Policies - remove HA9 Heath Road from the list

**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:** [Consultation](#)  
**To:** [Planning Policy](#)  
**Subject:** Southern Planning Practice on behalf of Raymond Brown  
**Date:** 18 December 2020 15:50:48  
**Attachments:** [Questionnaire 21.pdf](#)  
[Questionnaire 20.pdf](#)  
[Questionnaire C1.pdf](#)  
[Questionnaire C2.pdf](#)  
[Questionnaire C3.pdf](#)  
[Questionnaire C4.pdf](#)  
[Questionnaire C5.pdf](#)  
[Questionnaire C11.pdf](#)  
[Questionnaire C17.pdf](#)  
[Questionnaire C12.pdf](#)  
[Questionnaire C18.pdf](#)  
[181220 Reps to Draft Local Plan - A27 FINAL.pdf](#)  
[Appendix 2 Phase 2 Representations to Draft Local Plan - November 2017.pdf](#)  
[Appendix 2 Phase 2 Representations to Draft Local Plan - November 2017.pdf](#)

---

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Lynne <[REDACTED]>  
**Sent:** 18 December 2020 14:03  
**To:** Consultation <[Consultation@fareham.gov.uk](mailto:Consultation@fareham.gov.uk)>  
**Subject:** Representations to Fareham Draft Local Plan - on behalf of Raymond Brown Minerals & Recycling Ltd

Please find enclosed reps to the above Plan on behalf of Raymond Brown Minerals & Recycling Ltd

The submission includes the completed reps forms together with a statement of representations including Appendices.

Please acknowledge receipt.

If you have any queries please contact Lynne Evans of this office.

Lynne Evans

Lynne Evans BA MA MRTPI MRICS

Consultant

Southern Planning Practice Ltd

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester, Hampshire, SO21 1NN

Registered in England and Wales No. 3862030

tel. +44 (0)1962) 715770

[www.southernplanning.co.uk](http://www.southernplanning.co.uk)

This email and any files transmitted with it are confidential, may be legally privileged and are for the sole use of the intended recipient. Copyright of this email and any accompanying document created by us is owned by Southern Planning Practice Ltd. If you are not the intended recipient you should not use or disclose to any other person the contents of this email or its attachments (if any), nor take copies. If you have received this email in error, please notify the sender immediately and then delete it from your system. Southern Planning Practice Ltd has taken every reasonable precaution to ensure that any attachment to this email has been swept for viruses, but Southern Planning Practice Ltd accepts no liability for any loss or damage which may be caused by software viruses.

# 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)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	
Telephone Number:	
Email Address:	

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
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 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).

3.19 - 3.21 INCLUDING FIGURE 3.1

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 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?

PLEASE SEE ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	
Telephone Number:	
Email Address:	

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
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 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

4.1 - 4.20 INCLUDING TABLES 4.1, 4.2, 4.3

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

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 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?

PLEASE SEE ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISED COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	<input type="text"/>
First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Job Title: (where relevant)	<input type="text"/>
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	<input type="text"/>
Telephone Number:	<input type="text"/>
Email Address:	<input type="text"/>

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
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

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 checked="" 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 ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	
Telephone Number:	
Email Address:	

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	
Telephone Number:	
Email Address:	

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	<input type="text"/>
First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Job Title: (where relevant)	<input type="text"/>
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	<input type="text"/>
Telephone Number:	<input type="text"/>
Email Address:	<input type="text"/>

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
Address:	<div></div>
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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

RAYMOND BROWN MINERALS AND RECYCLING LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MS

First Name:

LYNNE

Last Name:

EVANS

Job Title: (where relevant)

PLANNING CONSULTANT

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

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 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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	
First Name:	
Last Name:	
Job Title: (where relevant)	
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	
Telephone Number:	
Email Address:	

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

RAYMOND BROWN MINERALS AND RECYCLING LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MS

First Name:

LYNNE

Last Name:

EVANS

Job Title: (where relevant)

PLANNING CONSULTANT

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:	<input type="text"/>
First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Job Title: (where relevant)	<input type="text"/>
Organisation: (where relevant)	RAYMOND BROWN MINERALS AND RECYCLING LIMITED
Address:	C/O SOUTHERN PLANNING PRACTICE LIMITED
Postcode:	<input type="text"/>
Telephone Number:	<input type="text"/>
Email Address:	<input type="text"/>

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

Title:	MS
First Name:	LYNNE
Last Name:	EVANS
Job Title: (where relevant)	PLANNING CONSULTANT
Organisation: (where relevant)	SOUTHERN PLANNING PRACTICE LIMITED
Address:	<div></div>
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

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 checked="" 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 ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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

**REPRESENTATIONS TO THE  
DRAFT FAREHAM LOCAL PLAN 2037**

**On behalf of**

**Raymond Brown Minerals & Recycling Ltd**

**Lynne Evans  
BA MA MRTPI MRICS  
Consultant**



<b><u>Client:</u></b>	<b>Raymond Brown Minerals &amp; Recycling Ltd</b>
<b><u>Date:</u></b>	<b>December 2020 (FINAL DRAFT)</b>
<b><u>Ref:</u></b>	<b>F/376/LE</b>

**SOUTHERN PLANNING PRACTICE LTD**

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester, SO21 1NN  
Tel: 01962 715770 Fax: 01962 715880 Email: [info@southernplanning.co.uk](mailto:info@southernplanning.co.uk) Website: [www.southernplanning.co.uk](http://www.southernplanning.co.uk)  
Registered in England and Wales No. 3862030

---

<b><u>Contents:</u></b>	<b>Page</b>
<b>1.0 INTRODUCTION AND SUMMARY.....</b>	<b>1</b>
<b>2.0 OBJECTION TO STRATEGIC POLICY H1 – HOUSING PROVISION.....</b>	<b>3</b>
<b>Overview.....</b>	<b>3</b>
<b>i) Housing Numbers: Reliance on the Standard Method set out in the             ‘Changes to the Current Planning System’ White Paper. ....</b>	<b>4</b>
<b>ii) Duty to Co-Operate and Unmet Need from Neighbouring             Authorities.....</b>	<b>5</b>
<b>iii) Additional Factors affecting Fareham’s Housing Numbers .....</b>	<b>8</b>
<b>iv) Over Reliance on Welborne Garden Village .....</b>	<b>10</b>
<b>v) Affordable Housing .....</b>	<b>11</b>
<b>vi) Windfall Allowance.....</b>	<b>12</b>
<b>3.0 ANALYSIS OF HOUSING ALLOCATIONS.....</b>	<b>14</b>
<b>4.0 ROOKERY FARM .....</b>	<b>19</b>
<b>5.0 MODIFICATIONS REQUIRED TO THE PLAN TO MAKE IT SOUND .....</b>	<b>27</b>

## **Appendices:**

- 1) Rookery Farm: Site Ownership Plan
- 2) Rookery Farm: Concept Masterplan OSP Architecture 17056/C02A
- 3) Rookery Farm: Phase I Environmental Site Assessment TRC Companies Ltd 2017
- 4) Rookery Farm: Phase II Geo-Environmental Site Assessment 2018

## **1.0 INTRODUCTION AND SUMMARY**

- 1.1 Southern Planning Practice are instructed by Raymond Brown Minerals & Recycling Ltd (Raymond Brown), to submit representations to the Regulation 19 version of the Fareham Local Plan 2037. Raymond Brown is acting on behalf of the two landowners, Raymond Brown Rookery Properties Ltd and Prospective Estates Ltd (please see attached land ownership plan).
- 1.2 Raymond Brown is part of the Raymond Brown Group, a leading recycling and waste management business and distributor of primary and recycled aggregates for use in construction applications. One of their sites is at Rookery Farm, Fareham. The land is located immediately north of the M27 motorway and to the west of Whiteley. Access is from Botley Road, approximately 100m north of the bridge over the M27.
- 1.3 The Local Plan, as drafted, is assessed to be UNSOUND and also fails to comply with the Duty to Co-Operate. These representations set out the reasons why: -
- 1.the Plan is considered to be UNSOUND and
  - 2.fails to comply with the Duty to Co-Operate
- and sets out the steps that require to be taken to make the Plan SOUND.
- 1.4 Separate representation forms have been submitted against each policy and paragraph which is considered to be UNSOUND, but the case to be made is set out in full in this document.
- 1.5 In summary, OBJECTION is raised to Strategic Policy H1 Housing Provision on the grounds that the figures promoted are not soundly based or justified. This is addressed in detail in Section 2.0. Objection is also raised to the allocation of a number of the housing sites in that they are not suitable, and /or available and/or achievable, particularly within the Local Plan period. This is addressed under Section 3.0.
- 1.6 Section 4.0 sets out why Land at Rookery Farm should be allocated as a Housing Site to start to address the issues identified in Sections 2.0 and 3.0. Section 5.0 draws these matters together with consideration of modifications that are required to be made to the Plan

to ensure that it is SOUND and will provide a sound planning framework to deliver the much needed housing over the Plan Period.

- 1.7 It is concluded that the Plan cannot be made SOUND without a fundamental review of the main elements of the housing figures, including methodology and will require additional sites to be allocated; Rookery Farm should be included as an allocation in the Plan, being suitable, available and achievable and, indeed, deliverable.
- 1.8 Objections are therefore raised to Policies H1, FTC1, FTC2, FTC3, FTC4, FTC5, HA7, HA13 and the omission of an allocation for housing for Rookery Farm, Botley Road, Fareham. Objections are also raised to paragraphs 3.19 (including Figure 3.1) as well as paragraphs 4.1 – 4.20 including Tables 4.1, 4.2 and 4.3.



## 2.0 **OBJECTION to Strategic Policy H1 – Housing Provision**

### **Overview**

- 2.1 The objections to this Policy are several and are addressed individually below. The individual and cumulative failings render the policy UNSOUND and as Strategic Policy H1 forms the basis for the provision of much needed housing across the whole Borough, it follows that the whole Plan is rendered UNSOUND. It should be noted that although the issues have been subdivided into several sections, many of the issues interrelate and cumulatively exacerbate the conclusions drawn that the Council is failing to provide properly for its housing need.
- 2.2 The objections to this Policy include:
- (i) The Housing Numbers used and in particular the reliance on the draft Standard Method set out in the Changes to the Current Planning System in the Government's White Paper;
  - (ii) Duty to Co-Operate and Unmet Need – Fareham has not undertaken this Duty in a sound manner;
  - (iii) Additional factors Contributing to the Shortfall, including the 5 year Housing Land Supply Position;
  - (iv) Over-reliance on Welborne to provide a significant proportion of Fareham's housing which is considered unachievable, resulting in a need for more sites to be allocated;
  - (v) Inability to meet the identified Affordable Housing Provision;
  - (vi) Over-reliance on Windfall allowance
- 2.3 Before analysing the approach adopted by Fareham, it is first worth reviewing the clear guidance on the approach to be followed as set out under the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). It is important to note that the NPPF makes it clear that "*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*" (Paragraph 11).
- 2.4 Paragraph 60 builds on this and states that "*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional*

*circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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.*" This clarifies how the housing numbers calculated by the standard method should be considered when preparing a Local Plan. Paragraph: 004 (Reference ID: 2a-004-20190220) of the Planning Practice Guidance confirms that the standard method should be used to calculate a **minimum** (emphasis added) housing need figure.

2.5 In addition to the Borough's own housing needs, as acknowledged by the draft Local Plan, its housing figure needs to incorporate the needs of neighbouring authorities. Paragraph 35 a) of the NPPF sets out that in order for a plan to be sound it must be positively prepared *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (our emphasis); 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"*.

2.6 The following sections demonstrate how Fareham has failed to follow this clear guidance with the result that Strategic Policy H1 and the Plan is UNSOUND.

i) **Housing Numbers: Reliance on the Standard Method set out in the 'Changes to the Current Planning System' White Paper.**

2.7 The Publication Draft correctly points out at Para 4.2 that *'Local housing need should be determined by using the Standard Method set out in national Planning Practice Guidance (PPG). This Method 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).'*

2.8 Fareham, however, has chosen to use the new Standard Method set out in the 'Changes to the Current Planning System' White Paper, which was published on 6<sup>th</sup> August 2020 with consultation closing on 1<sup>st</sup> October 2020.

2.9 Para 4.2 of the Publication Draft explains why the Council has 'jumped the gun' and used the draft new Method:

*'The Council therefore considers it appropriate for this Publication Local Plan to plan for a scale of growth based on the proposed new Method, 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. The new Method would be introduced with a change to the PPG and the timing of submission of this plan for examination will be determined by the precise wording of the government policy.'*

- 2.10 ON 16 DECEMBER 2020, GOVERNMENT ANNOUNCED THEIR RESPONSE TO THE 'CHANGES TO THE CURRENT PLANNING SYSTEM' WHITE PAPER AND PUBLISHED REVISED PROPOSALS FOR ENABLING THE DELIVERY OF MORE HOMES ACROSS ENGLAND. IT IS UNDERSTOOD THAT GOVERNMENT WILL NOT NOW PROCEED WITH THE DRAFT NEW STANDARD METHODOLOGY ANNOUNCED EARLIER IN THE YEAR AND ON WHICH FAREHAM HAS BASED ITS HOUSING NUMBERS. INSTEAD, THE GOVERNMENT HAS ANNOUNCED THAT IT WILL CONTINUE TO RETAIN THE STANDARD METHOD IN ITS CURRENT FORM WITH THE ADDITION OF A 'TOP-UP' APPLICABLE TO ENGLAND'S 20 LARGEST CITIES. PLEASE SEE LINK:

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

- 2.11 It follows that the only basis that Fareham can and should proceed at the current time is to use the existing Standard Method which would result in an uplift in its dwellings per annum (dpa) from 403 to at least 514.

**ii) Duty to Co-Operate and Unmet Need from Neighbouring Authorities**

- 2.12 Fareham Borough Council is a member of the Partnership for South Hampshire (PfSH). In September 2019, Fareham Borough Council and Havant Borough Council together with all the authorities of the PfSH published a Statement of Common Ground (SOCG). The SOCG sets out how the local authorities in South Hampshire have successfully worked together on strategic planning matters and how they continue to do so. As part of the Local Plan Review, a Statement of Compliance with the Duty to Cooperate has been produced. This is in accordance with Paragraph 24 of the NPPF. This confirms that 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 (Paragraph 4.6).

- 2.13 Fareham Borough Council is identified as being within the Portsmouth Housing Market Area (HMA). The PfSH Strategic Housing Market Assessment (SHMA) indicates an overall objectively assessed need figure of 121,500 dwellings, over the whole PfSH area from 2014-2036. It should be noted that the SHMA was prepared in January 2014 and the identified housing need is not based on up to date figures, therefore its housing numbers are considered to be out-of-date. The SOCG acknowledges that the housing need figures within the PfSH Spatial Position Statement (SPS) (2016) are not in accordance with standard methodology set out in NPPF (2019). The SPS is being reviewed to bring it in line with updated development needs. However, there is no indicative timescale for the SPS review and given the recent Housing White Paper, such a statement is unlikely to come out ahead of the submission of the Fareham Local Plan.
- 2.14 One key issue arising for the PfSH Portsmouth HMA/PfSH East (Portsmouth, Havant, Fareham, Gosport, Winchester) is the challenge of delivering sufficient homes to meet the housing need of the area given the significant geographical constraints and nationally important environmental and landscape designations. It is acknowledged that some authorities within the PfSH East area are more constrained than others. Portsmouth, Havant and Gosport are all physically constrained as well as having coastal environmental designations, to varying degrees. Therefore, as Fareham Borough is less constrained and physically has the space to provide housing in addition to its own need, the Borough should look to accommodate unmet need from neighbouring authorities.
- 2.15 It is acknowledged that Portsmouth cannot meet its housing need and a key role of PfSH has been to consider the capacity of other local authorities in the PfSH area which could contribute to accommodating the unmet need arising from Portsmouth. As acknowledged, Fareham Borough has relatively few constraints compared to its neighbouring authorities, indeed Fareham Borough has been identified as an area which can help to accommodate the unmet need arising from Portsmouth. Paragraph 4.5 of the Publication Plan confirms that Portsmouth City Council have asked Fareham to contribute 1,000 dwellings to their unmet need. It also confirms that there is likely to be an unmet need arising from Gosport and Havant (this is now emphasised in Table 1, if the standard new method were applied). However, Fareham have only included 847 dwellings in the total housing requirement to

contribute to the unmet need of neighbouring authorities. This figure is alone not enough to provide for Portsmouth's unmet need, never mind the other authorities within the PfSH East area. It is evident therefore that the plan is not appropriately planning for unmet need arising from neighbouring authorities and has not been positively prepared in accordance with paragraph 35 a) of the NPPF. It is therefore unsound.

- 2.16 The following table looks at the housing need per annum for all the authorities within the PfSH East area. It sets out the current local plan requirement, the average delivery rate over the last 3 years, the housing figure under the current standard methodology and the housing figures under the proposed new standard method set out in the August 2020 consultation 'Planning for the Future' White Paper. It should again be noted that Fareham Borough Council are using the housing need figure calculated by the proposed new standard method set out in the White Paper, not the current standard method required by the NPPF.

<b>PfSH East</b>	<b>Current Local Plan Requirement</b>	<b>Average Delivery (last 3 years)</b>	<b>Current Standard method</b>	<b>Proposed new standard method (at August 2020)</b>	<b>Change in housing requirement under SM</b>
Portsmouth	547	328	855	730	-125
<b>Fareham</b>	<b>147</b>	<b>310</b>	<b>514</b>	<b>403</b>	<b>-111</b>
Gosport	170	145	238	309	+71
Havant	315	402	504	963	+459
Winchester	625	643	692	1,025	+333
<b>Total</b>	<b>1,804</b>	<b>1,828</b>	<b>2,802</b>	<b>3,430</b>	<b>+628</b>

**Table 1 – Housing need per annum and delivery rates for authorities within PfSH East**

- 2.17 It is also pertinent to note that whilst Fareham has chosen to adopt the draft new Standard Methodology for its own figures, it has not acknowledged the implications arising in terms of the Duty to Co-operate and that there is a significant uplift overall in the housing requirements, including for those authorities potentially already struggling, including Havant and Gosport.

2.18 In Summary:

- No Local Authority in the PfSH East area is currently planning for enough homes to meet their identified need.
- Whilst the housing need as calculated by the proposed new standard method (August 2020) for Portsmouth and Fareham has slightly reduced from the current standard method, the housing need for Gosport, Havant and Winchester has significantly increased. This has resulted in an increase of just over 600 dwellings per annum in the PfSH East area.
- No Local Authority in the PfSH East has been able to deliver their housing need as required by the current standard method in the last 3 years.
- The total housing need in the PfSH East area under the proposed new standard method is far higher than the previously identified housing need.

iii) **Additional Factors affecting Fareham's Housing Numbers**

- 2.19 Table 1 (Housing need per annum and delivery rates for authorities within PfSH East) confirms that no Local Authority in the PfSH East area has been able to deliver their housing need as required by the current standard method in the last 3 years. There could be several explanations for the authorities not meeting their housing need including reliance on large sites not coming forward or delivering at the rate they should, not appropriately planning for the homes they need and the recent Solent nitrate issue could all be contributing factors.
- 2.20 In June 2020, Fareham published their 5 year housing land supply position. At this time, Fareham had a supply of 2.72 years. This supply obviously falls substantially below the government's requirement of a 5 year supply, as set out in Paragraph 73 of the NPPF. After reviewing the housing supply, as set out in the 5 Year Housing Land Supply Report, it is apparent that the Council remains reliant on a few large housing sites coming forward to contribute to the housing land supply in future years.
- 2.21 As such, Fareham Borough Council should look to bolster their supply through the allocation of a range of sites as encouraged by the NPPF.
- 2.22 To be able to meet the increased housing needs in a sustainable manner, and to maintain a 5 year supply of deliverable housing sites across the Plan period, the Council must look to



all tier settlements in the hierarchy to deliver homes through a range of sites. However, it should be noted that strategic sites should not be solely relied on due to lengthy lead in times. Instead, a mix of housing sites should be sought and allocated to enable a 5 year supply to be achieved and maintained.

- 2.23 In addition to bolstering the supply going forward, Fareham need to seek to address the backlog of unmet need. In particular, the South Coast Nitrate crisis put thousands of homes on hold for some time to resolve the eutrophication issues of the Solent to reduce impact on the protected habitats and species. The Nitrate Neutrality Update Report to PfSH Joint Committee (14 October 2019) acknowledged that *“given that there is a severely reduced number of permissions being granted in the PfSH in the financial year 2019/20, it is not unnecessary to assume that the delivery of homes will be suppressed in the years 2020/21 and 2021/22.”*
- 2.24 The submission Local Plan is very conservative in its ambitions for growth in the Borough, especially considering it is under a Duty-to-Cooperate to meet neighbouring authorities’ unmet need. It does not allocate many new sites and instead relies heavily on sites that have been allocated previously. Strategic Policy H1 confirms this, as the provision for 8,389 homes comprises the following:
- 552 homes already with planning permission
  - 4,858 homes on sites with resolution to grant permission (Welborne contributes the large majority of these homes)
- 2.25 Therefore, around 65% of the housing provision already has planning permission or resolution to grant, meaning the Local Plan only allocates sites for approximately 1,750 homes for development over the plan period despite only 2.72 years of housing land supply and a record of under delivery in the Borough. It is of note that nearly 50% of the housing provision is reliant on the Welborne allocation. If this allocation is not to come forward in the plan period due to funding issues, or be significantly delayed, Fareham’s housing provision will be significantly reduced and identified housing needs will not be met. As such, the emerging Local Plan MUST look to allocate further sites accordingly.
- 2.26 Reflecting the above the application of a 15% contingency as shown under Table 4.3 and explained at paragraph 4.12 of the Plan appears woefully inadequate.
-

**iv) Over Reliance on Welborne Garden Village**

- 2.27 Fareham is relying very heavily on one strategic site to deliver almost 50% of its housing provision, namely Welborne Garden Village. Of the supply identified in Table 4.2 relating to Strategic Policy H1, some 4,020 of the overall provision of 8,389 is to come from this one strategic site. This is flawed and potentially undeliverable. Following a resolution to grant planning permission in October 2019 for the outline planning application under Ref: P/17/0266/OA, the Section 106 agreement has still not been signed and therefore planning permission has not yet been issued. According to the Council's website and details held on the outline planning application, a decision is due by 8th January 2021.
- 2.28 The Delivery Report<sup>1</sup> on Welborne Garden City sets out that up to 750 homes will be delivered in the first 5 years. However, this figure appears highly unrealistic and unachievable as set out in more detail below; in addition, the site cannot be developed until funding is secured for Junction 10 of the M27.
- 2.29 On 14 January 2020, Hampshire County Council published an Executive Decision Record on the M27 Junction 10. It confirmed that the progression of work on the Full Business Case is at an impasse, and it is understood that HCC were terminating the role as scheme promoter to avoid abortive work or expenditure, pending resolution of funding and delivery arrangements of the scheme.
- 2.30 The delivery of the Garden City is suggested to be over a 20 year period, with on average 300 dwellings a year being completed. It would be expected higher delivery in early years, lower delivery in later years. As acknowledged, the submission Local Plan relies on approximately 4,000 homes from Welborne coming forward in the plan period.
- 2.31 With regards to the delivery of the site, a key point of note is in the Council's latest 5 year Housing Land Supply (HLS) Position Statement (June 2020). This statement sets out, at paragraph 29, that the site promoter anticipates commencements/completions at Welborne to occur approximately two years later than that set out within the information supporting the

---

<sup>1</sup> Page 83 of the Delivery Document <https://welbornegardenvillage.co.uk/delivery/>

planning application. It is acknowledged that the site promoter has advised the Council of the following anticipated delivery rate:

- 30 dwellings in 2022-23
- 180 dwellings in 2023-24
- 240 dwellings in 2024-25

2.32 The above figures indicate that Welborne can only deliver 450 homes in the next 5 years, up to 2025. This is already a significant drop from the figure set out in the original planning application which was suggesting the delivery of 750 homes within 5 years of commencement. If Welborne can only deliver 450 homes in the next 5 years, it seems an impossible task to deliver the remaining circa 3,550 over the remaining 12 years of the plan period.

2.33 In addition, given the current lack of funding for the access, the anticipated delivery seems highly unlikely and this will have a dramatic effect on Fareham's 5 year HLS and securing its overall housing provision. Therefore, it is considered that relying on one site to deliver a significant number of houses is a high risk strategy. As such, a greater range of sites should be considered.

**v) Affordable Housing**

2.34 Paragraph 4.3 of the draft Local Plan confirms that '*The need for affordable housing in the Borough is based on the number of existing and newly formed households who lack their own housing and cannot afford to meet their housing needs in the market*'. The Council goes on to state that it is confident that it will meet its affordable housing needs through the provision based on its Policy HP5 and it does not need to make any further adjustments to its overall housing figures.

2.35 However, paragraph 5.29 of the draft Local Plan indicates that one of the key issues facing residents in the Borough is the unaffordability of homes to buy or to rent, and that therefore the delivery of homes that are affordable is a priority. The Council's Affordable Housing Strategy 2019 – 2036 (2019), as referenced at paragraph 5.30 of the draft Local Plan, indicates that there is a need for some 3,500 affordable homes up until 2036. It is not clear how the housing number can and will meet the identified affordable housing demand.

2.36 Key concerns include:

- The reliance on the number of houses, including affordable housing, to be delivered by Welborne. The very real concerns over the deliverability of housing from Welborne has already been addressed; the issues identified have a consequential impact on the delivery of affordable housing;
- The heavy reliance in terms of the overall housing provision on windfall sites, many of which are likely to fall under the threshold of 10 or more dwellings and therefore not deliver any affordable housing;
- The reliance on a range of allocated sites (Section 3) which appear to be aspirational rather than realistic and therefore again the impact on the provision of affordable housing.

2.37 The Council fully recognises its substantial affordable housing need across the Borough over the Plan period but it is simply not at all clear that the numbers required can be met under the housing provision being made. It is therefore concluded that the very clear potential that the need for affordable housing in the Borough will not be met leads to a need to increase the overall housing requirement.

vi) **Windfall Allowance**

2.38 Part of the Housing Provision is to be met through unexpected (windfall) development. There is no issue in principle with including an allowance for windfall development, but that figure must be realistic and based on evidence.

2.39 The NPPF defines windfall sites as 'sites not specifically identified in the development plan'. Paragraph 70 of the NPPF sets out that where an allowance for windfall sites is to be made, there should be compelling evidence that they will provide a reliable source of supply, using the strategic housing land availability evidence, historic windfall delivery rates and expected future trends to support such an allowance.

2.40 In this case the Council is relying on 1,224 new homes to come through windfall development out of total of 8,389 new homes. Whilst it is appreciated that the methodology for calculating windfall allowances have changed over time, it is worth noting that in the current adopted Local Plan Part 2: Development Sites and Policies (2015), the average historic windfall

allowance was calculated to be 20 (Appendix F). In the 5 Year Housing Land Supply Position Paper to Planning Committee on 24 June 2020, the Council included a small site windfall allowance of 37 dwellings for each of 2 years (years 4-5).

- 2.41 In the draft Local Plan the reliance on windfall sites has jumped to 1224 which if crudely divided by the length of the Plan period (16 years) gives an annual figure of 76.5. There is no explanation to justify such an over reliance on windfall figures.

### **Conclusions in respect of Strategic Policy H1**

- 2.42 It is clear that there are fundamental concerns over many aspects of the Council's housing provision which have been explored in this Section. There can only be one conclusion that the provision is woefully inadequate and is **UNSOUND**.

### **3.0 Analysis of Housing Allocations**

- 3.1 The Council has allocated and is relying on a number of 'development' sites to assist in the delivery of and in meeting its housing provision. However, the suitability, availability and achievability of several of these sites needs to be questioned and whether they can and will deliver the number of units proposed. It is acknowledged that these sites are not proposed for delivery of housing numbers in the early years of the Plan but it must still be questioned whether there is sufficient confidence that these sites will be brought forward, that they should be included in the plan.
- 3.2 This analysis has only focussed on the medium to larger of the sites, most of them proposing to bring forward in excess of 50 units and there may well be serious issues of suitability, availability and achievability with some of the smaller sites. It is noted that at least 9 of the sites are indicated to make provision for less than 10 units. It is unusual for sites yielding such a small number of units to be included as specific allocations; it begs the question as to whether the Council has needed to bring in such small sites to secure its numbers.
- 3.3 The number of sites where there are serious concerns and questions over their suitability, availability and achievability total at least 6, which in total would provide some 400 – 500 residential units. These sites are addressed below, and the order selected simply follows the order in which they are listed on pages 39 – 40 of the draft Plan and then considered in further detail under site specific policies.

#### **FTC1 Palmerston Car Park (Indicative Dwelling Yield: 20) (SHELAA ref: 3233)**

- 3.4 This is a constrained town centre car park site and the development of housing will be constrained by issues of noise and disturbance from the surrounding roads as well as the service access to the Shopping Centre. The setting of the adjacent Osborn Road Conservation Area to the north will need to be preserved. The Council is keen, under other policies to safeguard and promote Fareham town centre as its principal town centre but there appears to be no co-ordinated car parking strategy to ensure that the loss of existing car parking sites will not compromise those objectives.



- 3.5 At the very minimum the proposal that this site can deliver up to 20 residential units must be questioned; furthermore, there is no confidence that the site is suitable, available and achievable.

**FTC2 Market Quay (Indicative Dwelling Yield: 100)  
(SHELAA ref: 1425)**

- 3.6 This site has been carried forward from the adopted Local Plan Part 2 where it was allocated for some 60 residential units, but has now, without explanation, been increased in the draft Plan to accommodate some 100 units. The site is also expected to deliver approx. 4000 sqm of commercial leisure space together with a new multi storey car park and new town square. The future and viability of town centre strategies may need a comprehensive review in a post Covid era. The site specific requirements also make reference to the possibility of a hotel which presumably, if brought forward, would impact on the achievement of other elements of the proposal, including the residential. There is no indication that there is any real prospect of bringing the site forward over and above aspirational objectives.
- 3.7 At the very minimum the proposal that this site can deliver up to 100 residential units must be questioned; furthermore, there is no confidence that the site is suitable, available and achievable.

**FTC3 Fareham Station East (Indicative Dwelling Yield: 120)  
(SHELAA ref: 0211)**

- 3.8 There are fundamental questions about the suitability and achievability of this site for the intended development. This site has been carried forward from the adopted Local Plan Part 2 where it was allocated for some 90 residential units, but has now, without explanation, been increased in the draft Plan to accommodate some 120 units. Such an ambitious scheme would appear to depend on a comprehensive approach, particularly given the limited access options. Yet, even the SHELAA assessment identifies that the site is in multiple commercial and industrial uses, including railway related uses which brings into question site assembly issues both in terms of achievability and timing.

- 3.9 This is one of the sites where the issue does not simply relate to whether the site can properly accommodate the number of units being proposed, but the suitability availability and achievability must be questioned.

**FTC4: Fareham Station West (Indicative Dwelling Yield: 94)**  
**(SHELAA Ref: 0212)**

- 3.10 This is a long and very narrow site sandwiched between the railway to the east and protected trees to the west. The allocation and the SHELAA recognise the multiple constraints facing this site in terms of bringing it forward for development. These constraints include, amongst others, the multiple uses existing on the site, the access constraints including that the existing access crosses land in Flood Zone 2, noise, contamination and amenity issues.
- 3.11 This is one of the sites where the issue does not simply relate to whether the site can properly accommodate the number of units being proposed, but the suitability availability and achievability must be questioned.

**FTC5: Crofton Conservatories (Indicative Dwelling Yield 49)**  
**SHELAA Ref: 1325**

- 3.12 This site continues to be in active retail use, following the expiry of a temporary permission for retail use and the potential availability of the site is questioned.

**HA7: Warsash Maritime Academy (Indicative Dwelling Yield 100)**  
**SHELAA Ref: 3088**

- 3.13 This site has a long history and has been carried forward from the Local Plan Part 2. The site faces considerable issues in terms of bringing forward a suitable and viable housing development, not least of which is that the western part of the site must be excluded from development because of flooding issues and discussions with Natural England would potentially exclude further land to secure appropriate buffers to sites of international nature conservation significance. As a result, the majority of the development and residential units

would necessarily be brought forward through the conversion of the existing listed buildings on site, potentially impacting on viability.

- 3.14 The site lies in the countryside and is remote from shops and facilities. There are traffic problems along Newton Road which is the only access solution leading to Warsash Centre and up to Park Gate where permission exists for some 800 residential units.
- 3.15 The viability and achievability of this site for some 100 residential units must therefore be questioned.
- 3.16 Due to the ecological and highway issues the Council has determined that any planning application should be submitted with an EIA.

#### **HA13 Hunts Pond Road (Indicative Dwelling Yield 38)**

**SHELAA Ref: 305**

- 3.17 Under the Local Plan Part 2 this site was allocated under Policy DSP53 for Community Uses as part of a larger scheme to include education and open space. It is understood that the site is no longer required by Hampshire County Council for educational purposes, but there is no confirmation that a proper assessment has been undertaken of the continued need of this land for local community uses.

#### **HA4 Downend (Indicative Dwelling Yield 350)**

**SHELAA Ref 3030**

- 3.18 Site HA4 at Downend for some 350 residential units has been the subject of two planning applications both of which were refused against officer recommendation. The first planning application was dismissed at appeal justifying the council's reason for refusal. It is likely the second application which was refused in November 2020 will be appealed however, the committee's stance in terms of determining both applications on this site brings into question whether the council really support this housing allocation. It is therefore questioned whether the Council should be relying on the site as a housing allocation which the Council has found, in the form of the most recent applications, wholly unacceptable.

## **Other Sites**

- 3.19 There are potential constraints with a number of the other sites, which may at the very least delay their delivery or even bring into question their achievability. Site FTC6, Magistrates Court at Fareham and allocated for some 45 units is held up by a complicated deal to resolve the nitrates issue, involving land within Winchester District.

## **Conclusions and Implications Arising**

- 3.20 This analysis demonstrates that there are serious and substantial questions over the suitability, availability and achievability of a number of the allocated sites and whether they will be able to provide the housing figures, either in whole or in part which Fareham is seeking to rely upon. It is therefore contended that it is UNSOUND for Fareham to rely on each and all of these housing sites to deliver all of the dwelling units proposed
- 3.21 This adds to the strength of the argument, as set out under Section 2, that Fareham needs to bring forward additional sites for allocation to help meet its housing need. The next section focuses on why land at Rookery Farm should be included as a housing allocation in the Local Plan.

#### **4.0 Rookery Farm**

- 4.1 It is clear from Sections 2.0 and 3.0 that not only has Fareham under provided on the housing figures it requires to meet over the Local Plan period, but it is very unlikely that it will be able to deliver even the numbers it is proposing to provide. Fareham therefore needs to allocate further housing sites to improve housing deliverability; Rookery Farm should be allocated as a housing site. This was allocated in the draft Reg 18 Supplement in early 2020 under the Policy Reference HAX (SHELAA ref: 0046).

##### **Site Location**

- 4.2 The site is located immediately north of the M27 Motorway and west of Whiteley. Access is from Botley Road approximately 100m north of the bridge over the Motorway. Please see attached site plan showing the land forming part of the proposed development area. It is estimated at this early stage that the site could accommodate in the region of 150-200 residential units including an element of affordable housing and a mix of housing types to accord with Fareham's policies and approach to housing mix.
- 4.3 146 Botley Road (also known as Rookery Farm) lies to the north of the land and is in separate private ownership. The dwelling is listed. Residential development along Swanwick Lane lies further to the north.
- 4.4 The residential development of Whiteley is to the east. To the south are the local centre at Park Gate and the railway station at Swanwick, both within easy walking distance of the site.
- 4.5 Rookery Avenue is opposite the access to the site. At present this is a cul de sac however there is a safeguarded road extension to continue Rookery Avenue into Whiteley, linking Botley Road to the Parkway South roundabout.
- 4.6 To the south of the site is a vehicular and pedestrian bridge that provides access to residential properties at Bridge Road.

## **The Site**

- 4.7 The site as a whole occupies approximately 20.05 Ha of land accessed from Botley Road just to the north of the M27 Motorway. The front part of the site is visible from Botley Road however the access road, which is between an earth bund to the north and embankment to the south, drops to a lower central area where aggregate recycling has, until recently, taken place.
- 4.8 Adjacent to the motorway is a large embankment created by historic land raising. The central part of the site comprises a relatively flat operational area where recycling materials have been stockpiled. To the north is the Orchard where the land gradually drops towards the rear of properties fronting onto Swanwick Lane.
- 4.9 At present due to the change in levels and the surrounding housing only the front part of the site adjacent to Botley Road is visible from outside the site.
- 4.10 The site at present has two principal landowners Raymond Brown Rookery Properties Ltd and Prospective Estates Ltd, with Raymond Brown acting on their behalf

## **Site Planning History**

- 4.11 Rookery Farm was originally a fruit farm and some evidence of this former use is still evident in an area of remnant orchard to the north-west of the site. Part of the site adjacent to the M27 has been land raised and restored to grazing land. This forms a large embankment which screens the central part of the site from the M27 and Botley Road.
- 4.12 Planning permission was first granted on appeal in 1987 (APP/Z1700/A/55/049143) for the infilling of agricultural land with c.1.3 million cubic metres of construction and demolition wastes with restoration to agricultural use. Tipping commenced in 1988 and temporary planning permission for waste recovery (recycling) was granted in 1995.
- 4.13 A further temporary planning permission for the inert waste recycling operation was granted in 2006 (P/06/0443/CC), time limited to expire in 2021. This permission introduced an expiry date for land raising operations of 31st December 2026.



- 4.14 In 2014, planning permission (P/14/0857/CC) was granted for the permanent retention of the aggregate recycling facility. In 2016 (P/15/1213/CC) and 2018 (P/18/0978/CC) planning permission was granted which, in effect, extended the validity of the development pursuant to planning permission P/14/0857/CC until 25 October 2020. This date has also since been extended by way of The Business and Planning Act 2020 to 1 May 2021.
- 4.15 Details pursuant to the remaining pre-commencement conditions are to be submitted to Hampshire County Council for approval in January 2021. Following discharge of these conditions and implementation of the permission, conditions relating to restoration associated with the earlier land raising permissions fall away leaving just the permanent recycling use. The site will subsequently, in planning terms, predominately formally become previously developed (brownfield) land.
- 4.16 Note there have been no minerals operations at the site and any changes to the landscape are as a result of land raising, not from extraction activities.
- 4.17 The main body of the site is currently safeguarded for aggregates recycling in the Hampshire Minerals & Waste Plan. Hampshire County Council have indicated that there is overcapacity for inert waste recycling at present. As such if the site was to be allocated for housing then the safeguarding status would be reviewed.
- 4.18 It should be noted that in its comments on the draft Plan 2020 (Regulation 18 Draft Local Plan 2036 Supplement) when the site was allocated for residential development, Hampshire County Council as Minerals and Waste Authority advised:

*Hampshire County Council has concluded that sufficient aggregate recycling capacity is currently in place to deal with the additional waste and as such no objection to this allocation will be raised*

### **Site Appraisal**

- 4.19 It is noted that the site was found to be a developable housing site within the Fareham Local Plan 2036 Strategic Housing and Employment Land Availability Assessment (SHELAA) December 2019, but subsequently discounted as unsuitable in the Fareham Local Plan 2037

Strategic Housing and Employment Land Availability Assessment (SHELAA) September 2020.

- 4.20 In considering the site developable, the SHELAA (2019) makes the following comments regarding suitability of the site:

*‘Overall suitable for housing development. Further work required to ascertain an appropriate development structure and net developable areas, having regard to site ground conditions, drainage, habitat surveys, movement connections and retention of existing cover of woodlands, trees and hedgerows. Eastern part of site has good pedestrian accessibility to existing local services. Potential scope to include a small convenience store to improve sustainability of main core of the site. Suitable highways improvements required, with linkages to surrounding movement networks. Potential impact of noise and air quality to be assessed and appropriately mitigated’.*

- 4.21 In subsequently discounting the site, the SHELAA (2020) makes the following comment regarding reason for discounting the site as un-developable:

*‘Site topography and boundary likely to create isolated cul de sac development. Main developable area of the site is not well related to existing settlement and is relatively isolated from local services’.*

- 4.22 The reasoning behind the change in conclusion reached by the SHELAA (2020) is unclear as there has been no substantive change in circumstances or new information related to the site not previously provided to the Local Planning Authority. Furthermore, the SHELAA (2020) attributes the same 8 out of 10 score for accessibility to facilities from the site as the SHELAA (2019), recognising the inherently sustainable location adjacent the urban area of Swanwick, the proximity to Swanwick Railway Station and nearby shops/amenities. As identified in the SHELAA (2019) suitability summary, if necessary, sustainability of the main core of the site could further be improved via development of a small convenience store in-situ.

- 4.23 Paragraph 4.28 of the SHELAA (2020) states that *‘the information from the SHELAA forms an important part of the evidence base for the Local Plan 2037, providing a source of developable sites which are suitable for future development needs, available within the plan*

*period and viably achievable. Developable sites which can be brought forward under the Council's development strategy will contribute to the housing and employment supply for the Local Plan 2037...*

4.24 Paragraph 3.21 of the Publication Version of the Fareham Local Plan 2037 states:

'3.21 The development strategy proposed by the Local Plan includes:

*...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'.*

4.25 As the site should be considered to be previously developed/brownfield land, it is sequentially preferable for development based on the Council's Local Plan development strategy. Furthermore, paragraph 4.18 (Assessing Site Suitability) of the SHELAA (2020) states that 'sites outside the urban area will not necessarily be excluded as they could be considered alongside a review of urban area boundaries as part of Local Plan development...'.

4.26 Paragraph 3.3 of the Background Paper: Settlement Boundary Review (September 2020) states that 'the reasons for establishing settlement boundaries include:

- *Directing development to more sustainable locations in terms of accessibility and proximity to public transport, and in terms of being well served by existing essential services and facilities'....*
- *'To assist in urban regeneration, by encouraging the re-use of brownfield land'.*

4.27 Considering the proximity of the existing Settlement Boundary to the site (approximately seven metres distance on the opposite (eastern) side of Botley Road), Rookery Farm site would represent an entirely reasonable and logical extension to the established urban area which would be in accordance with the development strategy contained within the Local Plan.

4.28 Cul de sac type development formats are well established and entirely functional residential layout present in the vicinity of the site. Such a development format would therefore reflect the prevailing development pattern and design vernacular and be sympathetic to existing

communities. Indeed a number of the sites put forward in the current draft plan would potentially result in cul de sac developments, including:

FTC3 – Fareham Station (120 dwellings)

FTC4 – Fareham Station West (90 dwellings)

HA3 Southampton Road (348 dwellings)

HA4 Downend Road (350 dwellings)

- 4.29 The site presently benefits from permanent planning permission for development and use for aggregate recycling. This is significant in terms of both vehicle movements and future development potential. Current planning permissions contain conditions limiting HGV movements to 240 per day, all of which utilise the current site access point on Botley Road. These authorised HGV movements would be replaced by domestic vehicle movements, substantially mitigating any perceived increase in road traffic on Botley Road. In addition, the imminent completion of the North Whiteley Link Road is anticipated to reduce vehicle movements on Botley Road. Without wanting to pre-empt the outcome of any Transport Feasibility Assessment, development of the site could also facilitate the development of the western end of the Rookery Avenue extension as there is space within the site to accommodate a roundabout.
- 4.30 Planning permission P/18/0978/CC includes for considerable earthworks to create extended and raised bunding to re-model the site and mitigate against noise impacts from the recycling use. A significant proportion of this re-modelling is on the south western boundary of the site. Such earthworks would be very similar in scale and form to those likely to be required to reduce noise levels from motorway traffic to appropriate levels for inhabitants of any future residential development on the site.
- 4.31 The Council has previously been furnished with a Phase 1 Contaminated Land Assessment and Slope Stability Assessment for the site, identifying that the embankment/land raise slope adjacent to the M27 is stable and that the site could be suitable for re-development in accordance with the indicative masterplan previously submitted.
- 4.32 Any future development scheme pursuant to an allocation would also include mitigation to address potential air quality concerns associated with proximity to the motorway. Such

issues can be effectively managed through building design and layout amongst other techniques.

4.33 The site comprises circa 20 hectares of land with a net developable area of circa 10 hectares. Significant land is therefore available within the land ownership for biodiversity enhancement, on-site nitrate mitigation and dedication to public open space.

4.34 The following points detail the benefits of residential development on the Rookery Farm site:

- Once the permanent recycling permission is implemented the site will become previously development land/brownfield and its development will reduce the need for more sensitive (greenfield) sites within the Borough;
- The site is in a highly sustainable location in proximity to a railway station and amenities, is deliverable and would provide necessary housing capacity within the Plan;
- It should be noted that in its response to the draft 2020 Plan (Regulation 18 Draft Local Plan 2036 Supplement) showing the inclusion of Rookery Farm, the County Council responded as follows:

*This allocation is close to Swanwick railway station. The County Council supports the opportunity for this site to provide high quality walking and cycling routes to Swanwick station. This may include a new active modes bridge over the motorway and enhanced interchange at Swanwick Station with new local bus services. The development brief also needs to include provision for off-site improvements to address the inadequate bus, walking and cycling connections to the Segensworth business parks.*

- Provision of Public Open Space on a former land raise site and access to it from existing footpath routes;
- Removal of a 'heavy industry' use from an otherwise residential setting;
- Would facilitate the Rookery Avenue extension. This would provide better access to the motorway, the industrial area of Whiteley and Whiteley District Centre;
- Opens up pedestrian links across the motorway to Addison Road;
- The site would not be visually prominent and would form a logical urban extension. Development could enable biodiversity enhancements associated with long-term habitat management plans and the re-instatement of a pre-existing stream across the site;
- The development would be offset by the loss of 240 HGV vehicle movements a day.

- 4.35 Were recycling operations to cease and land raising be completed, circa one million tonnes of waste material would need to be imported to the site before planning permission expiry in December 2026. This will impact the surrounding ambient environment through noise, dust and exhaust/plant emissions associated with operations and significant numbers of HGV movements.
- 4.36 Resumption and completion of land raising would also result in the site and location becoming permanently sterilised for future development. This is therefore a unique opportunity to re-develop the site to meet a real and urgent need to provide homes in the Borough.



## 5.0 **Modifications Required to the Plan to Make it Sound**

- 5.1. There is no need to revisit the arguments and issues which have been set out at length in the earlier sections and which demonstrate that the Plan as drafted is UNSOUND. The modifications required are set out below in bullet form. It will be immediately clear that the required work to ensure that the Plan is SOUND extends well beyond detailed amendments to drafted policy wording; a fundamental review of the Plan and the basis upon which it has been prepared is required.
- 5.2. The revised approach to the preparation of the Plan, with consequential implications for the redrafting of **Strategic Policy H1**, requires:
- a) A thorough reassessment of the Housing numbers using the Standard Method as set out under the PPG; it is premature to use the draft new Standard Method which Government has now formally abandoned. The only reason it has been used by Fareham is because it appears to provide a lower number of units required. This is clearly UNSOUND and for the plan to made SOUND, the current Standard Method must be re-used and those sites proposed for allocation in the Local Plan Supplement be included.
  - b) The Duty to Co-operate has not been undertaken properly and thoroughly; Fareham has underprovided in terms of meeting the needs of the adjoining authorities who are struggling to meet their housing needs, including Portsmouth, Gosport and Havant all of which are geographically very constrained. The exercise needs to be undertaken again to ensure that Fareham properly plans to accommodate the needs arising from surrounding authorities. It is worth noting that the under provision is made even worse if account were to be taken of the draft new Standard Methodology where the housing requirements of adjoining constrained authorities is increased; Fareham appears to have decided to ignore this implication arising from the new draft Standard Method.
  - c) The Council has a history of under delivery of housing figures and its 5 year housing land supply figure currently stands at under 3 years. On the basis that the NPPF and PPG are both clear that the housing provision numbers should be regarded as

minimum, and reflecting the above position, Fareham requires to be considerably more ambitious in terms of its overall housing provision figures.

- d) There is a very concerning over reliance on the achievability of so much of the housing provision from one site, namely Welborne Garden Village. This is even more of a significant issue given the fundamental difficulties that appear to be encountered over the funding and provision of the new motorway junction which is fundamental to the progress of the overall development. The amount of reliance that can properly be placed on the delivery of housing numbers from this one development needs to be reviewed and significantly reduced.
- e) There is also a potential over reliance on windfalls to deliver a significant proportion of the overall housing figures; this requires to be revisited with a downward adjustment.
- f) The Council is in very real danger of not being able to meet its affordable housing requirements, given all the constraints identified. The housing numbers and potential affordable housing provision requires to be recalculated with the need to increase the overall housing numbers if the affordable housing needs are to be met.

5.3 In addition to the above the Council also requires to re-address a number of its allocated housing sites, including at the very minimum **Sites FTC1, FTC2, FTC3, FTC4, FTC5, HA7 and HA13**. This reassessment in terms of suitability, achievability and availability is likely to reduce substantially the number of new dwelling units that can be achieved from these allocations.

5.4 The Council is clearly underproviding in terms of its overall housing numbers and the reliance it is placing on sites that face constraints and may not be achievable. The Council needs to make further allocations, and this should include Land at Rookery Farm which is suitable, available and achievable and subject to planning, deliverable within a 5 year period. The site has been considered suitable, available and achievable and was allocated in the Local Plan Supplement; the principal reason why it no longer appears as an allocation is because of the Council's unsound change in the methodology it is applying to calculate its housing numbers. **Rookery Farm should be reinstated as a housing allocation.**

- 5.5 It follows that the Plan cannot be made SOUND without a fundamental review of the main elements of the housing figures, including methodology and will require additional sites to be allocated; Rookery Farm should be included as an allocation in the Plan, being suitable, available and achievable and, indeed, deliverable.





**Appendix 3 and 4 submitted separately**





## Phase I Environmental Site Assessment

Rookery Farm, Botley Road, Swanwick, Hampshire,  
SO31 1BL

289128.0001.0000

November 2017

### **Prepared For:**

Raymond Brown Minerals and Recycling Limited



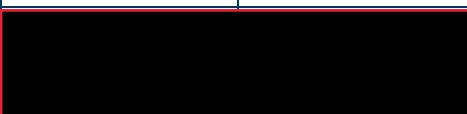
### **Prepared By:**

TRC Companies Limited

Registered office: 150 Minories, London EC3N 1LS | Company number: 06749633

## Quality Control

Client Name:	Raymond Brown Minerals and Recycling Limited
Project Name:	Rookery Farm
Project No.:	289128.0000.0000
Document Title:	Phase I Environmental Site Assessment
Date:	November 2017

Version:	Draft	Final		
Prepared by:				
	A Sokolowski	A Sokolowski		
Reviewed by:				
	S Nichols	S Nichols		
Approved by:				
	A Sokolowski	A Sokolowski		

# Table of Contents

<b>Executive Summary .....</b>	<b>2</b>
<b>1.0 Introduction .....</b>	<b>2</b>
1.1 Purpose.....	2
1.2 Proposed Development .....	2
1.3 Scope of Services .....	2
1.4 Significant Assumptions .....	2
1.5 User Reliance .....	3
<b>2.0 Site Description .....</b>	<b>3</b>
2.1 Overview.....	3
2.2 Subject and Surrounding Area.....	3
2.3 Current Use and Ownership of the Subject Site.....	3
2.4 Existing Structures and Roads on the Subject Site .....	3
<b>3.0 Review of Publicly Accessible Information.....</b>	<b>5</b>
3.1 Environmental Setting .....	5
3.2 Environmental Regulatory Database Review .....	6
3.3 History of the Site and the Surrounding Area.....	8
3.4 Previous Environmental Assessments, Investigations or Remediation .....	11
<b>4.0 Site Reconnaissance.....</b>	<b>13</b>
4.1 Methodology and Limiting Conditions .....	13
4.2 General Site Setting and Observations .....	13
4.3 Environmental Management .....	14
4.4 Hazardous Substances and Petroleum Products Storage.....	14
4.4 Underground Storage Tanks (UST) .....	14
4.5 Waste Management.....	14
4.5 Water and Wastewater .....	14
4.6 Evidence of Spills, Staining or Corrosion on Floors or in External Areas.....	15
4.7 Non-Natural Mounds or Depressions, Excavations and Fill .....	15
4.8 Asbestos Containing Materials (ACM) .....	15
4.9 Polychlorinated Biphenyls (PCB) .....	15
4.10 Ozone Depleting Substances (ODS).....	15
4.11 Radioactive Materials .....	15
4.12 Invasive Species .....	15
4.10 Summary of Site Walkover Observations .....	15
<b>5.0 Preliminary Environmental Risk Assessment.....</b>	<b>17</b>
5.1 Conceptual Site Model .....	17
5.2 Inputs.....	17
5.3 Conceptual Site Model .....	18
5.4 Other Property Related Environmental Issues .....	21
<b>6.0 Conclusions .....</b>	<b>22</b>
6.1 Findings.....	22
6.2 Summary of Environmental Risk .....	22
5.3 Recommendations .....	22

---

## **Table of Contents: Annexes**

**Annex A: Figures**

**Annex B: Envirocheck Report**

**Annex C: Photographic Records**

## Executive Summary

TRC Companies Limited (TRC) was commissioned by Raymond Brown Minerals and Recycling Limited (the 'Client') to undertake a Phase I Environmental Site Assessment (ESA) for their property located at Rookery Farm, Botley Road, Swanwick, Hampshire, SO31 1BL (hereafter referred to as the 'Site').

This Phase I ESA has been commissioned to highlight environmental considerations, predominantly with respect to ground conditions at the Site, which will be used to support future planning applications for the proposed development. The proposed redevelopment comprises residential end use across the area currently occupied by aggregate recycling operations, whilst the former landfill area will be designated as open public land.

The Site is approximately 20 ha in area and comprises an inert waste washing plant and former inert landfill. The Site is centred on National Grid Reference 451290, 109180. It is located approximately 300m northwest of Swanwick train station within a triangle of land formed by the M27, Botley Road (A3051) and Swanwick Lane. The Site is accessed off Botley Road.

The Site was acquired by the Client in 1999 and comprises the following land uses:

- **Aggregates Recycling** - the aggregates recycling operations are located in the northern part of the Site and comprise crushing and screening of imported inert construction derived materials. At the time of writing, the aggregates washing plant is undergoing decommissioning and removal from Site and should be fully removed by the end of 2017. The Site is permitted to handle 140,000 tonnes per annum, but is currently operating at approximately half that volume.
- **Restored Landfill** – the southern half of the Site contains a restored inert landfill. The landfill was first permitted in the early 1980's, but is now closed and fully restored. The landfill is a land raise type construction with steep sides and an upper surface that is approximately 10-14m above the operational area. The Client reports that the landfill received approximately 1 million tonnes of inert waste during its operation.

Prior to the current land use, the Site was owned by Rookery Farm and used for agricultural purposes which were primarily orchard use.

TRC consider that the environmental setting is of low to moderate sensitivity. The underlying geology comprises London Clay from near surface, which is classified by the Environment Agency (EA) as Unproductive Strata. The Site is not located within an EA designated Source Protection Zone and there are no potable groundwater abstraction consents recorded within a 500m radius. There are surface water ponds on the eastern and western boundary and a culverted drainage ditch/stream running through the Site.

TRC considers the operational area of the Site to be generally low risk with respect to contaminated land liability. The Site is situated on London Clay Formation from near surface and the operations appear to have limited potential for contaminant release. Use of hydrocarbon fuels, oils and grease is limited to plant fuelling and maintenance operations and has limited potential for site wide release.

TRC consider that potential risks to the proposed development will be mitigated through the development design features such as placement of capping in gardens and landscaping (currently required for growing medium) and the presence of hardstanding in building footprints and highways. Ground gas mitigation could also be engineered into the building design if required.

The landfill was operated as an inert landfill and is fully restored. Environmental data show no significant contamination within the leachate and no significant concentrations of ground gas. There are noted hotspots of ground gas at monitoring locations within the centre of the landfill mass.

Potential for leachate and ground gas migration is limited given that the landfill is situated on London Clay and raised above ground. Leachate is managed through drainage, which is fenced and isolated from

unauthorised persons. Any future development surrounding the landfill should appraise and consider potential ground gas risks to ensure that appropriate mitigation measures are incorporated into the development design.

The landfill slopes are steep and well vegetated. Slope failure has been observed in the past (early 2000s) and the Client has commissioned specialist engineers to undertake assessments and remedial work. There is an ongoing programme of routine inspections.

Future development should consider and mitigate risks of slope instability and potential impact to the proposed development. The development design should consider the distance of proposed properties from the slopes and potential slope hazard. The development design should incorporate detailed methodologies and design for slope engineering to stabilise and mitigate future risk of movement. Likely engineering solutions would include re-engineering of slopes to reduce slope angles and / or vegetation based stabilisation, reinforced soil structures, piling or retaining walls.

Proposed open public land use on the restored landfill presents no significant contaminant linkage. The restoration observed at the property includes capping and segregation layers. Drainage channels that may contain leachate are fenced and isolated from third parties thereby removing potential risk pathways.

This Executive Summary is part of this complete report; any findings, opinions, or conclusions in this Executive Summary are made in context with the complete report. TRC recommends that the user reads the entire report for all supporting information related to findings, opinions, and conclusions.



## 1.0 Introduction

### 1.1 Purpose

TRC Companies Limited (TRC) was commissioned by Raymond Brown Minerals and Recycling Limited (the 'Client') to undertake a Phase I Environmental Site Assessment (ESA) for their property located at Rookery Farm, Botley Road, Swanwick, Hampshire, SO31 1BL (hereafter referred to as the 'Site').

This Phase I ESA has been commissioned to assess the environmental condition of the property, predominantly with respect to ground conditions at the Site. The purpose of this assessment is to evaluate potential environmental constraints that may affect development proposals for a predominantly residential end use.

The Site location plan is presented as Figure 1 in Annex A.

### 1.2 Proposed Development

It is understood that the Client is promoting the Site for inclusion within the Fareham Borough Council (FBC) local plan. The redevelopment proposals comprise the redevelopment of the existing operational area of the Site for residential purposes comprising 250 dwellings with public open space on the former landfill area.

### 1.3 Scope of Services

This report presents the findings of an assessment based on the following information:

- Desk based assessment of historical uses of the Site and surroundings;
- Evaluation of current use and condition of the Site through site walkover and interviews with key site staff;
- Desk based assessment of environmental setting in terms of geology, hydrogeology, hydrology and surrounding land uses;
- Review of relevant publically available environmental records.

The Environmental Desk Study assessment was conducted with due regard to the following guidance:

- The National Planning Policy Framework.
- BS5930 (2015) Code of Practice for Ground Investigations; and,
- BS1075 (2013) Investigation of Potentially Contaminated Sites – Code of Practice;
- Contaminated Land Report (CLR) 11 Model Procedures for the Management of Land Contamination

### 1.4 Significant Assumptions

This report presents TRC's observations, findings, and conclusions as they existed on the date that this report was issued. This report is subject to modification if TRC becomes aware of additional information after the date of this report that is material to its findings and conclusions.

The reliability of information provided by others to TRC cannot be guaranteed to be accurate or complete. Performance of this Phase I ESA is intended to reduce, but not eliminate, uncertainty of environmental conditions associated with the subject site; therefore, the findings and conclusions made in this report should not be construed to warrant or guarantee the subject site, or express or imply, including without limitation, warranties as to its marketability for a particular use. TRC found no reason to question the validity of information received unless explicitly noted elsewhere in this report.

### **1.5 User Reliance**

This report was prepared for Raymond Brown Minerals and Recycling Limited. Reliance on the Report by any other third party is subject to requesting and fully executing a reliance letter between TRC and the third party that acknowledges the TRC Standard Terms and Conditions with the Client, to the same extent as if they were the Client thereunder.

TRC has been provided with information from third parties for information purposes only and without representation or warranty, express or implied as to its accuracy or completeness and without any liability on such third parties part to revise or update the information. Where reliance has been provided by third parties to potential purchasers this is noted in our report.

## 2.0 Site Description

### 2.1 Overview

The Site is located at Rookery Farm, Botley Road, Swanwick, Hampshire, SO31 1BL.

The Site location is presented as Figure 1 in Annex A.

### 2.2 Subject and Surrounding Area

The Site is approximately 20 ha in area and comprises an inert waste washing plant and former inert landfill. The Site is centred on National Grid Reference 451290, 109180. It is located approximately 300m northwest of Swanwick train station within a triangle of land formed by the M27, Botley Road (A3051) and Swanwick Lane. The Site is accessed off Botley Road.

The Site is located in an area of countryside as defined in the adopted local plan. Land uses in the immediate vicinity include the following:

**Table 1: Summary of Surrounding Land Use**

Direction	Land Use
North	The Site is bound to the north by paddocks, rear gardens and residential properties along Swanwick Lane.
East	The Site is bound to the east by Botley Road and residential properties beyond.
South	The Site is bound to the south by the M27 motorway.
West	The Site is bound to the west by areas of undeveloped countryside land and the M27 motorway beyond.

The Site has an average elevation of approximately 40m above Ordnance Datum (aOD) within the operational area and 45-50m AOD on the raised landfill area.

### 2.3 Current Use and Ownership of the Subject Site

The Site currently comprises an operational aggregates recycling facility and closed inert landfill. It is owned by the Client.

The Site is accessed off Botley Road. The haul road leads to an entrance area comprising the site offices, welfare and weighbridge office, weighbridge and staff car parking. The operational aggregates recycling facility is located down the haul road within a topographic bowl formed by the restored landfill to the south and an environmental screening bund to the north.

The aggregates recycling operation comprises import, crushing and screening of waste construction derived materials and export of recycled aggregate. The aggregates washing plant is no longer operational and undergoing decommissioning and removal from Site.

### 2.4 Existing Structures and Roads on the Subject Site

The Site is accessed via Botley Road. The main haul road runs down to the operational area via the weighbridge. Traffic within the operational area is directed in a circular hauling route to facilitate safe tipping and collection of materials.

There is a secondary access point located on the southern boundary beyond the landfill. This facilitates access to the Site from land to the south beyond the railway and motorway via a dedicated bridge. It is understood that this may have been part of a western relief road. The Client reported that this access was sealed to prevent unauthorised access.

There are unsealed tracks leading to the upper section of the restored landfill. These routes appear informal and accessible by four wheel drive or tracked vehicles only.

The site offices and welfare are the only occupied buildings at the Site. These are portacabin / container style units. Two storage containers are located within the operational area.

The aggregates washing plant is located in the centre of the operational area of the Site and is undergoing decommissioning and removal from Site.

There are no other structures identified on the Site.

## 3.0 Review of Publicly Accessible Information

### 3.1 Environmental Setting

The environmental setting of the Site can influence the susceptibility to, and relative magnitude of, environmental impacts and liabilities associated with on and off-site sources of contamination. The following section presents a summary of environmental reviews conducted via publically available records.

#### 3.1.1 Geology and Hydrogeology

British Geological Survey (BGS) geological mapping and Environment Agency (EA) hydrogeological mapping indicate the following geological progression beneath the Site:

**Table 2: Summary of Geology and Hydrogeology**

Geology	Geology Description	Aquifer Status	Aquifer Description
London Clay Formation	Clay	Unproductive Strata	These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow.

There are no published borehole records within the Site area. However, there are numerous record entries in close proximity, particularly along the southern boundary where borehole records are held for the M27 motorway. These records show that London Clay is present from the surface, but the clay thickness was not proven.

The database hold one deep borehole record dated for a Site located approximately 250m south of the southern Site boundary. The borehole, drilled in 1904, proved that the London Clay was approximately 112ft (circa 34m) thick, underlain by Reading Beds (defined by BGS as an interleaved red and variegated clays and sands). The Reading Beds had a proven thickness of 113ft (circa 34m) and were in turn underlain by Upper Chalk (thickness unproven).

The database indicates that there is one groundwater abstraction located within a 500m radius of the Site. The consent is for the abstraction of groundwater from a single location for horticultural uses. The permit is held for a site located 398m north of the Site.

The Environment Agency website indicates that the Site is not located within a groundwater Source Protection Zone.

#### 3.1.2 Coal Mining

The database indicates that the Site is not within an area affected by coal mining.

#### 3.1.3 Radon

BGS records indicate that the Site is located within a low probability radon area, as less than 1% of homes are above the action level. On this basis, the BGS states that “no radon protective measures are necessary in the construction of new dwellings or extensions”.

#### 3.1.4 Hydrology

Historical mapping records show that the Site drains to the west to the River Hamble approximately 1.5km west of the Site. Prior to the current land use a stream previously flowed from the approximate location of Rookery Farm across the Site in an east to west orientation.

Mapping records and Client provided information confirmed that the stream has been culverted and flows beneath the operational area of the Site from a pond just off the north-eastern boundary with Rookery Farm to a settling pond located on the western boundary. The Client reported that this pond is designed to overflow to a secondary holding pond and culvert beneath the M27 motorway. The Client noted that the pond has never flooded.

TRC note that aerial images for the Site show a small pond in the centre of the Site located in close proximity to the washing plant. The Client noted that this is a holding pond and hydraulically isolated from surrounding ground and culverts.

The EA records indicate that the Site is in Flood Zone 1 and has a low probability of flooding.

No surface water abstractions are identified within a 500m radius of the Site.

### 3.1.5 Sensitive Land Uses

The Site is located within a mixed light industrial, commercial and agricultural land use area. Environmental database records indicate that the Site lies within the Hamble Estuary Eutrophic Nitrate Vulnerable Zone (NVZ).

### 3.1.6 Summary of Site Sensitivity

The Site is considered to be of low to moderate environmental sensitivity, based on the following key factors:

- The published geology indicates that the Site immediately overlies the low permeability strata of the London Clay Formation.
- The EA has classified the London Clay Formation as an Unproductive Strata. The Site is not located within an EA designated Source Protection Zone (SPZ) and there are no potable water groundwater abstraction consents recorded within a 500m radius.
- Surface water features at the Site comprise ponds on the east and western boundaries and a culverted stream, which links the two features.
- The Site lies within a NVZ.

## 3.2 Environmental Regulatory Database Review

The following environmental data has been obtained from a Landmark Envirocheck Report (Annex B), which includes a search of databases held by regulatory bodies including the EA, BGS, the Department for the Environment, Food and Rural Affairs (DEFRA), City, District and Borough Councils and County Councils. The table below summarises key features identified on-site and within the 500m search radius.

**Table 3: Summary of Environmental Regulatory Database Review**

Database	On-site	0-500m	Description
Contaminated land register entries	0	0	Not applicable (N/A)
Current registered landfills	1	1	Database records are held for the closed landfill present at the Site. It is noted that the landfill extends to the north of Site beyond the staff car park area near to the weighbridge. The Client confirmed that this former landfill area was outside of their area of ownership.  Further details of the landfill are presented below this table.
Closed landfills	0	0	N/A



Database	On-site	0-500m	Description
Current registered waste transfer/ treatment facilities	1	1	<p>The database shows the following landfill and physical treatment facilities licences held by the Client for the Site.</p> <p>The database shows a dry cleaning facility located 348m southeast of the Site. The permit (ref: PG6/46) is held by Pressing Needs Limited.</p>
Closed waste transfer/ treatment facilities	0	0	N/A
Authorised industrial processes	1	0	The database entries note a permit held by the Client for co-incineration of hazardous waste (ref: MP3239BR, dated 9 <sup>th</sup> November 2015). The database shows that this was superseded by variation.
Licensed radioactive substances	0	0	N/A
Enforcements, prohibitions or prosecutions	0	0	N/A
Active Discharge consents	0	8	There are eight entries for discharge consents. The nearest consent is for a domestic site located 108m east. The consent is for a soakaway.
Pollution incidents	0	7	<p>The database records the following pollution incidents in the locality of the Site:</p> <ul style="list-style-type: none"> <li>• Location 155m southeast – minor incident involving general biodegradable pollutant. Incident date 23<sup>rd</sup> April 1999;</li> <li>• Location 157m southwest – significant incident involving crude sewage including stream discolouration. Note relates to landfill/waste disposal site, but no further details provided. Incident date 11<sup>th</sup> October 1994;</li> <li>• Location 194m northeast – significant incident at Rookery Farm involving gas oil on pond and dead fish. Incident dates 16<sup>th</sup> September 1993;</li> <li>• Location 325m northeast – minor incident involving petrol on surface of water. Incident dated 1<sup>st</sup> October 1993;</li> <li>• Location 370m west – minor incident involving crude sewage. Incident date 26<sup>th</sup> September 1994;</li> <li>• Location 372m west – minor incident involving a foul sewer failure and release of crude sewage and sewerage material. Incident dated 16<sup>th</sup> September 1999;</li> <li>• Location 448m west – significant incident involving crude sewage from a blocked sewer. Incident dated 1<sup>st</sup> November 1995.</li> </ul>

### 3.2.1 Landfill Permitting

As noted in Table 3 above, there is a closed inert landfill at the Site. The landfill covers the southern half of the property and extends to the north of the Site on land adjacent to the Site entrance, staff car parking and weighbridge.

The Client provided anecdotal information that noted that the owner of Rookery Farm was granted approval to establish the landfill around the time that the M27 was constructed. The records of landfill permits are summarised below:

The database records that the first landfill licence was held by J&W Landfill Limited (Ref: 10/30A) and was dated 16<sup>th</sup> November 1984. The licence details show that authorised wastes included construction and demolition wastes, excavated natural materials, foundry sand, road making materials, sands and silica. Prohibited wastes included biodegradable/putrescible waste, contaminated rubble, food waste, liquid/slurry/sludge, paper and cardboard, phenols, analogues/derivatives, poisonous, noxious, polluting wastes, special wastes and vegetable/processing waste.

The database shows that the above permit was superseded by permit reference 10/32, which was held by Leigh Environmental (Southern) Limited, dated 7<sup>th</sup> April 1988. This permit authorised disposal of inert wastes comprising construction and demolition wastes, highways maintenance wastes, sand, chalk, gravel and naturally occurring earth spoils. The schedule of prohibited wastes is similar to the above excluding degradable and contaminated materials and all fibrous forms of asbestos.

The database shows that the current operating permit reference FA 032A superseded the above on 11<sup>th</sup> May 1995 and is held by Raymond Brown Eco Bio Limited. In addition to the aforementioned approved wastes, this licence authorises the disposal of adhesive wastes, cork, cull, clays, pottery, china, enamels, ceramics, ebonite, kapok, kieselguhr, electrical fittings and fixtures, ferrous and non-ferrous metals, Hampshire Category A inert waste for recycling, natural manmade fibres, products of completed polymerisation, shot blast, boiler scale, iron oxide, hydrox and solid rubber. The prohibited wastes are generally as per previous licences and include degradable and contaminated materials.

## 3.3 History of the Site and the Surrounding Area

The history of development on the Site and immediate surrounding area was investigated with reference to historical Ordnance Survey (OS) mapping and aerial photographs. The findings are presented in subsequent sections below.

### 3.3.1 Historical Mapping

A summary of the development history of the Site and immediate surrounding area obtained from historic OS mapping and aerial photographs (Annex B) is detailed in the table below.

**Table 4: Summary of Historical Mapping**

Edition and Scale	On-site Activities	Off-site Activities (within ~ 250m)
1868 - 1871 (1:2,500 and 1:10,560)	The earliest available mapping shows the Site as undeveloped land.	<p>The Site is located within a predominantly rural / agricultural setting. Rookery Farm is present to the northeast of the Site as per its current location. Pond appears on mapping.</p> <p>An un-named road (now known as Botley Road) is present on the eastern boundary running in a north-south orientation.</p> <p>Well noted on an unnamed property to the east of road.</p>
1897 - 1898 (1:2,500 and 1:10,560)	The Site is covered in orchard type land use. Drainage streams shown running east to west.	<p>The orchard extends beyond the Site boundary surrounding Rookery Farm to the east and west.</p> <p>Yew Tree Farm now present to northeast of the Site.</p> <p>Netley and Fareham railway is present to the south of the Site boundary in its current location running in an east-west orientation. Track and bridge crossing present linking the Site to land south of the railway. Swanwick railway station is present on the map.</p> <p>Allotments and orchard located to the south of the railway.</p> <p>A clay pit is located to the south of Swanwick station near Beacon Bottom.</p>
1909 - 1910 (1:2,500 and 1:10,560)	No significant change, although part of an old clay pit is present extending into the southeast corner of the Site.	<p>An old clay pit is located to the southeast of the Site extending to the railway. An old brick kiln is recorded to the east of the Site beyond the clay pit and the road now known as Botley Road.</p> <p>Orchards are present to the south, beyond the railway.</p>
1931 - 1932 (1:2,500 and 1:10,560)	No significant change.	A sewage works is present to the south of the Site beyond the railway. Suspected residential properties are present to the east of the Site along the road now known as Botley Road.
1938-1942 (1:10,560)	No significant change.	No significant change.

Edition and Scale	On-site Activities	Off-site Activities (within ~ 250m)
1962 – 1963 (1:10,000)	Orchards now cover the entire Site area.	Orchards present around the Site and to the south of the railway.
1963-1968 (1:2,500 and 1:10,000)	Stream now named as a drain.	Yew Tree Farm no longer named.  Unnamed works present to the southeast of the Site to the north of the railway.  Sewage works to south are no longer present.  Residential properties currently present along Swanwick Road are now present on mapping.
1971 – 1983 (1:2,500 and 1:10,000)	No significant change.	The M27 motorway is present on the maps, located south of the Site between the Site and railway. The motorway runs in an east-west orientation. The former track and bridge has been extended to allow access from the Site to land south of the motorway and railway.
1990 – 1993 (1:10,000)	No significant change.	No significant changes. Works to southeast of the Site no longer present.
2000 (1:10,000)	Landfill now present on mapping	Significant residential development to east and northeast of the Site now shown on maps.
2017 (1: 10,000)	No significant change	No significant change.

### 3.3.2 Planning Records

The Client provided the following information relating to planning permissions for the Site.

- June 2006 – the Client obtained planning permission to retain the aggregate recycling facility for 15 years until 30<sup>th</sup> June 2021 (Ref: P/06/0443). The application involved the upgrading of the recycling plan and the agreement to complete landfilling by 31<sup>st</sup> December 2026;
- November 2014 – permanent planning permission granted for the inert recycling operations (Ref: P/14/0857/CC). The Client noted that this permission has not yet been implemented and current operations are still in accordance with the above permission dated June 2006.

In 2015 a variation to condition 24 of P/14/0857/CC was submitted to allow for an extension of time for the submission of details. Permission expires 02/03/2019.

### 3.3 Anecdotal Information

The Client provided the following anecdotal information relating to Site history:

- The Site was previously an orchard owned and managed by Rookery Farm;
- At the time of the M27 construction project, the owner of Rookery Farm agreed a change in land use to landfill operation. The Client understood that this was due to observed frost impacts to the orchard as a consequence of the adjacent motorway construction. It was understood that the motorway had created a 'frost hollow', which was impacting orchard productivity;
- Raymond Brown purchased the Site in 1999. At that time it was principally operated as an inert landfill with an aggregated recycling plant. The landfill had no time limit for completion and the aggregates recycling facility had a temporary permission with limited life;

- In June 2006 Raymond Brown obtained planning permission to retain the aggregate recycling facility for 15 years until 30<sup>th</sup> June 2021 (Ref: P/06/0443). The application involved the upgrading of the recycling plant and agreement to complete landfilling by 31<sup>st</sup> December 2026;
- On the 27<sup>th</sup> November 2014 permanent planning permission was granted for the inert recycling operations (ref: P/14/0857/CC). However, this permission has not yet been implemented and current operations continue under the permission reference P/06/0443;
- In 2015 a variation to condition 24 of P/14/0857/CC was submitted to allow for an extension of time for the submission of details. Permission expires 02/03/2019
- The washing plant has ceased operation, has been sold and is currently being decommissioned and removed from Site.
- Implementation of the 2014 permission would entail that the 2006 permission would be superseded and the landfilling would not need to be completed

### 3.3.4 Summary of the History of the Site and Surrounding Area

Based on the information obtained by TRC, the history of the Site and surrounding area can be summarised as follows:

- Historical mapping indicates the Site was undeveloped, suspected agricultural land from at least 1868. Rookery Farm was already established in its current location on the earliest available historical maps;
- Orchard land use is present from maps dated 1897 to 1898. The orchard land use continued on the Site until the 1980's/1990's;
- The M27 highway development is first recorded on mapping dated 1971-1983;
- According to the environmental permits database, landfilling commenced at the Site in 1984 and continued up until the Client's ownership of the property. The landfill is not shown on historical mapping until 2000;
- The Client acquired the Site in 1999 and still operates as an inert aggregates recycling facility with closed inert landfill.

## 3.4 Previous Environmental Assessments, Investigations or Remediation

### 3.4.1 Slope Stability

The Client noted that there had been reported slope failure on the southern face of the landfill along the boundary of the motorway in 2003. This triggered remediation and further assessment. TRC reviewed the following reports relating to slope stability:

- Robert Long Consultancy Limited (June 2003), Rookery Farm Landfill Site Southern Slope Remediation for Raymond Brown Eco-Bio Limited. Report ref: RBCL/RFL/SLP/01;
- Robert Long Consultancy Limited (May 2004), Rookery Farm Investigation for Raymond Brown Eco-Bio Limited. Letter reference JCC/jts/rb-1);
- WYG Environment (April 2009), Slope Stability Reassessment Report for Raymond Brown Minerals and Recycling Limited. Report reference: A055366;
- GWP Consultants (July 2014), Slope stability assessment for existing and future slopes at Rookery Farm Recycling Site for Raymond Brown Recycling. Report ref: 140108.

In summary, the reports document three areas of slope failure along the southern face of the inert landfill in 2002/2003. Investigations at the time of the failure noted that groundwater/leachate levels were causing destabilisation of the slope. Remediation works were carried out to reduce the level of groundwater/leachate, remove slipped material and regrade the slope using suitable material. French drains were constructed at this time.

The assessment carried out in 2014 inspected slopes on the former landfill and environmental bund on two occasions. The findings were as follows:

- Southern face of landfill – the site investigation concluded that there were three areas of concern which indicated possible movement and risk of future failure at the eastern end, west and western

end. The report concludes that whilst there were signs of distress and progressive failure, there was no evidence of deep seated slope failure where the volume of material involved in the failure would be significantly greater than the volume of material involved in localised shallow failures. The report noted that remedial works carried out in 2003 has stabilised the slope and there was no evidence of movement or distress in those areas.

- Northern slopes of landfill – the report observed that vegetation is improving slope stability and there is no evidence of slope failures. However, the report notes that shallow transitional slope failures would not be unexpected at the eastern end of this slope as the gradient becomes steeper than 1:2 (v:h);
- Northern screening bund – outer slopes appear in good condition and stable in the long term. Inner slopes contain unprocessed or post-processed material and limited vegetation. The report notes plans to remediate these slopes to ensure stability.

The conclusions of the report note further requirement to monitor and inspect slopes. Future slopes should be constructed to a recommended gradient of no steeper than 1:2.5 (v:h) or if above the motorway, no steeper than 1:3 (v:h). The report also notes plans for the Client to construct a gabion wall alongside the haul road at the toe of the inner side of the northern screening bund.

#### 3.4.2 Environmental Monitoring Data

The Client provided monitoring data for quarterly groundwater and ground monitoring carried out at the Site during 2017. The monitoring is carried out on designated locations across the inert landfill and wider site area. Parameters are screened against established trigger levels.

The data indicates that groundwater monitored does not contain any contamination that exceeds the agreed trigger levels.

Ground gas monitoring data generally did not detect significant concentrations of methane or carbon dioxide at any of the monitoring locations. Methane was typically less than 0.5% across the entire monitoring networks. Isolated hotspots were noted at GAS01 and Borehole 10 (July round only). The levels of methane detected were approximately 75%. These monitoring locations are located in the south of the Site on the upper section of the restored landfill and in close proximity to each other. It is assumed that these monitoring points are representative of ground gases derived from materials within the landfill.



## 4.0 Site Reconnaissance

### 4.1 Methodology and Limiting Conditions

Adam Sokolowski (TRC) carried out a site walkover on the 17<sup>th</sup> November 2017. The walkover was carried out with Lauren Finch (Planning and Development Manager), Steve Harman (Site Manager) and Mark Renault (Environmental Permitting Manager). On this reconnaissance every effort was made to inspect all areas of the Site.

Photographs of the site reconnaissance are included in Annex C.

### 4.2 General Site Setting and Observations

As noted in Section 2, the Site is split into two main areas:

- The aggregates recycling facility;
- The closed and restored inert landfill.

The Site operations comprise recycling of construction derived waste materials. The Site Representative reported that the Site imports and exports approximately 70,000 tonnes per annum (tpa), which is approximately half of the volume permitted under the planning permission (140,000tpa).

The Client reported that there are five full time staff comprising one site manager, one weighbridge operator, two shovel drivers and a plant operator. Recycling operations comprise crushing and screening of materials to generate various grades of soils including materials certified to British Standards.

Previous operations had included aggregates washing via a fixed plant. However, at the time of writing, the aggregate washing plant has ceased operation. The plant has been sold and is undergoing dismantling for removal from Site by the end of the year.

There are limited areas of hardstanding within the operational area. These areas are centred on the former washing plant. Materials are stored within dedicated stockpiles, either undergoing processing or in clearly defined stockpiles. There is some active landfilling to the immediate north of the operational area. This appears to be primarily associated with silt deposition.

The operational area is located within a topographic bowl, which is formed from the landfill (land raise) area in the southern half of the Site and the environmental screening bund along the northern boundary. The Client reported that the operational area is at near natural topographic level although some localised land raising may have occurred to aid drainage and create working platforms.

The closed landfill comprises a land raised portion of the Site, which is >10-14m above the ground level of the aggregates recycling operations. The surface of the former landfill is fully restored with managed grass top. The sides are formed of steep sided embankments with vegetation comprising small trees, shrubs and grasses. The Client reported that approximately 1 million tonnes of waste were deposited within the landfill.

The environmental bund to the north provides noise and visual screening from the residential properties along Swanwick Lane. The bunding is reportedly formed from inert recycled materials and is vegetated with small trees, shrubs and grass.

The Client also reported that the woodland area to the west of the Site also forms part of the ownership boundary.

There are open below ground tanks for water storage in the centre of the Site adjacent to the former aggregates washing plant. Two of the tanks are formed from steel tanks that have been buried just below

the surface with tops removed. There is a drainage pond on the western site boundary that receives water draining from the Site.

### 4.3 Environmental Management

The Client Representatives reported that the following environmental monitoring is carried out at the Site:

- Routine noise and dust monitoring carried out annually;
- Monthly monitoring of ground gas and groundwater at dedicated monitoring boreholes located around the Site. Monitoring carried out by UKAS accredited laboratory and data submitted to the EA.

The Client did not identify any concerns or regulatory enforcement relating to environmental monitoring.

TRC has reviewed quarterly groundwater and ground gas data from 2017. The data shows that the ground gas and groundwater quality was generally in compliance with the trigger thresholds. With the exception of some elevated methane and carbon dioxide (see Section 3.4.2), there are no significant concentrations that are elevated above the trigger thresholds.

### 4.4 Hazardous Substances and Petroleum Products Storage

The Site has the following Above Ground Storage Tanks (AST) for the storage of hazardous substances:

- 1 x AST for fuel oil storage. Steel constructed tank with double skinned secondary containment. Approximate capacity of 12m<sup>3</sup>;
- 1 x towable AST for fuel oil storage. Steel construction with double skinned secondary containment. Approximate capacity of 4.5m<sup>3</sup>;
- 1 x AST for waste oil storage. Steel construction with double skinned secondary containment. Approximately capacity of 2.5m<sup>3</sup>.

### 4.4 Underground Storage Tanks (UST)

The Client reported that there are three USTs (capacity unknown) at the Site located at the washing plant. The tanks are used to contain surface water runoff from the wash plant operations. The water was recycled within the washing operations.

There is one interceptor located adjacent to the site offices. The capacity is 5,000litres. The Client reported that this UST received wastewater from toilets and welfare. It is emptied annually.

### 4.5 Waste Management

The Site generates the following wastes:

- Floatation wastes from former washing processes – low density materials such as plastics and wood that were washed out of the aggregates during previous washing processes. These wastes were stockpiled in a designated storage area in the north of the Site awaiting removal from Site;
- Office and general waste – generated from Site offices and welfares. These wastes are placed within Client provided skips and deposited off-site at other Client managed waste management sites;
- Waste oils – stored within the waste oil tank (see Section 4.4) and removed by an accredited waste disposal contractor;
- Small volumes of greases and filters – generated by fitters during plant maintenance activities. These are removed from the Site and managed by the subcontract maintenance engineers.

### 4.5 Water and Wastewater

The Site is supplied by mains water which is used for Site welfare, wheel washing and dust suppression.

Foul wastewater is discharged to UST and emptied annually as reported above.

Surface water drainage is generally in a westerly direction with natural topographic slopes. The surface water drainage collects in the surface water pond. The Site Manager noted that this feature is designed to overflow into a secondary pond and discharge via a culvert beneath the motorway, which is the presumed natural course of previous streams. The Site Manager noted that he has never observed the pond to overflow.

There is a culverted stream/drain beneath the Site running in an east to west direction.

The Client reported a drainage ditch feature on the southern side of the landfill, which was associated with the motorway.

#### **4.6 Evidence of Spills, Staining or Corrosion on Floors or in External Areas**

There was no evidence of spills, staining or corrosion. The Client did not report any recorded incidents.

#### **4.7 Non-Natural Mounds or Depressions, Excavations and Fill**

There is evidence of land raising associated with the restored inert landfill to the south and north of the main entrance and environmental bund and silt deposits to the north. The Client noted that some local raising of levels had occurred within the operational area. It was noted that levels may have been raised by 2-3m in the south and 1-2m in the north. The Client reported that filling was with inert material associated with recycling operations.

There are mounds of materials associated with recycling operations and materials storage.

#### **4.8 Asbestos Containing Materials (ACM)**

TRC was not commissioned to perform an asbestos survey and no asbestos reports or management plans were provided for review. The Client did not report any ACMs present at the Site.

#### **4.9 Polychlorinated Biphenyls (PCB)**

Management are not aware of any PCBs on site and TRC would not expect there to be any given the age of the facility.

#### **4.10 Ozone Depleting Substances (ODS)**

There are air conditioning units associated with site offices. The Client reported that these are serviced annually by a specialist engineer. No records of ODSs were provided for review.

#### **4.11 Radioactive Materials**

Site management reported that no radioactive materials are stored at the subject property. There are no radioactive substances registered to the property address.

#### **4.12 Invasive Species**

This Phase I ESA did not include an invasive species survey. TRC did not observe any invasive plant species growing at the Site during the walkover.

#### **4.10 Summary of Site Walkover Observations**

The aggregate recycling operations have a low potential risk to the environment. The use of fuels and oils is managed appropriately and bulk fuels are stored within double skinned storage tanks in accordance with Oil Storage Regulations. Localised potential for leaks and spills from plant cannot be discounted.

---

The landfill received inert waste only. The monitoring data provided did not indicate significant presence of contamination.

## 5.0 Preliminary Environmental Risk Assessment

### 5.1 Conceptual Site Model

The methodology of this risk assessment uses the source-pathway-receptor pollutant linkage to provide a qualitative appraisal of environmental risks and potential liabilities associated with soil and groundwater contamination at the Site.

The conceptual site model (CSM) is prepared on the basis of proposed redevelopment to comprise residential end use across the operational area only. The restored landfill area would be designated as public open space.

### 5.2 Inputs

The following parameters have been considered within the CSM:

- **Sources** - There is limited potential for contamination within the operational area. It was observed that the operations use fuels, oils and grease for plant operations. However, it is considered that the Site operates under robust environmental stewardship and manages the storage and use of these potentially hazardous products appropriately.

The site operations manage recycling of inert aggregates. No contaminated soils are handled by the Site. The works are undertaken in accordance with environmental permits and have limited potential to cause contamination to underlying soils and groundwater.

The restored landfill is a potential source of contamination. The permits indicate that the landfill was authorised to accept various types of inert waste. However, leachates may contain contamination that could present a risk to human health and controlled waters.

The landfill is a potential source of ground gas (i.e. methane and carbon dioxide). However, it is noted that only the southern section of the landfill has boreholes that have detected significant concentrations.

- **Pathways** – TRC has considered human health risk pathways comprising dermal contact, ingestion, inhalation and plant uptake, leaching of contamination to ground, contact with buried services and migration of ground gases into proposed residential properties.
- **Receptors** – TRC has considered risks to human health (construction workers, future residents and general public accessing public open space) and controlled waters (surface water only as underlying soils are classified as unproductive).

### 5.3 Conceptual Site Model

**Table 5: Conceptual Site Model: Proposed Residential Development on the Current Operational Area**

Source	Pathway	Receptor	Risk
<b>On-Site Sources</b>			
<p>Potential localised hotspots of hydrocarbon contamination from plant refueling and maintenance</p> <p>Potentially infilling that may have the potential to generate ground gases</p>	Dermal contact, ingestion and inhalation pathways	Future site users	<p><b>Low</b></p> <p>Given the history of operations at the Site it is considered that there are no significant site sources. The geology comprises London Clay from near surface, which would limit contaminant migration.</p> <p>Hotspots of contamination would be remediated during redevelopment and engineering capping would be placed comprising hardstanding (building footprints and roadways) and subsoil/topsoil for gardens.</p>
		Neighbouring residents	<p><b>Very Low</b></p> <p>No significant site sources. Underlying geology is London Clay, which will mitigate risk of off-site migration.</p>
		Construction workers	<p><b>Very Low</b></p> <p>No significant site sources. Risk pathway to be mitigated via Personal Protective Equipment (PPE), good hygiene practices and construction site management.</p>
	Leaching of contaminants and vertical migration into groundwater	Controlled waters	<p><b>Very Low</b></p> <p>No significant site sources. Underlying geology is London Clay, which is classified as Unproductive Strata</p>
	Contact with buried services	Buried services	<p><b>Low</b></p> <p>Proposed development to consider risk of residual contamination and incorporate</p>



Source	Pathway	Receptor	Risk
			protective measures as appropriate.
	Migration of ground gases onto Site and ingress into buildings	Future site users	<b>Low to Moderate</b> Any risks to be mitigated through building design if required e.g. membrane or ventilation methods.
		Construction workers	<b>Low</b> Pathway to be managed through good construction practices and mitigation of risks when working in confined spaces.
Off-Site Sources			
Former inert landfill – potential for ground gas and leachate migration	Dermal contact, ingestion and inhalation pathways	Future site users	<b>Low</b> Landfill comprises inert waste. No significant contamination observed in groundwater data. Low permeability London Clay will mitigate potential for uncontrolled leachate or ground gas migration off site.
		Construction workers	<b>Low</b> As previous – risk pathways to be mitigated via PPE.
	Leaching of contaminants and infiltration into groundwater	Controlled waters	<b>Low</b> Near surface London Clay Formation is classified as Unproductive Strata. The presence of low permeability deposits would likely prevent migration into any groundwater.

**Table 6: Conceptual Site Model: Proposed Open Public Space on the Restored Landfill**

Source	Pathway	Receptor	Risk
<b>On-Site Sources</b>			
Inert waste deposits within the landfill. Potential source of leachate and ground gas.	Dermal contact, ingestion and inhalation pathways	Future site users	<b>Low</b> Site is capped and restored thereby removing pathway. Leachate drains and other drainage features that may contain contamination are fenced and isolated.
		Neighbouring residents	<b>Low</b> Underlying geology is London Clay, which will mitigate risk of off-site migration.
		Construction workers	<b>Not Applicable</b> No proposed development.
	Leaching of contaminants and vertical migration into groundwater	Controlled waters	<b>Very Low</b> Underlying geology is London Clay, which is classified as Unproductive Strata. Leachate managed via existing drainage at the Site.
	Contact with buried services	Buried services	<b>Not Applicable</b> No proposed development
	Migration of ground gases onto Site and ingress into buildings	Future site users	<b>Not applicable</b> No proposed development.
		Neighbouring residents	<b>Low to Moderate</b> London Clay to limit potential migration. However, any risks to be mitigated through building design if required e.g. membrane or ventilation methods.
		Construction workers	<b>Not applicable</b> No proposed development

## 5.4 Other Property Related Environmental Issues

### 5.4.1 Slope Stability

Geotechnical stability of slopes should be considered within the future development at the Site. Potential for future slope failure may create a potential hazard to the development or future Site users.

It is considered that the slopes to be considered would be the north and south elevation of the restored landfill only. It is considered that materials stockpiles and the environmental bund would be re-engineered to create a suitable platform for development.

To mitigate potential risk of slope failure, the existing geotechnical and slope assessment reviews prepared by others recommend monitoring and inspection of slopes to identify potential signs of failure and potential re-engineering of the slopes to improve drainage and stability. TRC consider that the most appropriate method of ensuring future slope stability would be to undertake re-engineering of the slopes to improve the gradients and drainage.

Engineering techniques could be employed to stabilise the slope could include passive methodologies such as tree planting and other such vegetation based methods to stabilise the surface of the soils, reinforced soil structures, piled solutions, ground anchors or retaining walls.

TRC recommend further assessment of the development plan to establish final site levels and distances of development from the slopes. This would then inform required slope stabilisation requirements and will identify appropriate methodologies.

### 5.4.2 Other Key Considerations

Other key environmental conditions for the proposed development.

**Table 7: Summary of Other Potential Environmental Issues**

Issue	Detail
Asbestos Containing Materials	There is limited potential for asbestos containing materials at the Site.
Coal Mining	Coal Authority records indicate that the Site is not located in an area that is affected by coal mining.
Radon	BGS records indicate that the Site is not in a radon affected area, as below 1% of homes are above the action level. On this basis, the BGS states that “no radon protective measures are necessary in the construction of new dwellings or extensions”.
Flood Risk	The database records indicate that the Site is located within an area that has limited potential for groundwater flooding to occur. The Environment Agency indicates that the Site is not within a flood risk zone (from surface water).

## 6.0 Conclusions

### 6.1 Findings

The Site has a history of agricultural / orchard land use until the 1980's when landfill was permitted at the property. The Client acquired the property in 1999 and operates it as an aggregates recycling facility and closed landfill.

The landfill is formed of a land raise and is >10-14m above the aggregates recycling area of the Site. The landfill received 1 million tonnes of inert waste. It is fully restored and closed.

The aggregates recycling operations comprise crushing and screening of imported construction derived materials. The aggregates washing plant is undergoing decommissioning and removal from Site.

### 6.2 Summary of Environmental Risk

TRC considers the operational area of the Site to be generally low with respect to contaminated land liability. The Site is situated on London Clay Formation from near surface and the operations appear to have limited potential for contaminant release. Use of hydrocarbon fuels, oils and grease is limited to plant fuelling and maintenance operations and has limited potential for site wide release.

The proposed residential development in this area has a high environmental sensitivity. However, it is considered that residual risks will be mitigated through the development design features such as placement of capping in gardens and landscaping (currently required for growing medium) and presence of hardstanding in building footprints and highways. Ground gas mitigation could also be engineered into the building design if required.

The landfill was operated as an inert landfill and is fully restored. Environmental data show no significant contamination within the leachate and no significant concentrations of ground gas. There are noted hotspots of ground gas in monitoring locations within the centre of the landfill mass.

Potential for leachate and ground gas migration is limited given that the landfill is situated on London Clay and raised above ground. Leachate is managed through drainage, which is fenced and isolated from unauthorised persons. Any future development surrounding the landfill should appraise and consider potential ground gas risks to ensure that appropriate mitigation measures are incorporated into the development design.

The landfill slopes are steep and well vegetated. Slope failure has been observed in the past and the Client has commissioned specialist engineers to undertake assessments and remedial work. Routine inspections are performed currently. Future development should consider the potential for future slope failure. The development design should consider the distance of proposed properties from the slopes and potential slope hazard. The development design should incorporate slope improvement works to either re-engineer to a shallower angle or undertake engineering works to retain and stabilise the current slopes.

Proposed open public land use on the restored landfill presents no significant contaminant linkage. The site restoration observed at the property includes capping and segregation layers. Drainage channels that may contain leachate are fenced and isolated from third parties thereby removing potential risk pathways.

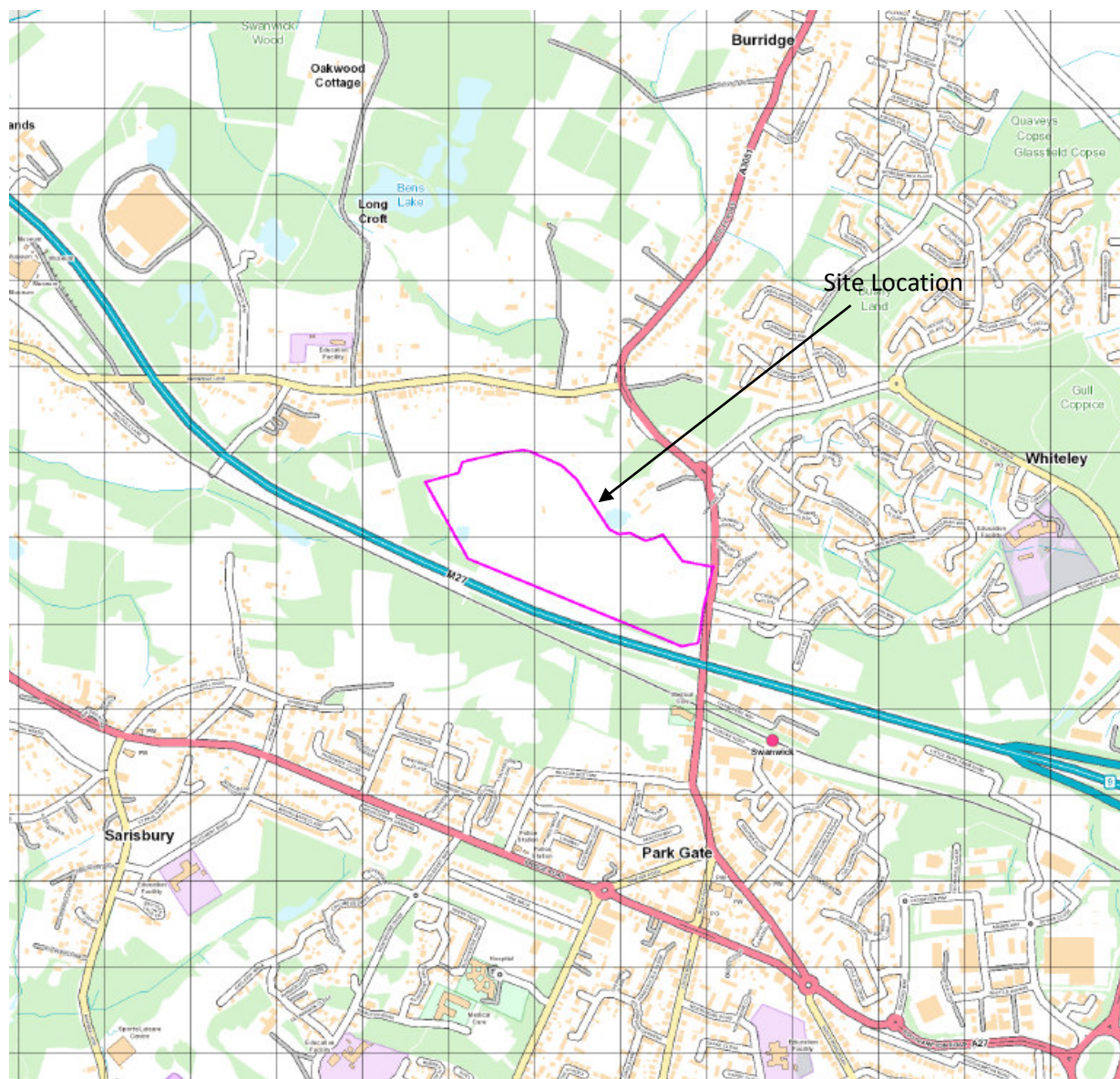
### 5.3 Recommendations

On the basis of this assessment, TRC consider that further investigation and assessment would be required upon completion of the proposed development design. Investigation would be required to appraise soil properties for geotechnical purposes to aid foundation design, during those works environmental assessment could be undertaken to appraise environmental condition including potential for soil and ground gases. A ground gas risk assessment will be required to appraise risks to proposed dwellings and scope of mitigation should this be required.

TRC recommend further assessment of slope stability upon completion of the development design and final formation levels to ensure that a robust restoration strategy is implemented to mitigate risks of slope failures along the northern boundary of the landfill, which will be adjacent to residential development. Specialist advice should be sought to identify the most appropriate methodology for stabilisation that meets the requirements of the development proposals.

## **Annex A: Figures**





CLIENT: <b>RAYMOND BROWN MINERALS AND RECYCLING LIMITED</b>	DRAWN BY: <b>SN</b>	PROJECT NO.: <b>291027.0000.0000</b>	DATE: <b>NOV 2017</b>	<b>ROOKERY FARM, SWANWICK</b>
<div data-bbox="107 1374 297 1461"> </div> <div data-bbox="320 1374 584 1437">           175 – 185 Gray's Inn Road            London, WC1X 8UE         </div> <div data-bbox="584 1445 819 1468"> <a href="http://www.trcsolutions.com/">http://www.trcsolutions.com/</a> </div>	Data Copyright © 2012, TRC Environmental, Inc. This map does not represent a legal document. It is intended to serve as an aid in graphical representation only. Information shown on this map is not warranted for accuracy or fitness for any particular purpose.			FIGURE: <div data-bbox="2040 1398 2074 1453">1</div>

## **Annex B: Envirocheck Report**

# Envirocheck<sup>®</sup> Report:

## Datasheet

### Order Details:

**Order Number:**

145633529\_1\_1

**Customer Reference:**

C289128

**National Grid Reference:**

451290, 109180

**Slice:**

A

**Site Area (Ha):**

14.84

**Search Buffer (m):**

1000

### Site Details:

Site at  
Swanwick  
Hampshire

### Client Details:

Mr W Nitch-Smith  
TRC Companies Ltd



Report Section	Page Number
Summary	-
Agency & Hydrological	1
Waste	26
Hazardous Substances	-
Geological	31
Industrial Land Use	34
Sensitive Land Use	47
Data Currency	48
Data Suppliers	53
Useful Contacts	54

## Introduction

The Environment Act 1995 has made site sensitivity a key issue, as the legislation pays as much attention to the pathways by which contamination could spread, and to the vulnerable targets of contamination, as it does the potential sources of contamination. For this reason, Landmark's Site Sensitivity maps and Datasheet(s) place great emphasis on statutory data provided by the Environment Agency/Natural Resources Wales and the Scottish Environment Protection Agency; it also incorporates data from Natural England (and the Scottish and Welsh equivalents) and Local Authorities; and highlights hydrogeological features required by environmental and geotechnical consultants. It does not include any information concerning past uses of land. The datasheet is produced by querying the Landmark database to a distance defined by the client from a site boundary provided by the client.

In the attached datasheet the National Grid References (NGRs) are rounded to the nearest 10m in accordance with Landmark's agreements with a number of Data Suppliers.

## Copyright Notice

© Landmark Information Group Limited 2017. The Copyright on the information and data and its format as contained in this Envirocheck® Report ("Report") is the property of Landmark Information Group Limited ("Landmark") and several other Data Providers, including (but not limited to) Ordnance Survey, British Geological Survey, the Environment Agency/Natural Resources Wales and Natural England, and must not be reproduced in whole or in part by photocopying or any other method. The Report is supplied under Landmark's Terms and Conditions accepted by the Customer.

A copy of Landmark's Terms and Conditions can be found with the Index Map for this report. Additional copies of the Report may be obtained from Landmark, subject to Landmark's charges in force from time to time. The Copyright, design rights and any other intellectual rights shall remain the exclusive property of Landmark and /or other Data providers, whose Copyright material has been included in this Report.

## Natural England Copyright Notice

Site of Special Scientific Interest, National Nature Reserve, Ramsar, Special Protection Area, Special Conservation Area, Marine Nature Reserve data (derived from Ordnance Survey 1:10000 raster) is provided by, and used with the permission of, Natural England who retain the copyright and Intellectual Property Rights for the data.

## Ove Arup Copyright Notice

The Data provided in this report was obtained on Licence from Ove Arup & Partners Limited (for further information, contact mining.review@arup.com). No reproduction or further use of such Data is to be made without the prior written consent of Ove Arup & Partners Limited. The information and data supplied in the product are derived from publicly available records and other third party sources and neither Ove Arup & Partners nor Landmark warrant the accuracy or completeness of such information or data.

## Peter Brett Associates Copyright Notice

The cavity data presented has been extracted from the PBA enhanced version of the original DEFRA national cavity databases. PBA/DEFRA retain the copyright & intellectual property rights in the data. Whilst all reasonable efforts are made to check that the information contained in the cavity databases is accurate we do not warrant that the data is complete or error free. The information is based upon our own researches and those collated from a number of external sources and is continually being augmented and updated by PBA. In no event shall PBA/DEFRA or Landmark be liable for any loss or damage including, without limitation, indirect or consequential loss or damage arising from the use of this data.

## Radon Potential dataset Copyright Notice

Information supplied from a joint dataset compiled by The British Geological Survey and Public Health England.

## Report Version v53.0

Data Type	Page Number	On Site	0 to 250m	251 to 500m	501 to 1000m (*up to 2000m)
<b>Agency &amp; Hydrological</b>					
BGS Groundwater Flooding Susceptibility	pg 1		Yes	Yes	n/a
Contaminated Land Register Entries and Notices					
Discharge Consents	pg 1		2	6	13
Prosecutions Relating to Controlled Waters			n/a	n/a	n/a
Enforcement and Prohibition Notices					
Integrated Pollution Controls					
Integrated Pollution Prevention And Control	pg 6	1	2		
Local Authority Integrated Pollution Prevention And Control					
Local Authority Pollution Prevention and Controls	pg 7			1	4
Local Authority Pollution Prevention and Control Enforcements					
Nearest Surface Water Feature	pg 7	Yes			
Pollution Incidents to Controlled Waters	pg 8		3	4	6
Prosecutions Relating to Authorised Processes					
Registered Radioactive Substances					
River Quality	pg 10				1
River Quality Biology Sampling Points					
River Quality Chemistry Sampling Points					
Substantiated Pollution Incident Register	pg 10			1	
Water Abstractions	pg 10			1	1 (*7)
Water Industry Act Referrals					
Groundwater Vulnerability	pg 12	Yes	n/a	n/a	n/a
Drift Deposits			n/a	n/a	n/a
Bedrock Aquifer Designations	pg 12	Yes	n/a	n/a	n/a
Superficial Aquifer Designations			n/a	n/a	n/a
Source Protection Zones					
Extreme Flooding from Rivers or Sea without Defences				n/a	n/a
Flooding from Rivers or Sea without Defences				n/a	n/a
Areas Benefiting from Flood Defences				n/a	n/a
Flood Water Storage Areas				n/a	n/a
Flood Defences				n/a	n/a
OS Water Network Lines	pg 13	1	14	37	65

Data Type	Page Number	On Site	0 to 250m	251 to 500m	501 to 1000m (*up to 2000m)
<b>Waste</b>					
BGS Recorded Landfill Sites					
Historical Landfill Sites	pg 26				1
Integrated Pollution Control Registered Waste Sites					
Licensed Waste Management Facilities (Landfill Boundaries)	pg 26	3			
Licensed Waste Management Facilities (Locations)	pg 26	3			2
Local Authority Landfill Coverage		2	n/a	n/a	n/a
Local Authority Recorded Landfill Sites					
Registered Landfill Sites	pg 28	3			1
Registered Waste Transfer Sites	pg 30				1
Registered Waste Treatment or Disposal Sites					
<b>Hazardous Substances</b>					
Control of Major Accident Hazards Sites (COMAH)					
Explosive Sites					
Notification of Installations Handling Hazardous Substances (NIHHS)					
Planning Hazardous Substance Consents					
Planning Hazardous Substance Enforcements					
<b>Geological</b>					
BGS 1:625,000 Solid Geology	pg 31	Yes	n/a	n/a	n/a
BGS Recorded Mineral Sites	pg 31		2	2	3
CBSCB Compensation District			n/a	n/a	n/a
Coal Mining Affected Areas			n/a	n/a	n/a
Mining Instability			n/a	n/a	n/a
Man-Made Mining Cavities					
Natural Cavities					
Non Coal Mining Areas of Great Britain				n/a	n/a
Potential for Collapsible Ground Stability Hazards	pg 32	Yes		n/a	n/a
Potential for Compressible Ground Stability Hazards				n/a	n/a
Potential for Ground Dissolution Stability Hazards				n/a	n/a
Potential for Landslide Ground Stability Hazards	pg 32	Yes	Yes	n/a	n/a
Potential for Running Sand Ground Stability Hazards	pg 32		Yes	n/a	n/a
Potential for Shrinking or Swelling Clay Ground Stability Hazards	pg 33	Yes	Yes	n/a	n/a
Radon Potential - Radon Affected Areas			n/a	n/a	n/a
Radon Potential - Radon Protection Measures			n/a	n/a	n/a



Data Type	Page Number	On Site	0 to 250m	251 to 500m	501 to 1000m (*up to 2000m)
<b>Industrial Land Use</b>					
Contemporary Trade Directory Entries	pg 34		11	57	72
Fuel Station Entries	pg 46				2
Gas Pipelines					
Underground Electrical Cables					
<b>Sensitive Land Use</b>					
Ancient Woodland	pg 47			2	5
Areas of Adopted Green Belt					
Areas of Unadopted Green Belt					
Areas of Outstanding Natural Beauty					
Environmentally Sensitive Areas					
Forest Parks					
Local Nature Reserves	pg 47				1
Marine Nature Reserves					
National Nature Reserves					
National Parks					
Nitrate Sensitive Areas					
Nitrate Vulnerable Zones	pg 47	1			
Ramsar Sites					
Sites of Special Scientific Interest					
Special Areas of Conservation					
Special Protection Areas					
World Heritage Sites					

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A10SE (SW)	119	1	451100 109000
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A11NW (NE)	232	1	451500 109450
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A6NE (S)	247	1	451250 108800
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A10SE (SW)	269	1	451000 108850
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A7NW (S)	275	1	451293 108750
	<b>BGS Groundwater Flooding Susceptibility</b> Flooding Type: Limited Potential for Groundwater Flooding to Occur	A7NW (S)	283	1	451300 108700
1	<b>Discharge Consents</b> Operator: L Hughes Esq Property Type: Not Given Location: On House Adjoining, The Orchard, Botley Road, SOUTHWICK Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: UV63/2553 Permit Version: Not Supplied Effective Date: Not Supplied Issued Date: 21st June 1979 Revocation Date: Not Supplied Discharge Type: Unknown Discharge: Land/Soakaway Environment: Receiving Water: Not Supplied <b>Status: Not Supplied</b> Positional Accuracy: Located by supplier to within 100m	A11NE (E)	108	2	451700 109200
2	<b>Discharge Consents</b> Operator: P A Trussler Property Type: Undefined Or Other Location: Yew Tree Farm, Swanwick, Southampton, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Supplied Reference: H00071 Permit Version: 1 Effective Date: 22nd January 1965 Issued Date: 22nd January 1965 Revocation Date: 1st July 1991 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status: Pre National Rivers Authority Legislation where issue date &lt; 01/09/1989</b> Positional Accuracy: Located by supplier to within 10m	A11NE (NE)	218	2	451680 109340
3	<b>Discharge Consents</b> Operator: W Dugan & Sons Ltd. Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: 94 Botley Road, Park Gate, Fareham, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P03830 Permit Version: 1 Effective Date: 22nd October 1991 Issued Date: 22nd October 1991 Revocation Date: 31st March 1997 Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status: Lapsed (under Environment Act 1995, Schedule 23)</b> Positional Accuracy: Located by supplier to within 100m	A7NW (SE)	302	2	451600 108650

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
4	<b>Discharge Consents</b> Operator: P.G.Hartmann Esq. Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: P.G.Hartmann Esq., 96 Swanwick Lane, Swanwick Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P00322 Permit Version: 1 Effective Date: 26th March 1986 Issued Date: 26th March 1986 Revocation Date: 31st March 1997 Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status: Lapsed (under Environment Act 1995, Schedule 23)</b> Positional Accuracy: Located by supplier to within 100m	A14SW (NW)	312	2	450750 109570
5	<b>Discharge Consents</b> Operator: Mr R J Skinner Property Type: Undefined Or Other Location: Colombo, Swanwick Lane, Swanwick, Southampton Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P00133 Permit Version: 1 Effective Date: 1st October 1985 Issued Date: 1st October 1985 Revocation Date: Not Supplied Discharge Type: Non Water Company (Private) Sewage Discharge: Saline Estuary Environment: Receiving Water: Saline Estuary <b>Status: Pre National Rivers Authority Legislation where issue date &lt; 01/09/1989</b> Positional Accuracy: Located by supplier to within 100m	A14SW (NW)	427	2	450930 109790
6	<b>Discharge Consents</b> Operator: Mr & Mrs.C.E.Walford Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: 139 Swanwick Lane, Lower Swanwick 139 Swanwick Lane, Sarisbury, Lower Swanwick, Hampshire, So31 7hb Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P00233 Permit Version: 1 Effective Date: 14th November 1985 Issued Date: 14th November 1985 Revocation Date: 31st March 1997 Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status: Lapsed (under Environment Act 1995, Schedule 23)</b> Positional Accuracy: Located by supplier to within 100m	A13SE (NW)	463	2	450530 109530
6	<b>Discharge Consents</b> Operator: P.C.Markwick Esq. Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: P.C.Markwick Esq., 133 Swanwick Lane, Swanwick, Southampton Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P00208 Permit Version: 1 Effective Date: 26th September 1985 Issued Date: 26th September 1985 Revocation Date: Not Supplied Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status: Pre National Rivers Authority Legislation where issue date &lt; 01/09/1989</b> Positional Accuracy: Located by supplier to within 100m	A13SE (NW)	472	2	450520 109530

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
6	<b>Discharge Consents</b> Operator: Southern Water Services Ltd (H) Property Type: STORM TANK/CSO ON SEWERAGE NETWORK (WATER COMPANY) Location: Swanwick Lane, Sarisbury, Fareham, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: A00368 Permit Version: 1 Effective Date: 1st April 1991 Issued Date: 1st April 1991 Revocation Date: 6th March 1996 Discharge Type: Public Sewage: Storm Sewage Overflow Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> Post National Rivers Authority Legislation where issue date > 31/08/1989 Positional Accuracy: Located by supplier to within 100m	A9NE (W)	479	2	450500 109500
7	<b>Discharge Consents</b> Operator: Hampshire County Council Property Type: REAL ESTATE ACTIVITIES/BUYING/SELLING/RENTING Location: Segensworth West Employment Area, Locks Heath, Fareham, Hampshire, Po15 5** Authority: Environment Agency, Southern Region Catchment Area: Old-R Hamble Bishop Wal Reference: N01174 Permit Version: 1 Effective Date: 24th March 1982 Issued Date: 24th March 1982 Revocation Date: 4th May 1995 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Unnamed Trib Of River Hamble <b>Status:</b> Pre National Rivers Authority Legislation where issue date < 01/09/1989 Positional Accuracy: Located by supplier to within 10m	A8NW (SE)	712	2	452160 108540
8	<b>Discharge Consents</b> Operator: Norwest Holst Construction Ltd. Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: Norwest Holst Construction Ltd., Whiteley Pk Proj Ofces, Contractors Temporary Offices Wh, Fareham Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P01751 Permit Version: 1 Effective Date: 2nd August 1988 Issued Date: 2nd August 1988 Revocation Date: 31st March 1997 Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status:</b> Lapsed (under Environment Act 1995, Schedule 23) Positional Accuracy: Located by supplier to within 100m	A12NE (E)	761	2	452370 109230
9	<b>Discharge Consents</b> Operator: Hampshire County Council Property Type: REAL ESTATE ACTIVITIES/BUYING/SELLING/RENTING Location: Segensworth West Employment Area, Locks Heath, Fareham, Hampshire, Po15 5** Authority: Environment Agency, Southern Region Catchment Area: Old-R Hamble Bishop Wal Reference: N01174 Permit Version: 4 Effective Date: 29th May 1996 Issued Date: 29th May 1996 Revocation Date: 10th September 2002 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Unnamed Trib Of River Hamble <b>Status:</b> Revoked (Water Resources Act 1991, Section 88 & Schedule 10 as amended by Environment Act 1995) Positional Accuracy: Located by supplier to within 10m	A8NE (SE)	781	2	452300 108650

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
9	<b>Discharge Consents</b> Operator: Hampshire County Council Property Type: REAL ESTATE ACTIVITIES/BUYING/SELLING/RENTING Location: Segensworth West Employment Area, Locks Heath, Fareham, Hampshire, Po15 5** Authority: Environment Agency, Southern Region Catchment Area: Old-R Hamble Bishop Wal Reference: N01174 Permit Version: 2 Effective Date: 5th May 1995 Issued Date: 5th May 1995 Revocation Date: 29th June 1995 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Unnamed Trib Of River Hamble <b>Status:</b> <b>Modified (Water Resources Act 1991, Schedule 10 as amended by Environment Act 1995)</b> Positional Accuracy: Located by supplier to within 10m	A8NE (SE)	781	2	452300 108650
10	<b>Discharge Consents</b> Operator: Pelham Homes (Whiteley Park) Ltd. Property Type: Undefined Or Other Location: Whiteley Park North, Fareham, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P02043 Permit Version: 1 Effective Date: 2nd December 1988 Issued Date: 2nd December 1988 Revocation Date: 28th March 1996 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> <b>Pre National Rivers Authority Legislation where issue date &lt; 01/09/1989</b> Positional Accuracy: Located by supplier to within 100m	A16SW (NE)	783	2	451990 109820
11	<b>Discharge Consents</b> Operator: B.Richardson Esq. Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: B.Richardson Esq., 159 Swanwick Lane, Swanwick, Fareham Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P00263 Permit Version: 1 Effective Date: 7th February 1986 Issued Date: 7th February 1986 Revocation Date: 31st March 1997 Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status:</b> <b>Lapsed (under Environment Act 1995, Schedule 23)</b> Positional Accuracy: Located by supplier to within 100m	A13SW (W)	812	2	450160 109530
12	<b>Discharge Consents</b> Operator: Hampshire County Council Property Type: REAL ESTATE ACTIVITIES/BUYING/SELLING/RENTING Location: Segensworth West Employment Area, Locks Heath, Fareham, Hampshire, Po15 5** Authority: Environment Agency, Southern Region Catchment Area: Old-R Hamble Bishop Wal Reference: N01174 Permit Version: 3 Effective Date: 30th June 1995 Issued Date: 30th June 1995 Revocation Date: 28th May 1996 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Unnamed Trib Of River Hamble <b>Status:</b> <b>Modified (Water Resources Act 1991, Schedule 10 as amended by Environment Act 1995)</b> Positional Accuracy: Located by supplier to within 10m	A8NE (SE)	820	2	452300 108560

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
13	<b>Discharge Consents</b> Operator: Pelham Homes (Whiteley Park) Ltd. Property Type: Undefined Or Other Location: Whiteley Park North, Fareham, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P02043 Permit Version: 1 Effective Date: 2nd December 1988 Issued Date: 2nd December 1988 Revocation Date: 28th March 1996 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> Pre National Rivers Authority Legislation where issue date < 01/09/1989 Positional Accuracy: Located by supplier to within 100m	A16NW (NE)	870	2	452060 109880
14	<b>Discharge Consents</b> Operator: N R Trickett Ltd Property Type: CONSTRUCTION OF BUILDINGS Location: Housing Estate Sewage Works, Allotment Road, Sarisbury Green Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Supplied Reference: H01015 Permit Version: 1 Effective Date: 18th October 1963 Issued Date: 18th October 1963 Revocation Date: 1st July 1991 Discharge Type: Non Water Company (Private) Sewage Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> Pre National Rivers Authority Legislation where issue date < 01/09/1989 Positional Accuracy: Located by supplier to within 100m	A5NE (SW)	917	2	450400 108500
15	<b>Discharge Consents</b> Operator: Pelham Homes (Whiteley Park) Ltd. Property Type: Undefined Or Other Location: Whiteley Park North, Fareham, Hampshire Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: P02043 Permit Version: 1 Effective Date: 2nd December 1988 Issued Date: 2nd December 1988 Revocation Date: 28th March 1996 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> Pre National Rivers Authority Legislation where issue date < 01/09/1989 Positional Accuracy: Located by supplier to within 100m	A16NW (NE)	949	2	452130 109930
16	<b>Discharge Consents</b> Operator: Kier Highways Limited Property Type: LAND TRANSPORT + VIA PIPELINES/FREIGHT Location: Hcc Road Depot, Near M27 Parkgate Interchange, Parkgate, Hampshire, Po15 7** Authority: Environment Agency, Southern Region Catchment Area: Not Supplied Reference: P06671r Permit Version: 1 Effective Date: 1st April 1997 Issued Date: 1st April 1997 Revocation Date: Not Supplied Discharge Type: Trade Effluent Discharge-Site Drainage Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> New Consent (Water Resources Act 1991, Section 88 & Schedule 10 as amended by Environment Act 1995) Positional Accuracy: Located by supplier to within 10m	A12SE (E)	972	2	452560 108900



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
16	<b>Discharge Consents</b> Operator: Raynesway Construction Southern Property Type: LAND TRANSPORT + VIA PIPELINES/FREIGHT Location: H.C.C. Road Depot, Parkgate I/Change @ M27, Parkgate, Hampshire, Po15 7** Authority: Environment Agency, Southern Region Catchment Area: Not Given Reference: N01119I Permit Version: 1 Effective Date: 8th December 1980 Issued Date: 8th December 1980 Revocation Date: 31st March 1997 Discharge Type: Discharge Of Other Matter-Surface Water Discharge: Freshwater Stream/River Environment: Receiving Water: Freshwater River <b>Status:</b> Lapsed (under Environment Act 1995, Schedule 23) Positional Accuracy: Located by supplier to within 100m	A12SE (E)	972	2	452560 108900
17	<b>Discharge Consents</b> Operator: Mr & Mrs Rose Property Type: DOMESTIC PROPERTY (SINGLE) (INCL FARM HOUSE) Location: The Bungalow, Woodbarn Nurseries, New Road, Swanwick, Hants, So31 Authority: Environment Agency, Southern Region Catchment Area: Not Supplied Reference: P010520 Permit Version: 1 Effective Date: 17th December 2001 Issued Date: 17th December 2001 Revocation Date: Not Supplied Discharge Type: Sewage Discharges - Final/Treated Effluent - Not Water Company Discharge: Into Land Environment: Receiving Water: Into Land <b>Status:</b> Pre National Rivers Authority Legislation where issue date < 01/09/1989 Positional Accuracy: Located by supplier to within 10m	A18SW (NW)	982	2	450650 110280
18	<b>Prosecutions Relating to Controlled Waters</b> Location: Sewage Treatment Works, SARISBURY, Hampshire, . Prosecution Text: Environment Times Volume 6 Issue 1 (Autumn 1999), Discharging Sewage Into An Unnamed Tributary Of The River Hambleon The 20th August 1998. Prosecution Act: Wra91 Hearing Date: 10th August 1999 Verdict: Guilty Fine: 2500 Cost: 670 Positional Accuracy: Manually positioned within the geographical locality	A5NW (SW)	895	2	450253 108734
19	<b>Integrated Pollution Prevention And Control</b> Name: Raymond Brown Eco Bio Limited Location: Rookery Farm Landfill Site, Rookery Farm Landfill Site, Botley Road,,Burridge, SOUTHAMPTON, Hampshire, SO31 1BL Authority: Environment Agency - South East Region, Solent & South Downs Area Permit Reference: MP3239BR Original Permit Ref: Mp3239br Effective Date: 9th November 2005 <b>Status:</b> Superseded By Variation Application Type: Application App. Sub Type: New Positional Accuracy: Located by supplier to within 100m Activity Code: 5.1 A(1) (B) Activity Description: Co-Incineration Of Hazardous Waste Primary Activity: Y	A10NE (W)	0	2	451100 109200
20	<b>Integrated Pollution Prevention And Control</b> Name: Raymond Brown Eco Bio Limited Location: Rookery Farm Landfill Site, Rookery Farm Landfill Site, Botley Road,,Burridge, SOUTHAMPTON, Hampshire, SO31 1BL Authority: Environment Agency, Southern Region Permit Reference: AP3339UM Original Permit Ref: Mp3239br Effective Date: 31st March 2008 <b>Status:</b> Revoked Application Type: Variation App. Sub Type: Minor Positional Accuracy: Manually positioned to the address or location Activity Code: 5.1 A(1) (B) Activity Description: Co-Incineration Of Hazardous Waste Primary Activity: Y	A11NW (NE)	72	2	451437 109280

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
20	<b>Integrated Pollution Prevention And Control</b> Name: Raymond Brown Eco Bio Limited Location: Rookery Farm Landfill Site, Rookery Farm Landfill Site, Botley Road, Burridge, SOUTHAMPTON, Hampshire, SO31 1BL Authority: Environment Agency, Southern Region Permit Reference: Mp3239br Original Permit Ref: Mp3239br Effective Date: 9th November 2005 <b>Status: Superseded By Variation</b> Application Type: Application App. Sub Type: New Positional Accuracy: Manually positioned to the address or location Activity Code: 5.1 A(1) (B) Activity Description: Co-Incineration Of Hazardous Waste Primary Activity: Y	A11NW (NE)	115	2	451466 109316
21	<b>Local Authority Pollution Prevention and Controls</b> Name: Pressing Needs Ltd Location: Unit 2 Duncan Road, Park Gate, Fareham, So31 1bd Authority: Fareham Borough Council, Environmental Health Department Permit Reference: 1599 Dated: 31st August 2007 Process Type: Local Authority Pollution Prevention and Control Description: PG6/46 Dry cleaning <b>Status: Permitted</b> Positional Accuracy: Manually positioned to the address or location	A7NE (SE)	348	3	451769 108661
22	<b>Local Authority Pollution Prevention and Controls</b> Name: South Coast Cleaners Location: 9 Middle Road, Park Gate, Southampton, So31 7gh Authority: Fareham Borough Council, Environmental Health Department Permit Reference: 1551 Dated: 31st August 2007 Process Type: Local Authority Pollution Prevention and Control Description: PG6/46 Dry cleaning <b>Status: Permitted</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	617	3	451571 108331
23	<b>Local Authority Pollution Prevention and Controls</b> Name: Locksheath Service Station Location: Bridge Road, Park Gate, FAREHAM, Hampshire, SO3 7ZE Authority: Fareham Borough Council, Environmental Health Department Permit Reference: 1515 Dated: 30th November 1998 Process Type: Local Authority Pollution Prevention and Control Description: PG1/14 Petrol filling station <b>Status: Permitted</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	642	3	451369 108329
24	<b>Local Authority Pollution Prevention and Controls</b> Name: Park Gate Service Station Location: 2 Bridge Road, Park Gate, SOUTHAMPTON, Hampshire, SO31 7GE Authority: Fareham Borough Council, Environmental Health Department Permit Reference: 1519 Dated: 23rd December 1998 Process Type: Local Authority Pollution Prevention and Control Description: PG1/14 Petrol filling station <b>Status: Permitted</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	778	3	451799 108207
25	<b>Local Authority Pollution Prevention and Controls</b> Name: Solent Body Builders & Repairers Ltd. Location: 11 Cockerell Close, Segensworth West, FAREHAM, Hampshire, PO15 5SR Authority: Fareham Borough Council, Environmental Health Department Permit Reference: 1506 Dated: 22nd December 1993 Process Type: Local Authority Pollution Prevention and Control Description: PG6/34 Respraying of road vehicles <b>Status: Permitted</b> Positional Accuracy: Located by supplier to within 10m	A8SW (SE)	836	3	452226 108423
	<b>Nearest Surface Water Feature</b>	A11SW (SE)	0	-	451587 109037

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
26	<b>Pollution Incidents to Controlled Waters</b> Property Type: Wholesale & Retail Trade Location: Chandlers Way, Park Gate, SOUTHAMPTON Authority: Environment Agency, Southern Region Pollutant: General Biodegradable : Industrial & Commercial Waste Note: Not Supplied Incident Date: 23rd April 1999 Incident Reference: 1081 Catchment Area: Hamble Receiving Water: Potential River Cause of Incident: Deliberate Action Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 10m	A7NW (SE)	155	2	451600 108800
27	<b>Pollution Incidents to Controlled Waters</b> Property Type: Industrial: Other Location: Glen Road, SWANWICK Authority: Environment Agency, Southern Region Pollutant: Crude Sewage Note: Stream Discoloured; Landfill/Waste Disposal Site Incident Date: 11th October 1994 Incident Reference: 1507 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Plc Sewage Other Incident Severity: Category 2 - Significant Incident Positional Accuracy: Located by supplier to within 100m	A10SE (SW)	157	2	451000 109000
28	<b>Pollution Incidents to Controlled Waters</b> Property Type: Domestic/Residential Location: Rookery Farm, Park Gate Authority: Environment Agency, Southern Region Pollutant: Oils - Gas Oil Note: Diesel On Pond And Dead Fish Incident Date: 16th September 1993 Incident Reference: 858 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Oils/Related Products Incident Severity: Category 2 - Significant Incident Positional Accuracy: Located by supplier to within 100m	A11NW (NE)	194	2	451500 109400
29	<b>Pollution Incidents to Controlled Waters</b> Property Type: Construction/Demolition Location: Location Description Not Available Authority: Environment Agency, Southern Region Pollutant: Oils - Petrol Note: Oil On The Surface Of Water Incident Date: 1st October 1993 Incident Reference: 876 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Oils/Related Products Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A11NE (NE)	325	2	451800 109400
30	<b>Pollution Incidents to Controlled Waters</b> Property Type: Water Company Sewage: Other Location: Location Description Not Available Authority: Environment Agency, Southern Region Pollutant: Crude Sewage Note: Sewer Surcharging At Above Premises; Water Company Sewage: Foul Sewer Incident Date: 26th September 1994 Incident Reference: 1474 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Plc Sewage Other Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A9NE (W)	370	2	450600 109200
30	<b>Pollution Incidents to Controlled Waters</b> Property Type: WSC Sewage, Sewerage & Supply Location: Glen Road, Sarisbury Green, SOUTHAMPTON Authority: Environment Agency, Southern Region Pollutant: General Biodegradable : Crude Sewage & Sewerage Material Note: Not Supplied Incident Date: 16th September 1999 Incident Reference: 2751 Catchment Area: Hamble Receiving Water: Potential River Cause of Incident: Drainage Failures : Foul Sewer Failure Incident Severity: Category 3 - Minor Incident Positional Accuracy: Approximate location provided by supplier	A9NE (W)	372	2	450600 109195

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
31	<b>Pollution Incidents to Controlled Waters</b> Property Type: Water Company Sewage: Other Location: Glen Road, Sarisbury, Locksheath Authority: Environment Agency, Southern Region Pollutant: Crude Sewage Note: Discharge From Blocked Sewer; Water Company Sewage: Foul Sewer Incident Date: 1st November 1995 Incident Reference: 2135 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Plc Sewage Other Incident Severity: Category 2 - Significant Incident Positional Accuracy: Located by supplier to within 100m	A9NE (W)	448	2	450500 109300
32	<b>Pollution Incidents to Controlled Waters</b> Property Type: Not Given Location: Into Watercourse At, SWANWICK Authority: Environment Agency, Southern Region Pollutant: Miscellaneous - Urban Runoff Note: Discharge Of Oil Contaminated Storm Water Incident Date: 17th May 1993 Incident Reference: 675 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Oils/Related Products Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A7SE (SE)	728	2	451900 108300
33	<b>Pollution Incidents to Controlled Waters</b> Property Type: Water Company Sewage: Foul Sewer Location: 14 Burrridge Road, BURRRIDGE Authority: Environment Agency, Southern Region Pollutant: Sewage - Septic Tank Effluent Note: Discharge From Blocked Sewer Incident Date: 27th October 1997 Incident Reference: 797530 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Not Given Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A15NW (N)	762	2	451600 110050
34	<b>Pollution Incidents to Controlled Waters</b> Property Type: Water Company Sewage: Other Location: Stream At Foot Of Motoring Embankment Authority: Environment Agency, Southern Region Pollutant: Chemicals - Unknown Note: Oil In Stream; Water Company Sewage: Surface Water Outfall Incident Date: 15th February 1994 Incident Reference: 1084 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Oils/Related Products Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A8NE (SE)	763	2	452300 108700
35	<b>Pollution Incidents to Controlled Waters</b> Property Type: Not Given Location: Location Description Not Available Authority: Environment Agency, Southern Region Pollutant: Miscellaneous - Natural Note: Scummy Stream With Oil Incident Date: 9th June 1994 Incident Reference: 1297 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Miscellaneous/Other Pollution Type Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A5NE (SW)	775	2	450500 108600
36	<b>Pollution Incidents to Controlled Waters</b> Property Type: Other General Premises Location: Lower Duncan Road, PARKGATE Authority: Environment Agency, Southern Region Pollutant: Oils - Unknown Note: Oil In Stream; Domestic/Residential Incident Date: 4th February 1995 Incident Reference: 1668 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Oils/Related Products Incident Severity: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 100m	A7SE (SE)	819	2	451900 108200

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
37	<b>Pollution Incidents to Controlled Waters</b> Property Type: Domestic/Residential Location: Brooklands, Bridge Road, SARISBURY Authority: Environment Agency, Southern Region Pollutant: Crude Sewage Note: Fish Kill In Pond Incident Date: 7th May 1996 Incident Reference: 796216 Catchment Area: Not Given Receiving Water: Not Given Cause of Incident: Unknown Incident Severity: Category 2 - Significant Incident Positional Accuracy: Located by supplier to within 100m	A5NW (SW)	958	2	450200 108700
	<b>River Quality</b> Name: Curbridge Strm GQA Grade: River Quality D Reach: Tidal R. Hamble Conf - Park Gate Estimated Distance (km): 6 Flow Rate: Flow less than 0.31 cumecs Flow Type: River Year: 2000	A8NE (E)	835	2	452398 108760
38	<b>Substantiated Pollution Incident Register</b> Authority: Environment Agency - Southern Region, Solent and South Downs Incident Date: 22nd August 2006 Incident Reference: 429385 Water Impact: Category 2 - Significant Incident Air Impact: Category 4 - No Impact Land Impact: Category 3 - Minor Incident Positional Accuracy: Located by supplier to within 10m Pollutant: Oils And Fuel: Gas And Fuel Oils	A9NE (NW)	386	2	450599 109496
39	<b>Water Abstractions</b> Operator: Mr V Goodfellow Esq Licence Number: 11/42/25.9/44 Permit Version: 100 Location: Midfield Nursery Authority: Environment Agency, Southern Region Abstraction: Agriculture: Horticultural Watering Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 23rd December 1965 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 100m	A14SE (N)	398	2	451190 109800
40	<b>Water Abstractions</b> Operator: Land & Water Services Limited Licence Number: So/042/0030/001 Permit Version: 1 Location: Lower Swanwick Borehole Authority: Environment Agency, Southern Region Abstraction: Sports Grounds/Facilities: General Use (Medium Loss) Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: Andark Diving Lake, Lower Swanwick Authorised Start: 27 March Authorised End: 22 April Permit Start Date: 27th March 2013 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 10m	A9NW (W)	970	2	449985 109203

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
	<b>Water Abstractions</b> Operator: A J Cardigan Esq Licence Number: 11/42/25.8/42 Permit Version: 100 Location: Birch Glade, Hill Coppice Authority: Environment Agency, Southern Region Abstraction: General Farming And Domestic Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 23rd December 1965 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 100m	(E)	1314	2	452840 108580
	<b>Water Abstractions</b> Operator: John Willment Marine Limited Licence Number: 30/043ca Permit Version: 102 Location: Crableck Lane Nurseries Authority: Environment Agency, Southern Region Abstraction: Aquaculture: Fish Farm/Cress Pond Throughflow Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 9th June 2017 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 100m	(SW)	1764	2	449500 108300
	<b>Water Abstractions</b> Operator: J R G Purkiss Licence Number: 30/043ca Permit Version: 101 Location: Crableck Lane Nurseries Authority: Environment Agency, Southern Region Abstraction: Aquaculture: Fish Farm/Cress Pond Throughflow Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 31st March 2016 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 100m	(SW)	1764	2	449500 108300
	<b>Water Abstractions</b> Operator: J R G Purkiss Licence Number: 30/043ca Permit Version: 100 Location: Crableck Lane Nurseries Authority: Environment Agency, Southern Region Abstraction: Aquaculture: Fish Farm/Cress Pond Throughflow Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): 172 Yearly Rate (m3): 62780 Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 24th June 2004 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 10m	(SW)	1764	2	449500 108300



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
	<b>Water Abstractions</b> Operator: S B P Management Ltd Licence Number: 30/044 Permit Version: 100 Location: Whiteley, Fareham Authority: Environment Agency, Southern Region Abstraction: Private Non-Industrial Amenity: Spray Irrigation - Direct Abstraction Type: Water may be abstracted from a single point Source: Surface Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 April Authorised End: 31 October Permit Start Date: 1st April 2016 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 10m	(E)	1804	2	453400 109400
	<b>Water Abstractions</b> Operator: S B P Management Ltd Licence Number: 30/044 Permit Version: 100 Location: Whiteley, Fareham Authority: Environment Agency, Southern Region Abstraction: Private Non-Industrial Amenity: Make-Up Or Top Up Water Abstraction Type: Water may be abstracted from a single point Source: Surface Daily Rate (m3): 218 Yearly Rate (m3): 7500 Details: See Licence Map Authorised Start: 01 April Authorised End: 31 October Permit Start Date: 1st April 2016 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 10m	(E)	1804	2	453400 109400
	<b>Water Abstractions</b> Operator: Messrs Game Bros Licence Number: 11/42/25.10/49 Permit Version: 100 Location: Brixedone Farm Wishing Well Authority: Environment Agency, Southern Region Abstraction: General Farming And Domestic Abstraction Type: Water may be abstracted from a single point Source: Groundwater Daily Rate (m3): Not Supplied Yearly Rate (m3): Not Supplied Details: See Licence Map Authorised Start: 01 January Authorised End: 31 December Permit Start Date: 23rd December 1965 Permit End Date: Not Supplied Positional Accuracy: Located by supplier to within 100m	(NW)	1982	2	449470 110650
	<b>Groundwater Vulnerability</b> Soil Classification: Not classified Map Sheet: Sheet 52 Southern Hampshire Scale: 1:100,000	A11NW (NE)	0	2	451293 109179
	<b>Drift Deposits</b> None				
	<b>Bedrock Aquifer Designations</b> Aquifer Designation: Unproductive Strata	A11NW (NE)	0	1	451293 109179
	<b>Superficial Aquifer Designations</b> No Data Available				
	<b>Extreme Flooding from Rivers or Sea without Defences</b> None				
	<b>Flooding from Rivers or Sea without Defences</b> None				
	<b>Areas Benefiting from Flood Defences</b> None				
	<b>Flood Water Storage Areas</b> None				
	<b>Flood Defences</b> None				

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
41	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 52.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (E)	0	4	451578 109084
42	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 60.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NW (NE)	9	4	451355 109295
43	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 46.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NE (W)	20	4	450994 109197
44	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 239.3 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NE (W)	62	4	450957 109183
45	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	87	4	451302 108952
46	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 20.3 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	91	4	451301 108949
47	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 1.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	110	4	451297 108929
48	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.2 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	112	4	451297 108927
49	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 43.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	116	4	451297 108922

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
50	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 120.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (NW)	134	4	450862 109432
51	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.5 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	157	4	451292 108880
52	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 87.2 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SW (S)	161	4	451289 108877
53	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 50.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (NW)	230	4	450745 109438
54	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.4 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6NE (S)	244	4	451280 108791
55	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 11.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6NE (S)	249	4	451280 108786
56	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 75.6 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (E)	257	4	451868 109182
57	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 4.4 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (E)	257	4	451869 109178
58	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 37.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A11SE (E)	260	4	451873 109172

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
59	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 39.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (E)	261	4	451873 109176
60	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 251.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SE (E)	266	4	451856 108989
61	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 50.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	268	4	450718 109190
62	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 39.9 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (NW)	270	4	450697 109430
63	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 351.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A14SE (N)	274	4	451120 109672
64	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 89.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SE (E)	293	4	451908 109157
65	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 25.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	296	4	450662 109410
66	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 92.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	307	4	450669 109198
67	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 12.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	312	4	450642 109395

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
68	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 23.2 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	320	4	450632 109387
69	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 19.7 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11SE (E)	336	4	451950 109100
70	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 30.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A10NW (W)	336	4	450613 109373
71	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 55.6 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	348	4	451960 109083
72	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 111.8 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A9NE (W)	359	4	450589 109355
73	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.4 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	360	4	451829 109423
74	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 40.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	360	4	451831 109421
75	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 12.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	361	4	451829 109423
76	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 198.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12SW (E)	369	4	451984 109159

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
77	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 33.9 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	371	4	451830 109435
78	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 99.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A9NE (W)	372	4	450586 109240
79	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 49.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	390	4	451871 109428
80	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 188.1 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A14SE (NW)	401	4	450949 109767
81	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 86.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	402	4	452011 109061
82	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 42.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (NE)	405	4	451846 109464
83	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 56.2 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (E)	406	4	451918 109416
84	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 140.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A11NE (E)	406	4	451947 109368
85	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 10.9 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	423	4	452035 109183



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
86	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 37.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	433	4	452046 109185
87	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 632.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A9NE (W)	449	4	450500 109288
88	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 17.2 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	476	4	452063 109295
89	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.7 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	479	4	452080 109016
90	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 2.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	482	4	452085 109019
91	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 154.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	485	4	452087 109021
92	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 47.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	493	4	452080 109297
93	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.3 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	534	4	452126 109287
94	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 17.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	536	4	452130 109286

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
95	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 135.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	551	4	452146 109282
96	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 159.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	551	4	452146 109282
97	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 879.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A14NW (NW)	572	4	450825 109909
98	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 91.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	600	4	451862 109683
99	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 10.2 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	600	4	452215 109102
100	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 94.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	609	4	452224 109108
101	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 18.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	649	4	452251 109264
102	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 0.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	653	4	452252 109275
103	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.7 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	653	4	452253 109275

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
104	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 7.4 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	655	4	452257 109266
105	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 21.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5NE (SW)	655	4	450559 108712
106	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 4.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	659	4	452258 109277
107	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.5 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	662	4	452265 109266
108	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 109.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	662	4	452262 109275
109	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 9.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	662	4	452262 109275
110	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 53.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	663	4	452266 109262
111	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 284.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	666	4	451788 109810
112	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 10.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	667	4	452279 109194

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
113	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 46.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	667	4	452279 109194
114	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 35.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NW (E)	667	4	452279 109192
115	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 6.8 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NW (E)	668	4	452280 109204
116	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.7 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	670	4	452285 109155
117	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 8.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SW (E)	674	4	452289 109160
118	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 25.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SE (E)	679	4	452294 109165
119	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 923.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15NW (N)	681	4	451597 109960
120	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 3.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	683	4	451877 109774
121	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 5.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	684	4	451881 109773

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
122	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 12.0 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	686	4	451886 109772
123	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 129.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15SE (NE)	688	4	451897 109766
124	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 33.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A13SE (NW)	697	4	450449 109817
125	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 38.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A13SE (NW)	699	4	450425 109794
126	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 44.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SE (E)	704	4	452318 109169
127	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 652.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A9SE (W)	732	4	450301 108968
128	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 27.9 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5NE (SW)	738	4	450488 108667
129	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 12.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NE (E)	747	4	452361 109177
130	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 50.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6SW (SW)	749	4	450758 108460

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
131	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 115.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 2	A12NE (E)	759	4	452373 109181
132	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 424.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12NE (E)	759	4	452373 109181
133	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 17.0 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5NE (SW)	765	4	450465 108653
134	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 177.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15NE (NE)	777	4	451836 109906
135	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 21.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6SW (SW)	777	4	450771 108424
136	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 9.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5NE (SW)	782	4	450450 108644
137	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 2.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (SE)	784	4	452304 108652
138	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 299.3 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5NE (SW)	792	4	450442 108638
139	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 59.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6SW (SW)	796	4	450755 108410



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
140	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 150.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A16SW (NE)	802	4	451999 109836
141	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 261.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (E)	819	4	452371 108739
142	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 253.9 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (E)	819	4	452371 108739
143	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 130.7 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A6SW (SW)	849	4	450710 108371
144	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 13.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8SE (SE)	879	4	452326 108489
145	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 108.2 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8SE (SE)	883	4	452323 108476
146	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 36.4 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15NE (NE)	900	4	451892 110015
147	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 7.0 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15NE (NE)	905	4	451923 110004
148	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 73.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A15NE (NE)	906	4	451930 110003

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
149	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 2.0 Watercourse Level: Underground Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A16NW (NE)	919	4	451998 109977
150	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 123.5 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A16NW (NE)	920	4	452000 109977
151	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 101.0 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A16NW (NE)	940	4	452114 109929
152	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 213.2 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A5SE (SW)	951	4	450599 108312
153	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 126.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (E)	975	4	452536 108752
154	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 161.3 Watercourse Level: Not Supplied Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (E)	975	4	452531 108736
155	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 111.3 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A12SE (E)	979	4	452564 108890
156	<b>OS Water Network Lines</b> Watercourse Form: Inland river Watercourse Length: 17.1 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (SE)	992	4	452495 108569
157	<b>OS Water Network Lines</b> Watercourse Form: Lake Watercourse Length: 31.8 Watercourse Level: On ground surface Permanent: True Watercourse Name: Not Supplied Catchment Name: East Hampshire Primacy: 1	A8NE (SE)	994	4	452494 108563

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
158	<b>Historical Landfill Sites</b> Licence Holder: Civil Aviation Authority Location: Bursledon Brickworks, Swanwick, Hampshire Name: Land at Bursledon Brickworks Operator Location: Not Supplied Boundary Accuracy: As Supplied Provider Reference: EAHLD20946 First Input Date: Not Supplied Last Input Date: Not Supplied Specified Waste: Deposited Waste included Inert Waste Type: EA Waste Ref: 0 Regis Ref: Not Supplied WRC Ref: Not Supplied BGS Ref: Not Supplied Other Ref: 10/42, FFA25	A14NE (N)	536	2	450993 109923
159	<b>Licensed Waste Management Facilities (Landfill Boundaries)</b> Name: Rookery Farm Landfill Site Licence Number: 210063 Location: Rookery Farm Landfill Site, Botley Road, Swanwick, Fareham, Hampshire, SO31 1BL Licence Holder: Raymond Brown Minerals & Recycling Ltd Authority: Environment Agency - South East Region, Solent & South Downs Area Site Category: Inert LF Max Input Rate: Not Supplied <b>Licence Status: Modified</b> Issued: 9th November 2005 Positional Accuracy: Positioned by the supplier Boundary Accuracy: As Supplied	A11NW (NE)	0	2	451293 109179
160	<b>Licensed Waste Management Facilities (Landfill Boundaries)</b> Name: Rookery Farm Landfill Site Licence Number: 10281 Location: Rookery Farm, Botley Road, Swanwick, Hants, SO31 1BL Licence Holder: Raymond Brown Eco Bio Ltd Authority: Environment Agency - Southern Region, Hampshire and Isle of Wight Area Office Site Category: Landfills Taking Non-biodegradable Wastes (Not Construction) Max Input Rate: Not Supplied <b>Licence Status: Inactive</b> Issued: 9th November 2005 Positional Accuracy: Positioned by the supplier Boundary Accuracy: As Supplied	A11NW (NE)	0	2	451293 109179
161	<b>Licensed Waste Management Facilities (Landfill Boundaries)</b> Name: Rookery Farm Landfill Site And Recycling Licence Number: 19941 Location: Rookery Farm, Botley Road, Swanwick, Hampshire, SO31 1BL Licence Holder: Raymond Brown Eco-Bio Ltd Authority: Environment Agency - Southern Region, Hampshire and Isle of Wight Area Office Site Category: Household, Commercial And Industrial Waste Landfills Max Input Rate: Not Supplied <b>Licence Status: Inactive</b> Issued: Not Supplied Positional Accuracy: Positioned by the supplier Boundary Accuracy: As Supplied	A11NW (NE)	0	2	451293 109179
162	<b>Licensed Waste Management Facilities (Locations)</b> Licence Number: 10281 Location: Rookery Farm, Botley Road, Swanwick, Hampshire, SO31 1BL Operator Name: Raymond Brown Eco Bio Ltd Operator Location: Not Supplied Authority: Environment Agency - South East Region, Solent & South Downs Area Site Category: Landfills Taking Non-biodegradable Wastes (Not Construction) <b>Licence Status: Issued</b> Issued: 9th November 2005 Last Modified: Not Supplied Expires: Not Supplied Suspended: Not Supplied Revoked: Not Supplied Surrendered: Not Supplied IPPC Reference: MP3239BR Positional Accuracy: Located by supplier to within 10m	A11SW (SE)	0	2	451400 109110

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
162	<b>Licensed Waste Management Facilities (Locations)</b> Licence Number: 19941 Location: Rookery Farm, Botley Road, Swanwick, Fareham, Hampshire, SO31 1BL Operator Name: Raymond Brown Minerals & Recycling Ltd Operator Location: Not Supplied Authority: Environment Agency - Southern Region, Solent and South Downs Site Category: Physical Treatment Facilities <b>Licence Status: Modified</b> Issued: 11th May 1995 Last Modified: 24th October 2016 Expires: Not Supplied Suspended: Not Supplied Revoked: Not Supplied Surrendered: Not Supplied IPPC Reference: Not Supplied Positional Accuracy: Located by supplier to within 10m	A11SW (SE)	0	2	451400 109110
163	<b>Licensed Waste Management Facilities (Locations)</b> Licence Number: 210063 Location: Rookery Farm Landfill Site, Botley Road, Swanwick, Fareham, Hampshire, SO31 1BL Operator Name: Raymond Brown Minerals & Recycling Ltd Operator Location: Not Supplied Authority: Environment Agency - South East Region, Solent & South Downs Area Site Category: Inert LF <b>Licence Status: Modified</b> Issued: 9th November 2005 Last Modified: 24th October 2016 Expires: Not Supplied Suspended: Not Supplied Revoked: Not Supplied Surrendered: Not Supplied IPPC Reference: Not Supplied Positional Accuracy: Located by supplier to within 100m	A10NE (W)	0	2	451100 109200
164	<b>Licensed Waste Management Facilities (Locations)</b> Licence Number: 10211 Location: 6 Crompton Way, Segensworth West Ind Est, Fareham, Hampshire, PO15 5SP Operator Name: Rentokil Initial U K Limited Operator Location: Not Supplied Authority: Environment Agency - South East Region, Solent & South Downs Area Site Category: Special Waste Transfer Stations <b>Licence Status: Modified</b> Issued: 21st May 1999 Last Modified: 15th August 2014 Expires: Not Supplied Suspended: Not Supplied Revoked: Not Supplied Surrendered: Not Supplied IPPC Reference: Not Supplied Positional Accuracy: Located by supplier to within 10m	A8SW (SE)	913	2	452249 108332
165	<b>Licensed Waste Management Facilities (Locations)</b> Licence Number: 10255 Location: Mobile Plant Operator Name: Westminster Dredging Company Limited Operator Location: Not Supplied Authority: Environment Agency - South East Region, Solent & South Downs Area Site Category: Mobile Plant <b>Licence Status: Modified</b> Issued: 8th December 2004 Last Modified: 10th April 2006 Expires: Not Supplied Suspended: Not Supplied Revoked: Not Supplied Surrendered: Not Supplied IPPC Reference: Not Supplied Positional Accuracy: Located by supplier to within 10m	A8SW (SE)	983	2	452264 108247
	<b>Local Authority Landfill Coverage</b> Name: Fareham Borough Council - Has no landfill data to supply		0	3	451293 109179
	<b>Local Authority Landfill Coverage</b> Name: Hampshire County Council - Had landfill data but passed it to the relevant environment agency		0	5	451293 109179
	<b>Local Authority Landfill Coverage</b> Name: Winchester City Council - Has supplied landfill data		797	6	452397 109289

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
166	<b>Registered Landfill Sites</b> Licence Holder: Raymond Brown Eco Bio Ltd Licence Reference: FA 032A Site Location: Rookery Farm, Botley Road, Swanwick, SOUTHAMPTON, Hampshire, SO31 1BL Licence Easting: 451250 Licence Northing: 109200 Operator Location: 160 Christchurch Road, RINGWOOD, Hampshire, BH24 3AR Authority: Environment Agency - Southern Region, Hampshire Area Site Category: Landfill - with treatment Max Input Rate: Very Large (Equal to or greater than 250,000 tonnes per year) Waste Source: No known restriction on source of waste Restrictions: Status: Operational as far as is known Dated: 11th May 1995 Preceded By: 10/ 32 Licence: Superseded By: Not Given Licence: Positional Accuracy: Manually positioned to the address or location Boundary Accuracy: Not Applicable Authorised Waste Adhesive Wastes Construction And Demolition Wastes Cork Cull,Clays,Pottery,China,Enamels,Ceram Ebonite,Kapok Kieselguhr (Diatom.Earth Electrical Fitt/Fixt/Appliances Ferrous & Non-Ferrous Metals Hants Cat.A - Inert/ Waste For Recycl' Max.Waste Permitted By Licence Natural/Manmade Fibres Prods. Of Completed Polymerisation Sand,Chalk,Gravel,Nat.Occ.Earth Spoils Sands (Incl.Foundry/Moulding), Silica Shot Blast/Boiler Scale/Iron Ox/Hydrox Solid Rubber <b>Prohibited Waste</b> All Fibrous Forms Of Asbestos Biodegradable Waste Contam.Heavy Metal/Salts Of Heavy Met. Contaminated Rubble With Concs.>List 1 Food Waste Liquid/Slurry/Sludge Wastes Old Cars/Vehicles/Tractors Paper/Cardboard/Packaging Phenols, Analogues/Derivatives Poisonous, Noxious, Polluting Wastes Potentially Hazardous Wastes Potentially Polluting Wastes Rubble-Ex.Premis.Use Tox/Water Sol.Chem Spec.Waste (Epa'90:S62/1996 Regs) Vegetable Matter Waste N.O.S.	A10NE (NW)	0	2	451250 109200

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
167	<b>Registered Landfill Sites</b> Licence Holder: Leigh Environmental (Southern) Ltd Licence Reference: 10/ 32 Site Location: Rookery Farm, Botley Road, Swanwick, SOUTHAMPTON, Hampshire, SO31 1BL Licence Easting: Not Supplied Licence Northing: Not Supplied Operator Location: Dundas Spur, Dundas Lane, Copnor, PORTSMOUTH, Hampshire, PO3 5NY Authority: Environment Agency - Southern Region, Hampshire Area Site Category: Landfill Max Input Rate: Large (Equal to or greater than 75,000 and less than 250,000 tonnes per year) Waste Source: No known restriction on source of waste Restrictions: Status: Record supersededSuperseded Dated: 7th April 1988 Preceded By: 10/ 30A Licence: Superseded By: FA 032A Licence: Positional Accuracy: Positioned by the supplier Boundary Accuracy: Moderate Authorised Waste: Construction And Demolition Wastes Highways Maintenance Wastes Max.Waste Permitted By Licence(Stated) Sand,Chalk,Gravel,Nat.Occ.Earth Spoils Prohibited Waste: All Fibrous Forms Of Asbestos Biodegradable Waste Contam.Rubble Ex Prems Using Tox/Chems Food Waste Liquid/Sludge Wastes Mat'Ls Cont. Phenols Paper/Cardboard/Packaging Waste Phenols Or Mat'Ls Cont Phenol Poisonous, Noxious, Polluting Wastes Special Wastes Vegetable Matter Waste N.O.S.	A11NW (NE)	0	2	451293 109179
168	<b>Registered Landfill Sites</b> Licence Holder: J & W Landfill Ltd Licence Reference: 10/ 30A Site Location: Rookery Farm, Botley Road, Swanwick, SOUTHAMPTON, Hampshire, SO31 1BL Licence Easting: Not Supplied Licence Northing: Not Supplied Operator Location: Sandy Lane, Fair Oak, Eastleigh, Hampshire Authority: Environment Agency - Southern Region, Hampshire Area Site Category: Landfill Max Input Rate: Undefined Waste Source: No known restriction on source of waste Restrictions: Status: Record supersededSuperseded Dated: 16th November 1984 Preceded By: Not Given Licence: Superseded By: 10/ 32 Licence: Positional Accuracy: Positioned by the supplier Boundary Accuracy: Moderate Authorised Waste: Construction And Demolition Wastes Excavated Natural Materials \$ Foundry Sand Road Making Materials Sands,Silica Prohibited Waste: Biodegradable/Putrescible Waste Contaminated Rubble Fibrous Forms Of Asbestos Food Waste Liquid/Slurry/Sludge Wastes Paper/Cardboard Waste Phenols, Analogues/Derivatives Poisonous, Noxious, Polluting Wastes Special Wastes Toxic/Poisonous Wastes Vegetable/Processing Waste	A10NE (N)	0	2	451281 109231



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
169	<b>Registered Landfill Sites</b> Licence Holder: Civil Aviation Authority Licence Reference: 10/ 42A Site Location: Burlesden Brickworks, Swanwick, Southampton, Hampshire Licence Easting: 450501 Licence Northing: 110001 Operator Location: Caa House, 45-49 Kingsway, LONDON, Greater London, WC2B 6TE Authority: Environment Agency - Southern Region, Hampshire Area Site Category: Landfill Max Input Rate: Undefined Waste Source: No known restriction on source of waste Restrictions: Status: Licence lapsed/cancelled/defunct/not applicable/surrenderedCancelled Dated: 1st June 1991 Preceded By: Not Given Licence: Superseded By: Not Given Licence: Positional Accuracy: Manually positioned to the address or location Boundary Accuracy: Not Applicable Authorised Waste: Sand,Chalk,Gravel,Nat'L Occ.Earthspoil Prohibited Waste: All Clinical Wastes (As In Wmp 25) Biodegradable Waste Brick, Concrete Rubble Constr'N/Demol. Waste Food Liquid/Slurry/Sludge Wastes Metal Paper/Cardboard/Packaging Phenols Or Mat'ls Containing Them Plaster Poisonous, Noxious, Polluting Wastes Rubble -Prems Use Toxic/Water Sol.Chem Special Wastes Timber Vegetable Matter Waste N.O.S.	A13NE (NW)	807	2	450501 110001
170	<b>Registered Waste Transfer Sites</b> Licence Holder: Rentokil Initial Plc Licence Reference: EAWML10211 Site Location: 6 Crompton Way, Segensworth West Industrial Estate, FAREHAM, Hampshire, PO15 5SP Operator Location: Felcourt, EAST GRINSTEAD, West Sussex, RH19 2JY Authority: Environment Agency - Southern Region, Hampshire Area Site Category: Transfer Max Input Rate: Very Small (Less than 10,000 tonnes per year) Waste Source: No known restriction on source of waste Restrictions: Licence Status: Operational as far as is knownOperational Dated: 21st May 1999 Preceded By: Not Given Licence: Superseded By: Not Given Licence: Positional Accuracy: Manually positioned to the address or location Boundary Quality: Not Supplied Authorised Waste: Maximum Waste Permitted By Licence Soiled Nappies Soiled Sanitary Dressings Prohibited Waste: Liquid Wastes Material With Any Haz.Code (H1, H2, H3a,H3b,H4,H5,H6,H7,H8,H9,H10,H11,H12,H13,H14) Powders Sludge Wastes Special Waste (As In Epa 1990:S62 Of 1996 Regs) Waste Not Otherwise Specified	A8SW (SE)	902	2	452250 108350

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
	<b>BGS 1:625,000 Solid Geology</b> Description: Thames Group	A11NW (NE)	0	1	451293 109179
171	<b>BGS Recorded Mineral Sites</b> Site Name: Beacon Bottom Clay Pits Location: Sarisbury, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162944 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A11SE (SE)	64	1	451641 108934
172	<b>BGS Recorded Mineral Sites</b> Site Name: Beacon Bottom Clay Pits Location: Sarisbury, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162943 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A11SW (SE)	73	1	451616 108890
173	<b>BGS Recorded Mineral Sites</b> Site Name: Beacon Bush Hill Clay Pit Location: Sarisbury, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162930 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Ypresian - Lutetian Geology: Wittering Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A7NW (S)	338	1	451501 108612
174	<b>BGS Recorded Mineral Sites</b> Site Name: Park Gate Brick Kilns Location: Park Gate, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162964 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A7NE (SE)	408	1	451832 108633
175	<b>BGS Recorded Mineral Sites</b> Site Name: Sarisbury Brick & Tile Works Location: Sarisbury, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162929 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A9NW (W)	897	1	450063 109176

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
176	<b>BGS Recorded Mineral Sites</b> Site Name: Swanwick Brick Works Location: Swanwick, Southampton, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162505 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A13NW (NW)	923	1	450191 109858
177	<b>BGS Recorded Mineral Sites</b> Site Name: Sarisbury Brick & Tile Works Location: Sarisbury, Fareham, Hampshire Source: British Geological Survey, National Geoscience Information Service Reference: 162942 Type: Opencast <b>Status: Ceased</b> Operator: Not Supplied Operator Location: Not Supplied Periodic Type: Palaeogene Geology: London Clay Formation Commodity: Common Clay and Shale Positional Accuracy: Located by supplier to within 10m	A9NW (W)	977	1	449972 109261
	<b>Coal Mining Affected Areas</b> In an area that might not be affected by coal mining				
	<b>Non Coal Mining Areas of Great Britain</b> No Hazard				
	<b>Potential for Collapsible Ground Stability Hazards</b> Hazard Potential: Very Low Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Potential for Compressible Ground Stability Hazards</b> Hazard Potential: No Hazard Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Potential for Ground Dissolution Stability Hazards</b> Hazard Potential: No Hazard Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Very Low Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A11NW (SE)	0	1	451297 109175
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Moderate Source: British Geological Survey, National Geoscience Information Service	A11SW (SE)	0	1	451528 108963
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Moderate Source: British Geological Survey, National Geoscience Information Service	A11SW (S)	0	1	451290 109093
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Moderate Source: British Geological Survey, National Geoscience Information Service	A11SW (E)	0	1	451366 109160
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A10SE (SW)	75	1	451077 109049
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A11SE (E)	160	1	451753 109014
	<b>Potential for Landslide Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	176	1	451428 109454
	<b>Potential for Running Sand Ground Stability Hazards</b> Hazard Potential: No Hazard Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
	<b>Potential for Running Sand Ground Stability Hazards</b> Hazard Potential: Very Low Source: British Geological Survey, National Geoscience Information Service	A10SE (SW)	115	1	451085 109006
	<b>Potential for Running Sand Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	231	1	451506 109453
	<b>Potential for Shrinking or Swelling Clay Ground Stability Hazards</b> Hazard Potential: Low Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Potential for Shrinking or Swelling Clay Ground Stability Hazards</b> Hazard Potential: Moderate Source: British Geological Survey, National Geoscience Information Service	A10SE (SW)	115	1	451085 109006
	<b>Radon Potential - Radon Affected Areas</b> Affected Area: The property is in a Lower probability radon area (less than 1% of homes are estimated to be at or above the Action Level). Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179
	<b>Radon Potential - Radon Protection Measures</b> Protection Measure: No radon protective measures are necessary in the construction of new dwellings or extensions Source: British Geological Survey, National Geoscience Information Service	A11NW (NE)	0	1	451293 109179

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
178	<b>Contemporary Trade Directory Entries</b> Name: Ecobio Ltd Location: Botley Rd, Park Gate, Southampton, Hampshire, SO31 1BB Classification: Recycling Centres <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the road within the address or location	A11SW (SE)	10	-	451602 109026
179	<b>Contemporary Trade Directory Entries</b> Name: P R O Cars Southampton Ltd Location: 83, Swanwick Lane, Swanwick, SOUTHAMPTON, SO31 7DX Classification: Car Dealers <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A10NW (W)	93	-	450858 109302
180	<b>Contemporary Trade Directory Entries</b> Name: Burridge Body Shop Location: Unit 3 116 Botley rd, Park Gate, Southampton, Hampshire, SO31 1BA Classification: Car Body Repairs <b>Status:</b> Active Positional Accuracy: Manually positioned to the address or location	A7NE (SE)	143	-	451641 108824
180	<b>Contemporary Trade Directory Entries</b> Name: Flintstone Tyres Location: Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Tyre Dealers <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	143	-	451642 108825
181	<b>Contemporary Trade Directory Entries</b> Name: H H Aluminium Location: Unit 1-3, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Aluminium Fabricators <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	170	-	451690 108824
181	<b>Contemporary Trade Directory Entries</b> Name: Glass Processing Services Location: Unit 3, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Glass Products - Manufacturers <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	176	-	451683 108812
181	<b>Contemporary Trade Directory Entries</b> Name: Beacon Joinery Location: Unit 7, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Joinery Manufacturers <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	179	-	451704 108825
181	<b>Contemporary Trade Directory Entries</b> Name: In House Encapsulation Location: Unit 6, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, Hampshire, SO31 1FQ Classification: Lamination & Encapsulation Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	184	-	451699 108814
181	<b>Contemporary Trade Directory Entries</b> Name: Speedy Pack Location: Unit 8, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Packaging & Wrapping Equipment & Supplies <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	188	-	451717 108825
181	<b>Contemporary Trade Directory Entries</b> Name: Gilmark Fire Protection Services Location: Unit 8, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, Hampshire, SO31 1FQ Classification: Firefighting Equipment <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the address or location	A7NE (SE)	188	-	451717 108825

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
181	<b>Contemporary Trade Directory Entries</b> Name: Comar Services Ltd Location: Unit 9, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Air Conditioning & Refrigeration Contractors <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	194	-	451723 108822
182	<b>Contemporary Trade Directory Entries</b> Name: N F Refrigeration Services Location: Unit 12, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Refrigeration Equipment - Commercial <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	254	-	451787 108807
182	<b>Contemporary Trade Directory Entries</b> Name: Greencool Refrigerants Location: Unit 12, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Refrigeration Equipment - Commercial <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	254	-	451787 108807
182	<b>Contemporary Trade Directory Entries</b> Name: Burrige Motorworks Location: Bridge House, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Garage Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	263	-	451780 108783
182	<b>Contemporary Trade Directory Entries</b> Name: Station Garage Location: Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Garage Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	263	-	451780 108783
182	<b>Contemporary Trade Directory Entries</b> Name: Burrige Motorworks Location: Bridge House, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Garage Services <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	263	-	451780 108783
183	<b>Contemporary Trade Directory Entries</b> Name: New Park Garage Southampton Ltd Location: Unit 5, Station Industrial Park, Duncan Road, Park Gate, Southampton, SO31 1BX Classification: Garage Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	257	-	451635 108703
183	<b>Contemporary Trade Directory Entries</b> Name: Selden Masts Location: Duncan Road, Park Gate, Southampton, Hampshire, SO31 1BX Classification: Marine Equipment & Supplies <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	264	-	451658 108702
183	<b>Contemporary Trade Directory Entries</b> Name: New Park Garage Location: Unit 5, Station Industrial Park, Duncan Road, Park Gate, Southampton, Hampshire, SO31 1BX Classification: Garage Services <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	264	-	451658 108702
183	<b>Contemporary Trade Directory Entries</b> Name: Botley Motor Body Repair Location: Unit 3, Station Industrial Park, Duncan Road, Park Gate, Southampton, SO31 1BX Classification: Car Body Repairs <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	272	-	451672 108698



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
184	<b>Contemporary Trade Directory Entries</b> Name: Swisslog Healthcare Location: Unit 14, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, Hampshire, SO31 1FQ Classification: Automation Systems & Equipment <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	270	-	451802 108800
184	<b>Contemporary Trade Directory Entries</b> Name: Commercial Lighting Systems Ltd Location: Unit 16/17, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Lighting Manufacturers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	305	-	451835 108786
184	<b>Contemporary Trade Directory Entries</b> Name: Moorland Pneumatic Services Location: Unit 16/17, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, Hampshire, SO31 1FQ Classification: Pneumatic Systems & Equipment <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A7NE (SE)	305	-	451835 108786
185	<b>Contemporary Trade Directory Entries</b> Name: Sesotec Location: Unit 24, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Plant & Machinery Manufacturers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	280	-	451775 108753
186	<b>Contemporary Trade Directory Entries</b> Name: E Evans Electrical Contractors Location: 172, Botley Road, Burridge, Southampton, SO31 1BL Classification: Electrical Engineers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A15SW (N)	290	-	451421 109610
187	<b>Contemporary Trade Directory Entries</b> Name: T S L Hygienic Ltd Location: Lathkill House, Beacon Bottom, Park Gate, Southampton, SO31 7GQ Classification: Industrial Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NW (S)	293	-	451471 108663
188	<b>Contemporary Trade Directory Entries</b> Name: Trans-Ec European Ltd Location: Richmond Court, 94, Botley Road, Park Gate, Southampton, Hampshire, SO31 1BA Classification: Road Haulage Services <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A7NW (SE)	303	-	451591 108648
189	<b>Contemporary Trade Directory Entries</b> Name: Hamble Sheet Metal Workers Ltd Location: Unit 23, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Sheet Metal Work <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	306	-	451801 108743
189	<b>Contemporary Trade Directory Entries</b> Name: B S T Engineering Location: Unit 23, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, Hampshire, SO31 1FQ Classification: Sheet Metal Work <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	306	-	451801 108743
189	<b>Contemporary Trade Directory Entries</b> Name: Navigair Ltd Location: Unit 22, Park Gate Business Centre, Chandlers Way, Park Gate, Southampton, SO31 1FQ Classification: Footwear Manufacturers & Wholesale <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	334	-	451828 108729

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
190	<b>Contemporary Trade Directory Entries</b> Name: Full Steam Ahead Location: 45, Botley Road, Park Gate, Southampton, SO31 1AZ Classification: Ironing & Home Laundry Services <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NW (SE)	312	-	451549 108635
190	<b>Contemporary Trade Directory Entries</b> Name: Cleaning Operations Uk Ltd Location: Sherendon House, 43, Botley Road, Park Gate, Southampton, SO31 1AY Classification: Commercial Cleaning Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NW (SE)	346	-	451553 108601
190	<b>Contemporary Trade Directory Entries</b> Name: Richard Mitchell Car Sales Location: Sherendon House, 43, Botley Road, Park Gate, Southampton, SO31 1AY Classification: Car Dealers <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NW (SE)	346	-	451553 108601
190	<b>Contemporary Trade Directory Entries</b> Name: Cleaning Matters 2 Us Ltd Location: Sherendon House, 43, Botley Road, Park Gate, Southampton, Hampshire, SO31 1AY Classification: Commercial Cleaning Services <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the address or location	A7NW (SE)	346	-	451553 108601
190	<b>Contemporary Trade Directory Entries</b> Name: A M V 3000 Location: 82-84, Botley Road, Park Gate, Southampton, SO31 1BA Classification: Classic Car Specialists <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NW (SE)	359	-	451602 108592
190	<b>Contemporary Trade Directory Entries</b> Name: Rosso Ferrari Location: 84, Botley Road, Park Gate, Southampton, Hampshire, SO31 1BA Classification: Car Dealers <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the address or location	A7NW (SE)	359	-	451602 108592
191	<b>Contemporary Trade Directory Entries</b> Name: S K Cladding Location: 8, Suffolk Drive, Whiteley, FAREHAM, Hampshire, PO15 7DE Classification: Cladding Suppliers & Installers <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A11NE (E)	314	-	451827 109365
192	<b>Contemporary Trade Directory Entries</b> Name: Carters Of Swanwick Location: Duncan Road, Park Gate, Southampton, SO31 1BD Classification: Lawnmowers & Garden Machinery - Sales & Service <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	326	-	451742 108671
192	<b>Contemporary Trade Directory Entries</b> Name: Pressing Needs Ltd Location: Duncan Road, Park Gate, Southampton, SO31 1BD Classification: Ironing & Home Laundry Services <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	349	-	451769 108660
193	<b>Contemporary Trade Directory Entries</b> Name: Progressive Product Developments Ltd Location: 24, Beacon Bottom, Park Gate, Southampton, SO31 7GQ Classification: Waste Processing Machinery <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NW (S)	327	-	451361 108669
194	<b>Contemporary Trade Directory Entries</b> Name: Keyline Builders Merchants Location: Duncan Road, Park Gate, Southampton, SO31 1BX Classification: Builders' Merchants <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	332	-	451687 108639

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
195	<b>Contemporary Trade Directory Entries</b> Name: Hampshire Maids Location: 3, Castilian Way, Whiteley, Fareham, Hampshire, PO15 7NR Classification: Cleaning Services - Domestic <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A11SE (E)	344	-	451946 109031
196	<b>Contemporary Trade Directory Entries</b> Name: Lema Electronics Ltd Location: 1, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Electronic Equipment - Manufacturers & Assemblers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	384	-	451738 108603
196	<b>Contemporary Trade Directory Entries</b> Name: Good Directions Ltd Location: 11-15, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Clocks & Watches - Manufacturers & Wholesalers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	388	-	451693 108583
196	<b>Contemporary Trade Directory Entries</b> Name: B K Automation Location: 4, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Automation Systems & Equipment <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	407	-	451734 108577
196	<b>Contemporary Trade Directory Entries</b> Name: Admiral Tapes Ltd Location: Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Packaging & Wrapping Equipment & Supplies <b>Status: Inactive</b> Positional Accuracy: Automatically positioned in the proximity of the address	A7NE (SE)	411	-	451709 108564
196	<b>Contemporary Trade Directory Entries</b> Name: P S P Location: Talisman Business Centre, Duncan Road, Fareham, SO31 7GA Classification: Marine Equipment & Supplies <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	411	-	451709 108564
196	<b>Contemporary Trade Directory Entries</b> Name: Giro Engineering Ltd Location: 10, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Marine Engineers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	425	-	451707 108549
197	<b>Contemporary Trade Directory Entries</b> Name: Air Control Southern Location: 3, Barley Business Park, Duncan Road, Park Gate, Southampton, SO31 1ZT Classification: Air Conditioning & Refrigeration Contractors <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	386	-	451818 108649
197	<b>Contemporary Trade Directory Entries</b> Name: I D C Electrical Southern Ltd Location: 3 Barley Business Park, Duncan Road, Park Gate, Southampton, SO31 1ZT Classification: Electrical Engineers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	388	-	451803 108636
198	<b>Contemporary Trade Directory Entries</b> Name: Metaltech Consulting Services Location: 2, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Engineering Materials <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7NE (SE)	391	-	451743 108598
198	<b>Contemporary Trade Directory Entries</b> Name: Precision Plasma Profiles Ltd Location: Duncan Rd, Park Gate, Southampton, SO31 1ZT Classification: Engineers - General <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the road within the address or location	A7NE (SE)	409	-	451772 108592

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
198	<b>Contemporary Trade Directory Entries</b> Name: G E Energy Rentals Location: Duncan Rd, Park Gate, Southampton, SO31 1BX Classification: Generators - Sales & Service <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the road within the address or location	A7NE (SE)	418	-	451778 108586
199	<b>Contemporary Trade Directory Entries</b> Name: Peterkin & Son Location: 76-82, Botley Road, Park Gate, Southampton, SO31 7ZP Classification: Hardware <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NW (SE)	407	-	451614 108546
200	<b>Contemporary Trade Directory Entries</b> Name: Fireside Bliss Location: Catherine Cottage, Addison Road, Sarisbury Green, Southampton, SO31 7ER Classification: Fireplaces & Mantelpieces <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A6NW (SW)	420	-	450823 108794
201	<b>Contemporary Trade Directory Entries</b> Name: Lloyd Sellen Cleaning Location: 5, Theo House, Bastins Close, Park Gate, Southampton, SO31 1DY Classification: Carpet, Curtain & Upholstery Cleaners <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	444	-	451678 108521
201	<b>Contemporary Trade Directory Entries</b> Name: Lloyd Sellen Carpet & Upholstery Cleaning Location: 5, Theo House, Bastins Close, Park Gate, Southampton, SO31 1DY Classification: Carpet, Curtain & Upholstery Cleaners <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	444	-	451678 108521
201	<b>Contemporary Trade Directory Entries</b> Name: Whiteley Cleaning Ltd Location: 5, Theo House, Bastins Close, Park Gate, Southampton, Hampshire, SO31 1DY Classification: Carpet, Curtain & Upholstery Cleaners <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	444	-	451678 108521
202	<b>Contemporary Trade Directory Entries</b> Name: Hounsham Mechanical Services Location: 8, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Air Conditioning & Refrigeration Contractors <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	448	-	451747 108538
202	<b>Contemporary Trade Directory Entries</b> Name: M O J Engineering Ltd Location: 9, Talisman Business Centre, Duncan Road, Park Gate, Southampton, SO31 7GA Classification: Precision Engineers <b>Status:</b> Inactive Positional Accuracy: Automatically positioned to the address	A7NE (SE)	448	-	451747 108538
202	<b>Contemporary Trade Directory Entries</b> Name: M O J Engineering Location: 9, Talisman Business Centre, Duncan Road, Park Gate, Southampton, Hampshire, SO31 7GA Classification: Precision Engineers <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	448	-	451747 108538
202	<b>Contemporary Trade Directory Entries</b> Name: Vectron Ltd Location: Duncan Rd, Park Gate, Southampton, SO31 1BD Classification: Sheet Metal Work <b>Status:</b> Inactive Positional Accuracy: Manually positioned to the road within the address or location	A7NE (SE)	465	-	451796 108542
202	<b>Contemporary Trade Directory Entries</b> Name: Bassaire Location: Duncan Road, Park Gate, Southampton, SO31 1ZS Classification: Air Purification Equipment <b>Status:</b> Active Positional Accuracy: Automatically positioned to the address	A7NE (SE)	470	-	451767 108522

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
202	<b>Contemporary Trade Directory Entries</b> Name: Cramer Uk Location: Duncan Road, Park Gate, Southampton, Hampshire, SO31 1BD Classification: Lawnmowers & Garden Machinery - Sales & Service <b>Status: Active</b> Positional Accuracy: Manually positioned within the geographical locality	A7SE (SE)	497	-	451751 108487
203	<b>Contemporary Trade Directory Entries</b> Name: Douglas Knight Sunblinds Ltd Location: 31, Station Road, Park Gate, Southampton, SO31 7GJ Classification: Blinds, Awnings & Canopies <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	478	-	451587 108471
203	<b>Contemporary Trade Directory Entries</b> Name: Douglas Knight Sunblinds Ltd Location: 31b, Station Road, Park Gate, Southampton, SO31 7GJ Classification: Blinds, Awnings & Canopies <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	478	-	451587 108471
203	<b>Contemporary Trade Directory Entries</b> Name: New Park Garage (Southampton) Ltd Location: Station Road, Park Gate, Southampton, Hampshire, SO31 7GJ Classification: Car Dealers - Used <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	509	-	451589 108440
204	<b>Contemporary Trade Directory Entries</b> Name: Sparkle Carpets Location: 18, Weybridge Close, Sarisbury Green, SOUTHAMPTON, SO31 7LR Classification: Carpet, Curtain & Upholstery Cleaners <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A6NW (SW)	485	-	450890 108691
204	<b>Contemporary Trade Directory Entries</b> Name: Campbell Sports Cars Location: B, 1, Addison Road, Sarisbury Green, Southampton, SO31 7ER Classification: Car Dealers - Used <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A6NW (SW)	518	-	450854 108670
205	<b>Contemporary Trade Directory Entries</b> Name: A & I Technology Ltd Location: 58d, Botley Road, Park Gate, Southampton, SO31 1BB Classification: Marine Engineering Equipment Manufacturers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	500	-	451657 108460
206	<b>Contemporary Trade Directory Entries</b> Name: I D M Building & Roofing Contractor Location: The Firs, Duncan Road, Park Gate, Southampton, SO31 1BD Classification: Cladding Suppliers & Installers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	527	-	451712 108444
207	<b>Contemporary Trade Directory Entries</b> Name: Tap-Out Location: 34 Station Rd, Park Gate, Southampton, Hampshire, SO31 7HR Classification: Car Body Repairs <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	527	-	451524 108420
208	<b>Contemporary Trade Directory Entries</b> Name: Whelan Location: Webb House, Bridge Road, Park Gate, Southampton, Hampshire, SO31 7GE Classification: Pest & Vermin Control <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	549	-	451407 108415
209	<b>Contemporary Trade Directory Entries</b> Name: Autofinish Location: 5, Camargue Close, Whiteley, Fareham, Hampshire, PO15 7DT Classification: Car Body Repairs <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A15SE (NE)	569	-	451777 109702
210	<b>Contemporary Trade Directory Entries</b> Name: Leech Mechanical Services Ltd Location: 17, Berber Close, Whiteley, Fareham, Hampshire, PO15 7HF Classification: Air Conditioning Equipment & Systems <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A12SW (E)	573	-	452166 108968

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
211	<b>Contemporary Trade Directory Entries</b> Name: F E L Location: 42, Botley Road, Park Gate, Southampton, SO31 1AJ Classification: Electronic Component Manufacturers & Distributors <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	582	-	451708 108386
212	<b>Contemporary Trade Directory Entries</b> Name: The Swanwick Lake Study Centre Location: Sopwith Way, Swanwick, Southampton, Hampshire, SO31 7AY Classification: Sports Equipment Manufacturers & Distributors <b>Status: Inactive</b> Positional Accuracy: Manually positioned within the geographical locality	A13SE (NW)	584	-	450493 109696
213	<b>Contemporary Trade Directory Entries</b> Name: Big Wall Media Ltd Location: 22, Middle Road, Park Gate, Southampton, SO31 7GH Classification: Digital Printing <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	596	-	451617 108356
213	<b>Contemporary Trade Directory Entries</b> Name: Curti Lifts Ltd Location: 22g, Middle Road, Park Gate, Southampton, SO31 7GH Classification: Lift Manufacturers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	612	-	451648 108344
214	<b>Contemporary Trade Directory Entries</b> Name: Status Commercial Cleaning Location: 42, Andalusian Gardens, Whiteley, Fareham, Hampshire, PO15 7DU Classification: Commercial Cleaning Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A15SE (NE)	604	-	451718 109770
215	<b>Contemporary Trade Directory Entries</b> Name: Carland Location: 118, Bridge Road, Sarisbury Green, Southampton, SO31 7EP Classification: Car Dealers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A6NW (SW)	609	-	450628 108707
215	<b>Contemporary Trade Directory Entries</b> Name: S G M Fiat Location: 118, Bridge Road, Sarisbury Green, Southampton, SO31 7EP Classification: Car Dealers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A6NW (SW)	609	-	450628 108707
216	<b>Contemporary Trade Directory Entries</b> Name: County Dry Cleaners Location: 9, Middle Road, Park Gate, Southampton, SO31 7GH Classification: Dry Cleaners <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	617	-	451570 108331
216	<b>Contemporary Trade Directory Entries</b> Name: Southcoast Cleaners Location: 9, Middle Road, Park Gate, Southampton, Hampshire, SO31 7GH Classification: Dry Cleaners <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	617	-	451570 108331
216	<b>Contemporary Trade Directory Entries</b> Name: South Coast Cleaners Location: 9, Middle Road, Park Gate, Southampton, SO31 7GH Classification: Dry Cleaners <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	617	-	451570 108331
217	<b>Contemporary Trade Directory Entries</b> Name: Carland Location: 119 Bridge Rd, Sarisbury Green, Southampton, SO31 7EP Classification: Car Dealers - Used <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the road within the address or location	A6NW (SW)	634	-	450647 108658
218	<b>Contemporary Trade Directory Entries</b> Name: Locks Heath Service Station Location: Bridge Rd, Park Gate, Southampton, Hampshire, SO31 7ZE Classification: Petrol Filling Stations - 24 Hour <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	644	-	451365 108328



Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
218	<b>Contemporary Trade Directory Entries</b> Name: Sparshatts Of Swanwick Location: 79, Bridge Road, Park Gate, Southampton, SO31 7ZE Classification: Car Dealers - Used <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	649	-	451393 108315
218	<b>Contemporary Trade Directory Entries</b> Name: Cars Of Swanwick Ltd Location: 79, Bridge Road, Park Gate, Southampton, SO31 7ZE Classification: Car Dealers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	649	-	451393 108315
218	<b>Contemporary Trade Directory Entries</b> Name: Esso Location: 79, Bridge Road, Park Gate, Southampton, SO31 7ZE Classification: Petrol Filling Stations <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	650	-	451392 108315
218	<b>Contemporary Trade Directory Entries</b> Name: Banks Sails Location: 372, Brook Lane, Sarisbury Green, Southampton, SO31 7ZA Classification: Sailmakers & Repairers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	678	-	451353 108296
218	<b>Contemporary Trade Directory Entries</b> Name: R S Tooling Ltd Location: 368, Brook Lane, Sarisbury Green, Southampton, SO31 7DP Classification: Precision Engineers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	678	-	451353 108296
219	<b>Contemporary Trade Directory Entries</b> Name: Eurolink Catering Equipment Ltd Location: 53, Bridge Road, Park Gate, Southampton, SO31 7GG Classification: Catering Equipment - Servicing & Repairs <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	655	-	451509 108293
219	<b>Contemporary Trade Directory Entries</b> Name: J S Mauldings International Ltd Location: Bridge Rd, Swanwick, Southampton, SO31 7EB Classification: Boatbuilders & Repairers <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the road within the address or location	A7SW (S)	655	-	451556 108292
219	<b>Contemporary Trade Directory Entries</b> Name: Digital Banners Location: 51, Bridge Road, Park Gate, Southampton, Hampshire, SO31 7GG Classification: Printers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SW (S)	665	-	451522 108282
220	<b>Contemporary Trade Directory Entries</b> Name: Indespension Ltd Location: 22-24, Bridge Road, Park Gate, Southampton, SO31 7GE Classification: Trailers & Towing Equipment <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (S)	660	-	451628 108293
220	<b>Contemporary Trade Directory Entries</b> Name: Whelan Pest Prevention Location: Webb House, Bridge Road, Park Gate, Southampton, Hampshire, SO31 7GE Classification: Pest & Vermin Control <b>Status: Active</b> Positional Accuracy: Manually positioned within the geographical locality	A7SE (S)	674	-	451647 108281
221	<b>Contemporary Trade Directory Entries</b> Name: Monarch Marketing Ltd Location: 1 New Local Centre, Yewtree Drive, Whiteley, Fareham, Hampshire, PO15 7LA Classification: Waste Disposal Services <b>Status: Inactive</b> Positional Accuracy: Manually positioned within the geographical locality	A12NW (E)	696	-	452292 109296

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
222	<b>Contemporary Trade Directory Entries</b> Name: Sovereign Motor Co Location: 14-16, Botley Road, Park Gate, Southampton, SO31 1AJ Classification: Car Dealers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	708	-	451793 108279
223	<b>Contemporary Trade Directory Entries</b> Name: Walcon Marine Location: Walcon House, 3, Cockerell Close, Fareham, PO15 5SR Classification: Marine Engineering Equipment Manufacturers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	749	-	452131 108446
224	<b>Contemporary Trade Directory Entries</b> Name: Southern Ropes Uk Ltd Location: 1a, Southampton Road, Park Gate, SOUTHAMPTON, SO31 6BX Classification: Distribution Services <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	757	-	451878 108258
225	<b>Contemporary Trade Directory Entries</b> Name: Driveline Car Sales Location: 4, Botley Road, Park Gate, Southampton, SO31 1AJ Classification: Car Dealers - Used <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	765	-	451822 108228
225	<b>Contemporary Trade Directory Entries</b> Name: Pace Petroleum Bp Location: Petrol Station, 2, Bridge Road, Park Gate, Southampton, SO31 7GE Classification: Petrol Filling Stations <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	778	-	451799 108207
226	<b>Contemporary Trade Directory Entries</b> Name: Rivendale Hospital Location: Rivendale, Coldeast Way, Sarisbury Green, Southampton, SO31 7ZT Classification: Hospitals <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A6SW (SW)	773	-	450812 108412
227	<b>Contemporary Trade Directory Entries</b> Name: Southern Waste Services Ltd Location: 1, Cockerell Close, Fareham, Hampshire, PO15 5SR Classification: Waste Disposal Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	803	-	452146 108384
227	<b>Contemporary Trade Directory Entries</b> Name: Highway Cleansing Ltd Location: 1, Cockerell Close, Fareham, Hampshire, PO15 5SR Classification: Hygiene & Cleansing Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	803	-	452146 108384
228	<b>Contemporary Trade Directory Entries</b> Name: Solent Location: 4, Cockerell Close, Fareham, Hampshire, PO15 5SR Classification: Commercial Vehicle Bodybuilders & Repairers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	836	-	452226 108423
228	<b>Contemporary Trade Directory Entries</b> Name: Scott Bader Co Ltd Location: 2, Cockerell Close, Fareham, Hampshire, PO15 5SR Classification: Glass Fibre Moulding, Materials & Manufacturers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	853	-	452224 108395
228	<b>Contemporary Trade Directory Entries</b> Name: Kayospruce Ltd Location: 2, Cockerell Close, Fareham, Hampshire, PO15 5SR Classification: Distribution Services <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	853	-	452224 108395
229	<b>Contemporary Trade Directory Entries</b> Name: Premier Filtration Location: 220, Locks Road, Locks Heath, Southampton, SO31 6LB Classification: Air Purification Equipment <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A3NW (S)	876	-	451548 108071

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
230	<b>Contemporary Trade Directory Entries</b> Name: Cleaning Solutions Made Simple Location: 34, Northmore Road, Locks Heath, Southampton, SO31 6LX Classification: Cleaning Services - Domestic <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A3NE (S)	894	-	451655 108060
231	<b>Contemporary Trade Directory Entries</b> Name: Voestalpine Signaling Fareham Ltd Location: Unit 1, Fulcrum, 4, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FT Classification: Railway Equipment Manufacturers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	897	-	452471 108835
232	<b>Contemporary Trade Directory Entries</b> Name: Fareham Community Hospital Location: Brook Lane, Sarisbury Green, Southampton, SO31 7DQ Classification: Hospitals <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A6SE (S)	900	-	451064 108170
233	<b>Contemporary Trade Directory Entries</b> Name: H B S Group Southern Location: Unit 9, Fulcrum 1, Solent Way, Whiteley, Fareham, PO15 7FE Classification: Mechanical Engineers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	903	-	452458 108744
233	<b>Contemporary Trade Directory Entries</b> Name: Limo Engineering Location: Unit 9, Fulcrum, 1, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FE Classification: Garage Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	904	-	452458 108739
233	<b>Contemporary Trade Directory Entries</b> Name: C Quip Location: Unit 8, Fulcrum, 1, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FE Classification: Marine Equipment & Supplies <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	918	-	452473 108741
233	<b>Contemporary Trade Directory Entries</b> Name: Onward Trading Co Location: Unit 8, Fulcrum, 1, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FE Classification: Marine Equipment & Supplies <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	918	-	452473 108741
233	<b>Contemporary Trade Directory Entries</b> Name: F D C International Ltd Location: Unit 6, Fulcrum, 1, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FE Classification: Pharmaceutical Manufacturers & Distributors <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	961	-	452516 108734
234	<b>Contemporary Trade Directory Entries</b> Name: Hi Spec Co-Orparation Location: Unit 4, Fulcrum 4, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FT Classification: Electronic Engineers <b>Status: Inactive</b> Positional Accuracy: Manually positioned to the address or location	A12SE (E)	910	-	452504 108934
235	<b>Contemporary Trade Directory Entries</b> Name: Scania Location: 9, Whittle Avenue, Fareham, Hampshire, PO15 5SH Classification: Commercial Vehicle Dealers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	912	-	452136 108231
236	<b>Contemporary Trade Directory Entries</b> Name: Soft Solutions Location: 19, Buchan Avenue, Whiteley, Fareham, Hampshire, PO15 7EU Classification: Water Softeners <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A16SE (NE)	914	-	452315 109720
237	<b>Contemporary Trade Directory Entries</b> Name: Rentokil Property Care Location: 6, Crompton Way, Fareham, Hampshire, PO15 5SP Classification: Commercial Cleaning Services <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	920	-	452255 108329

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
237	<b>Contemporary Trade Directory Entries</b> Name: Peter Cox Location: 6 Crompton Way Segensworth, Fareham, Hampshire, PO15 5SP Classification: Damp & Dry Rot Control <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	920	-	452255 108329
237	<b>Contemporary Trade Directory Entries</b> Name: Rentokil Pest Control Location: 6 Crompton Way, Segensworth, Fareham, Hampshire, PO15 5SP Classification: Pest & Vermin Control <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	920	-	452255 108329
237	<b>Contemporary Trade Directory Entries</b> Name: Rentokil Property Care Location: 6, Crompton Way, Fareham, Hampshire, PO15 5SP Classification: Damp & Dry Rot Control <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	920	-	452255 108329
238	<b>Contemporary Trade Directory Entries</b> Name: Wall 2 Wall Autos Location: 174a, Bridge Road, Sarisbury Green, Southampton, SO31 7EH Classification: Car Dealers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A9SW (W)	928	-	450134 108880
238	<b>Contemporary Trade Directory Entries</b> Name: West End Metal Crafts (1998) Ltd Location: 174-176, Bridge Road, Sarisbury Green, Southampton, SO31 7EH Classification: Sheet Metal Work <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A9SW (W)	928	-	450134 108880
238	<b>Contemporary Trade Directory Entries</b> Name: West End Metalcraft Location: 174-176, Bridge Road, Sarisbury Green, Southampton, SO31 7EH Classification: Sheet Metal Work <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A9SW (W)	928	-	450134 108880
239	<b>Contemporary Trade Directory Entries</b> Name: Hoof & Hound Pet Supplies Location: Unit 3, Sarisbury House, 172, Bridge Road, Sarisbury Green, Southampton, SO31 7EH Classification: Pet Foods & Animal Feeds <b>Status: Inactive</b> Positional Accuracy: Manually positioned within the geographical locality	A5NW (W)	934	-	450165 108813
240	<b>Contemporary Trade Directory Entries</b> Name: Edale Location: Unit 1, Fulcrum, 5, Solent Way, Whiteley, FAREHAM, Hampshire, PO15 7FY Classification: Printing Equipment Manufacturers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A12SE (E)	934	-	452538 108986
241	<b>Contemporary Trade Directory Entries</b> Name: Kingdom Location: Little Park Farm, 11, Little Park Farm Road, Fareham, PO15 5SN Classification: Commercial Cleaning Services <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8SE (SE)	939	-	452340 108402
241	<b>Contemporary Trade Directory Entries</b> Name: Dougland Support Services Ltd Location: Little Park Farm, 11, Little Park Farm Road, Fareham, Hampshire, PO15 5SN Classification: Commercial Cleaning Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SE (SE)	939	-	452340 108402
242	<b>Contemporary Trade Directory Entries</b> Name: Manser Precision Engineering Location: 216, Barnes Lane, Sarisbury Green, Southampton, SO31 7BG Classification: Precision Engineers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A5NW (SW)	943	-	450251 108642

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
242	<b>Contemporary Trade Directory Entries</b> Name: Parmley Graham Ltd Location: 218-220, Barnes Lane, Sarisbury Green, Southampton, SO31 7BG Classification: Automation Systems & Equipment <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A5NW (SW)	944	-	450251 108642
243	<b>Contemporary Trade Directory Entries</b> Name: Mobile Steam Cleaning Services Location: 19, Hunts Pond Road, Park Gate, Southampton, SO31 6QB Classification: Steam Cleaning Services <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A3NE (SE)	963	-	451905 108047
244	<b>Contemporary Trade Directory Entries</b> Name: Tyre Sales & Service Whiteley Ltd Location: Unit 4, Fulcrum, 1, Solent Way, Whiteley, Fareham, Hampshire, PO15 7FE Classification: Garage Services <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	969	-	452539 108804
244	<b>Contemporary Trade Directory Entries</b> Name: Tyreshops Location: Unit 4, Fulcrum 1, Solent Way, Whiteley, Fareham, PO15 7FE Classification: Tyre Dealers <b>Status: Active</b> Positional Accuracy: Automatically positioned to the address	A8NE (E)	971	-	452541 108808
245	<b>Contemporary Trade Directory Entries</b> Name: Nestle Waters Powwow Location: Unit 5e, Dewar Close, FAREHAM, Hampshire, PO15 5UB Classification: Water Coolers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SE (SE)	982	-	452418 108442
246	<b>Contemporary Trade Directory Entries</b> Name: Boskalis Zinkcon Ltd Location: 4, Crompton Way, Segensworth West, Fareham, Hampshire, PO15 5SS Classification: Marine Engineers <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A8SW (SE)	983	-	452265 108248
247	<b>Contemporary Trade Directory Entries</b> Name: The Meadows Location: The Meadows, Coldeast Way, Sarisbury Green, Southampton, SO31 7ZS Classification: Hospitals <b>Status: Inactive</b> Positional Accuracy: Automatically positioned to the address	A2NE (S)	1000	-	451097 108049
248	<b>Fuel Station Entries</b> Name: Locksheath Service Station Location: 79, Bridge Road, Park Gate, Southampton, SO31 7ZE Brand: ESSO Premises Type: Petrol Station <b>Status: Open</b> Positional Accuracy: Manually positioned to the address or location	A7SW (S)	643	-	451366 108329
249	<b>Fuel Station Entries</b> Name: Mrh Park Gate Spar Location: Petrol Station, 2, Bridge Road, Park Gate, Southampton, SO31 7GE Brand: Bp Premises Type: Petrol Station <b>Status: Open</b> Positional Accuracy: Automatically positioned to the address	A7SE (SE)	778	-	451799 108207

Map ID	Details	Quadrant Reference (Compass Direction)	Estimated Distance From Site	Contact	NGR
250	<b>Ancient Woodland</b> Name: Not Supplied Reference: 1489829 Area(m <sup>2</sup> ): 15760.49 Type: Ancient and Semi-Natural Woodland	A12SW (E)	372	7	451987 109160
251	<b>Ancient Woodland</b> Name: Not Supplied Reference: 1487717 Area(m <sup>2</sup> ): 34400.73 Type: Ancient and Semi-Natural Woodland	A12SW (E)	383	7	451966 108904
252	<b>Ancient Woodland</b> Name: Not Supplied Reference: 1487565 Area(m <sup>2</sup> ): 5173.67 Type: Ancient and Semi-Natural Woodland	A15SE (NE)	667	7	451788 109810
253	<b>Ancient Woodland</b> Name: Not Supplied Reference: 1489388 Area(m <sup>2</sup> ): 14006.83 Type: Ancient and Semi-Natural Woodland	A12NW (E)	673	7	452285 109200
254	<b>Ancient Woodland</b> Name: Bushy Land Reference: 1488006 Area(m <sup>2</sup> ): 17632.03 Type: Ancient and Semi-Natural Woodland	A16SW (NE)	697	7	451986 109735
255	<b>Ancient Woodland</b> Name: Swanwick Wood Reference: 1496137 Area(m <sup>2</sup> ): 308991.02 Type: Ancient and Semi-Natural Woodland	A13NE (NW)	706	7	450508 109881
256	<b>Ancient Woodland</b> Name: Gull Coppice Reference: 1487260 Area(m <sup>2</sup> ): 55702.64 Type: Plantation on Ancient Woodland	A12NW (E)	728	7	452292 109403
257	<b>Local Nature Reserves</b> Name: Gull Coppice Multiple Area: Y Area (m2): 127387 Source: Natural England Designation Date: Not Supplied	A12NE (E)	730	7	452294 109402
258	<b>Nitrate Vulnerable Zones</b> Name: Hamble Estuary Eutrophic Nvz (Trac) Description: Eutrophic Water Source: Environment Agency, Head Office	A11NW (NE)	0	8	451293 109179



Agency & Hydrological	Version	Update Cycle
<b>Contaminated Land Register Entries and Notices</b> Eastleigh Borough Council - Environmental Health Department New Forest District Council - Environmental Health Department Fareham Borough Council - Environmental Health Department Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department	May 2015 October 2014 September 2013 September 2014 September 2014	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
<b>Discharge Consents</b> Environment Agency - Southern Region	July 2017	Quarterly
<b>Enforcement and Prohibition Notices</b> Environment Agency - Southern Region	March 2013	As notified
<b>Integrated Pollution Controls</b> Environment Agency - Southern Region	October 2008	Not Applicable
<b>Integrated Pollution Prevention And Control</b> Environment Agency - South East Region - Solent & South Downs Area Environment Agency - Southern Region	July 2017 July 2017	Quarterly Quarterly
<b>Local Authority Integrated Pollution Prevention And Control</b> Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department New Forest District Council - Environmental Health Department Fareham Borough Council - Environmental Health Department Eastleigh Borough Council - Environmental Health Department	August 2014 December 2014 February 2015 May 2016 September 2014	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
<b>Local Authority Pollution Prevention and Controls</b> Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department New Forest District Council - Environmental Health Department Fareham Borough Council - Environmental Health Department Eastleigh Borough Council - Environmental Health Department	August 2014 December 2014 February 2015 May 2016 September 2014	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
<b>Local Authority Pollution Prevention and Control Enforcements</b> Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department New Forest District Council - Environmental Health Department Fareham Borough Council - Environmental Health Department Eastleigh Borough Council - Environmental Health Department	August 2014 December 2014 February 2015 May 2016 September 2014	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
<b>Nearest Surface Water Feature</b> Ordnance Survey	May 2017	
<b>Pollution Incidents to Controlled Waters</b> Environment Agency - Southern Region	December 1999	Not Applicable
<b>Prosecutions Relating to Authorised Processes</b> Environment Agency - Southern Region	March 2013	As notified
<b>Prosecutions Relating to Controlled Waters</b> Environment Agency - Southern Region	March 2013	As notified
<b>Registered Radioactive Substances</b> Environment Agency - Southern Region	January 2015	
<b>River Quality</b> Environment Agency - Head Office	November 2001	Not Applicable
<b>River Quality Biology Sampling Points</b> Environment Agency - Head Office	July 2012	Annually
<b>River Quality Chemistry Sampling Points</b> Environment Agency - Head Office	July 2012	Annually
<b>Substantiated Pollution Incident Register</b> Environment Agency - South East Region - Solent & South Downs Area Environment Agency - Southern Region - Hampshire and Isle of Wight Area Office Environment Agency - Southern Region - Solent and South Downs	July 2017 July 2017 July 2017	Quarterly Quarterly Quarterly









Agency & Hydrological	Version	Update Cycle
<b>Water Abstractions</b> Environment Agency - Southern Region	October 2017	Quarterly
<b>Water Industry Act Referrals</b> Environment Agency - Southern Region	July 2017	Quarterly
<b>Groundwater Vulnerability</b> Environment Agency - Head Office	April 2015	Not Applicable
<b>Drift Deposits</b> Environment Agency - Head Office	January 1999	Not Applicable
<b>Bedrock Aquifer Designations</b> British Geological Survey - National Geoscience Information Service	August 2015	As notified
<b>Superficial Aquifer Designations</b> British Geological Survey - National Geoscience Information Service	August 2015	As notified
<b>Source Protection Zones</b> Environment Agency - Head Office	October 2017	Quarterly
<b>Extreme Flooding from Rivers or Sea without Defences</b> Environment Agency - Head Office	August 2017	Quarterly
<b>Flooding from Rivers or Sea without Defences</b> Environment Agency - Head Office	August 2017	Quarterly
<b>Areas Benefiting from Flood Defences</b> Environment Agency - Head Office	August 2017	Quarterly
<b>Flood Water Storage Areas</b> Environment Agency - Head Office	August 2017	Quarterly
<b>Flood Defences</b> Environment Agency - Head Office	August 2017	Quarterly
<b>OS Water Network Lines</b> Ordnance Survey	July 2017	6 Weekly
<b>BGS Groundwater Flooding Susceptibility</b> British Geological Survey - National Geoscience Information Service	May 2013	Annually

Waste	Version	Update Cycle
<b>BGS Recorded Landfill Sites</b> British Geological Survey - National Geoscience Information Service	June 1996	Not Applicable
<b>Historical Landfill Sites</b> Environment Agency - Head Office	July 2017	Quarterly
<b>Integrated Pollution Control Registered Waste Sites</b> Environment Agency - Southern Region	October 2008	Not Applicable
<b>Licensed Waste Management Facilities (Landfill Boundaries)</b> Environment Agency - South East Region - Solent & South Downs Area Environment Agency - Southern Region - Hampshire and Isle of Wight Area Office Environment Agency - Southern Region - Solent and South Downs	October 2017 October 2017 October 2017	Quarterly Quarterly Quarterly
<b>Licensed Waste Management Facilities (Locations)</b> Environment Agency - South East Region - Solent & South Downs Area Environment Agency - Southern Region - Hampshire and Isle of Wight Area Office Environment Agency - Southern Region - Solent and South Downs	July 2017 July 2017 July 2017	Quarterly Quarterly Quarterly
<b>Local Authority Landfill Coverage</b> Eastleigh Borough Council Fareham Borough Council - Environmental Health Department Hampshire County Council - Minerals and Waste Planning New Forest District Council - Environmental Health Department Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department	May 2000 May 2000 May 2000 May 2000 May 2000 May 2000	Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable
<b>Local Authority Recorded Landfill Sites</b> Eastleigh Borough Council Fareham Borough Council - Environmental Health Department Hampshire County Council - Minerals and Waste Planning New Forest District Council - Environmental Health Department Southampton City Council - Environmental Health Services Pollution And Safety Winchester City Council - Environmental Health Department	May 2000 May 2000 May 2000 May 2000 May 2000 May 2000	Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable
<b>Registered Landfill Sites</b> Environment Agency - Southern Region - Hampshire Area Environment Agency - Southern Region - Solent and South Downs	March 2003 March 2003	Not Applicable Not Applicable
<b>Registered Waste Transfer Sites</b> Environment Agency - Southern Region - Hampshire Area Environment Agency - Southern Region - Solent and South Downs	March 2003 March 2003	Not Applicable Not Applicable
<b>Registered Waste Treatment or Disposal Sites</b> Environment Agency - Southern Region - Hampshire Area Environment Agency - Southern Region - Solent and South Downs	March 2003 March 2003	Not Applicable Not Applicable

Hazardous Substances	Version	Update Cycle
<b>Control of Major Accident Hazards Sites (COMAH)</b> Health and Safety Executive	September 2017	Bi-Annually
<b>Explosive Sites</b> Health and Safety Executive	March 2017	Bi-Annually
<b>Notification of Installations Handling Hazardous Substances (NIHHS)</b> Health and Safety Executive	November 2000	Not Applicable
<b>Planning Hazardous Substance Enforcements</b> Eastleigh Borough Council Fareham Borough Council Hampshire County Council - Minerals and Waste Planning Southampton City Council - Development Control New Forest District Council Winchester City Council - Planning Department	February 2016 February 2016 February 2016 February 2016 October 2015 October 2015	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
<b>Planning Hazardous Substance Consents</b> Eastleigh Borough Council Fareham Borough Council Hampshire County Council - Minerals and Waste Planning Southampton City Council - Development Control New Forest District Council Winchester City Council - Planning Department	February 2016 February 2016 February 2016 February 2016 October 2015 October 2015	Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update Annual Rolling Update
Geological	Version	Update Cycle
<b>BGS 1:625,000 Solid Geology</b> British Geological Survey - National Geoscience Information Service	January 2009	Not Applicable
<b>BGS Recorded Mineral Sites</b> British Geological Survey - National Geoscience Information Service	November 2017	Bi-Annually
<b>CBSCB Compensation District</b> Cheshire Brine Subsidence Compensation Board (CBSCB)	August 2011	Not Applicable
<b>Coal Mining Affected Areas</b> The Coal Authority - Property Searches	March 2014	As notified
<b>Mining Instability</b> Ove Arup & Partners	October 2000	Not Applicable
<b>Non Coal Mining Areas of Great Britain</b> British Geological Survey - National Geoscience Information Service	May 2015	Not Applicable
<b>Potential for Collapsible Ground Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Potential for Compressible Ground Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Potential for Ground Dissolution Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Potential for Landslide Ground Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Potential for Running Sand Ground Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Potential for Shrinking or Swelling Clay Ground Stability Hazards</b> British Geological Survey - National Geoscience Information Service	June 2015	Annually
<b>Radon Potential - Radon Affected Areas</b> British Geological Survey - National Geoscience Information Service	July 2011	As notified
<b>Radon Potential - Radon Protection Measures</b> British Geological Survey - National Geoscience Information Service	July 2011	As notified

Industrial Land Use	Version	Update Cycle
<b>Contemporary Trade Directory Entries</b> Thomson Directories	September 2017	Quarterly
<b>Fuel Station Entries</b> Catalist Ltd - Experian	August 2017	Quarterly
<b>Gas Pipelines</b> National Grid	July 2014	Quarterly
<b>Underground Electrical Cables</b> National Grid	December 2015	Bi-Annually
Sensitive Land Use	Version	Update Cycle
<b>Ancient Woodland</b> Natural England	May 2017	Bi-Annually
<b>Areas of Adopted Green Belt</b> New Forest District Council	May 2017	As notified
<b>Areas of Unadopted Green Belt</b> New Forest District Council	May 2017	As notified
<b>Areas of Outstanding Natural Beauty</b> Natural England	August 2017	Bi-Annually
<b>Environmentally Sensitive Areas</b> Natural England	January 2017	Annually
<b>Forest Parks</b> Forestry Commission	April 1997	Not Applicable
<b>Local Nature Reserves</b> Natural England	August 2017	Bi-Annually
<b>Marine Nature Reserves</b> Natural England	August 2017	Bi-Annually
<b>National Nature Reserves</b> Natural England	August 2017	Bi-Annually
<b>National Parks</b> Natural England	August 2017	Bi-Annually
<b>Nitrate Vulnerable Zones</b> Environment Agency - Head Office Department for Environment, Food and Rural Affairs (DEFRA - formerly FRCA)	June 2017 October 2015	Bi-Annually
<b>Ramsar Sites</b> Natural England	August 2017	Bi-Annually
<b>Sites of Special Scientific Interest</b> Natural England	August 2017	Bi-Annually
<b>Special Areas of Conservation</b> Natural England	August 2017	Bi-Annually
<b>Special Protection Areas</b> Natural England	August 2017	Bi-Annually

A selection of organisations who provide data within this report

Data Supplier	Data Supplier Logo
Ordnance Survey	
Environment Agency	
Scottish Environment Protection Agency	
The Coal Authority	
British Geological Survey	 British Geological Survey NATURAL ENVIRONMENT RESEARCH COUNCIL
Centre for Ecology and Hydrology	 Centre for Ecology & Hydrology NATURAL ENVIRONMENT RESEARCH COUNCIL
Natural Resources Wales	
Scottish Natural Heritage	
Natural England	
Public Health England	
Ove Arup	
Peter Brett Associates	



Contact	Name and Address	Contact Details
1	<b>British Geological Survey - Enquiry Service</b> British Geological Survey, Kingsley Dunham Centre, Keyworth, Nottingham, Nottinghamshire, NG12 5GG	Telephone: 0115 936 3143 Fax: 0115 936 3276 Email: <a href="mailto:enquiries@bgs.ac.uk">enquiries@bgs.ac.uk</a> Website: <a href="http://www.bgs.ac.uk">www.bgs.ac.uk</a>
2	<b>Environment Agency - National Customer Contact Centre (NCCC)</b> PO Box 544, Templeborough, Rotherham, S60 1BY	Telephone: 03708 506 506 Email: <a href="mailto:enquiries@environment-agency.gov.uk">enquiries@environment-agency.gov.uk</a>
3	<b>Fareham Borough Council - Environmental Health Department</b> P O Box 14, Civic Offices, Civic Way, Fareham, Hampshire, PO16 7PR	Telephone: 01329 236100 extn 2394 Fax: 01329 822732 Website: <a href="http://www.fareham.gov.uk">www.fareham.gov.uk</a>
4	<b>Ordnance Survey</b> Adanac Drive, Southampton, Hampshire, SO16 0AS	Telephone: 023 8079 2000 Email: <a href="mailto:customerservices@ordnancesurvey.co.uk">customerservices@ordnancesurvey.co.uk</a> Website: <a href="http://www.ordnancesurvey.gov.uk">www.ordnancesurvey.gov.uk</a>
5	<b>Hampshire County Council - Minerals and Waste Planning</b> Room 130, Ashburton Court West, The Castle, Winchester, Hampshire, SO23 8UD	Telephone: 01962 841841 Fax: 01962 847055 Website: <a href="http://www.hants.gov.uk">www.hants.gov.uk</a>
6	<b>Winchester City Council - Environmental Health Department</b> City Offices, Colebrook Street, Winchester, Hampshire, SO23 9LJ	Telephone: 01962 848519 Fax: 01962 849101 Website: <a href="http://www.winchester.gov.uk">www.winchester.gov.uk</a>
7	<b>Natural England</b> County Hall, Spetchley Road, Worcester, WR5 2NP	Telephone: 0300 060 3900 Email: <a href="mailto:enquiries@naturalengland.org.uk">enquiries@naturalengland.org.uk</a> Website: <a href="http://www.naturalengland.org.uk">www.naturalengland.org.uk</a>
8	<b>Environment Agency - Head Office</b> Rio House, Waterside Drive, Aztec West, Almondsbury, Bristol, Avon, BS32 4UD	Telephone: 01454 624400 Fax: 01454 624409
-	<b>Public Health England - Radon Survey, Centre for Radiation, Chemical and Environmental Hazards</b> Chilton, Didcot, Oxfordshire, OX11 0RQ	Telephone: 01235 822622 Fax: 01235 833891 Email: <a href="mailto:radon@phe.gov.uk">radon@phe.gov.uk</a> Website: <a href="http://www.ukradon.org">www.ukradon.org</a>
-	<b>Landmark Information Group Limited</b> Imperium, Imperial Way, Reading, Berkshire, RG2 0TD	Telephone: 0844 844 9952 Fax: 0844 844 9951 Email: <a href="mailto:customerservices@landmarkinfo.co.uk">customerservices@landmarkinfo.co.uk</a> Website: <a href="http://www.landmarkinfo.co.uk">www.landmarkinfo.co.uk</a>

Please note that the Environment Agency / Natural Resources Wales / SEPA have a charging policy in place for enquiries.

# Historical Mapping Legends

## Ordnance Survey County Series 1:10,560

	Gravel Pit		Sand Pit		Other Pits
	Quarry		Shingle		Orchard
	Osiers		Reeds		Marsh
	Mixed Wood		Deciduous		Brushwood
	Fir		Furze		Rough Pasture
	Arrow denotes flow of water		Trigonometrical Station		
	Site of Antiquities		Bench Mark		
	Pump, Guide Post, Signal Post		Well, Spring, Boundary Post		
	•285 Surface Level				
	Sketched Contour		Instrumental Contour		
	Main Roads		Minor Roads		
	Sunken Road		Raised Road		
	Road over Railway		Railway over River		
	Railway over Road		Level Crossing		
	Road over River or Canal		Road over Stream		
	Road over Stream				
	County Boundary (Geographical)				
	County & Civil Parish Boundary				
	Administrative County & Civil Parish Boundary				
	County Borough Boundary (England)				
	County Burgh Boundary (Scotland)				
	Rural District Boundary				
	Civil Parish Boundary				

## Ordnance Survey Plan 1:10,000

	Chalk Pit, Clay Pit or Quarry		Gravel Pit
	Sand Pit		Disused Pit or Quarry
	Refuse or Slag Heap		Lake, Loch or Pond
	Dunes		Boulders
	Coniferous Trees		Non-Coniferous Trees
	Orchard		Scrub
	Bracken		Heath
	Marsh		Reeds
	Building		Glasshouse
	Sloping Masonry		Pylon
	Cutting		Embankment
	Road Under		Road Over
	Level Crossing		Foot Bridge
	Standard Gauge Multiple Track		Standard Gauge Single Track
	Siding, Tramway or Mineral Line		Narrow Gauge
	Geographical County		Administrative County, County Borough or County of City
	Municipal Borough, Urban or Rural District, Burgh or District Council		Borough, Burgh or County Constituency
	Civil Parish		
	BP, BS Boundary Post or Stone		Police Station
	Church		Post Office
	Club House		Public Convenience
	Fire Engine Station		Public House
	Foot Bridge		Signal Box
	Fountain		Spring
	Guide Post		Telephone Call Box
	Mile Post		Telephone Call Post
	Mile Stone		Well

## 1:10,000 Raster Mapping

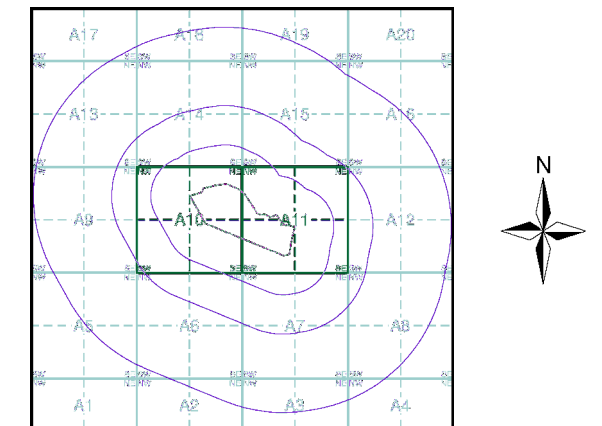
	Gravel Pit		Refuse tip or slag heap
	Rock		Rock (scattered)
	Boulders		Boulders (scattered)
	Shingle		Mud
	Sand		Sand Pit
	Slopes		Top of cliff
	General detail		Underground detail
	Overhead detail		Narrow gauge railway
	Multi-track railway		Single track railway
	County boundary (England only)		Civil, parish or community boundary
	District, Unitary, Metropolitan, London Borough boundary		Constituency boundary
	Area of wooded vegetation		Non-coniferous trees
	Non-coniferous trees (scattered)		Coniferous trees
	Coniferous trees (scattered)		Positioned tree
	Orchard		Coppice or Osiers
	Rough Grassland		Heath
	Scrub		Marsh, Salt Marsh or Reeds
	Water feature		Flow arrows
	Mean high water (springs)		Mean low water (springs)
	Telephone line (where shown)		Electricity transmission line (with poles)
	Bench mark (where shown)		Triangulation station
	Point feature (e.g. Guide Post or Mile Stone)		Pylon, flare stack or lighting tower
	Site of (antiquity)		Glasshouse
	General Building		Important Building



## Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
Hampshire & Isle Of Wight	1:10,560	1870 - 1871	2
Hampshire & Isle Of Wight	1:10,560	1897 - 1898	3
Hampshire & Isle Of Wight	1:10,560	1910	4
Hampshire & Isle Of Wight	1:10,560	1910	5
Hampshire & Isle Of Wight	1:10,560	1931	6
Hampshire & Isle Of Wight	1:10,560	1938 - 1942	7
Ordnance Survey Plan	1:10,000	1962 - 1963	8
Ordnance Survey Plan	1:10,000	1963 - 1968	9
Ordnance Survey Plan	1:10,000	1968	10
Ordnance Survey Plan	1:10,000	1972 - 1978	11
Ordnance Survey Plan	1:10,000	1972	12
Ordnance Survey Plan	1:10,000	1989	13
Ordnance Survey Plan	1:10,000	1990 - 1993	14
10K Raster Mapping	1:10,000	2000	15
Street View	Variable		16

## Historical Map - Slice A



## Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

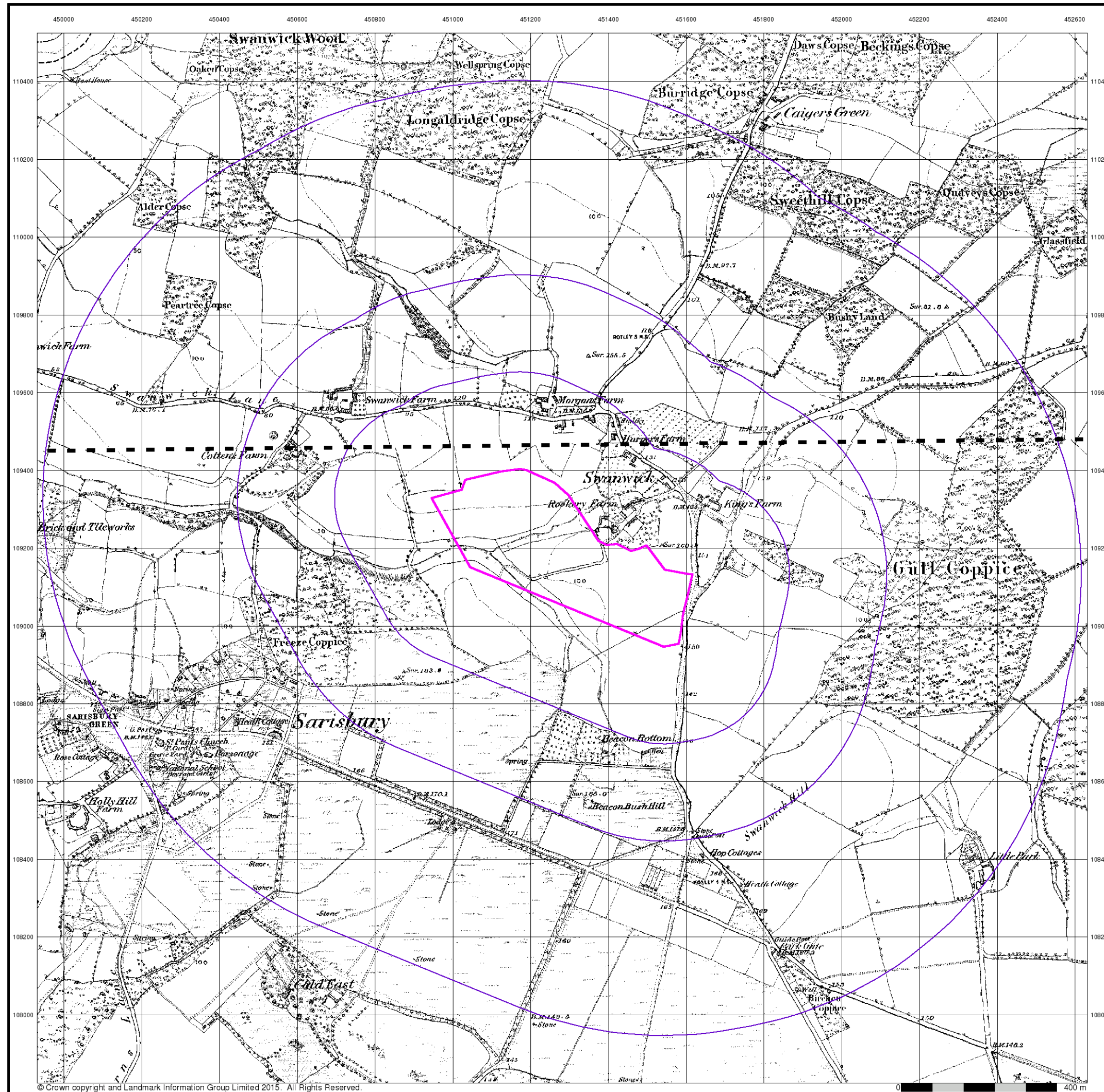
## Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: www.envirocheck.co.uk





## Hampshire & Isle Of Wight

Published 1870 - 1871

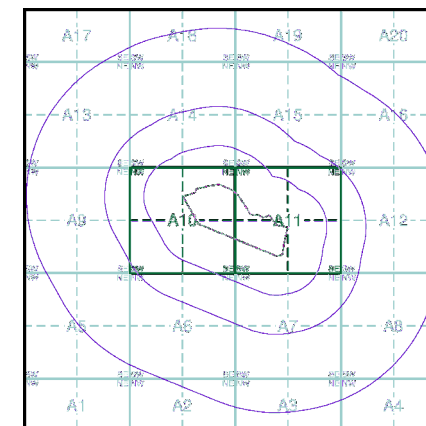
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

06600
1871
1:10,560
07400
1870
1:10,560

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

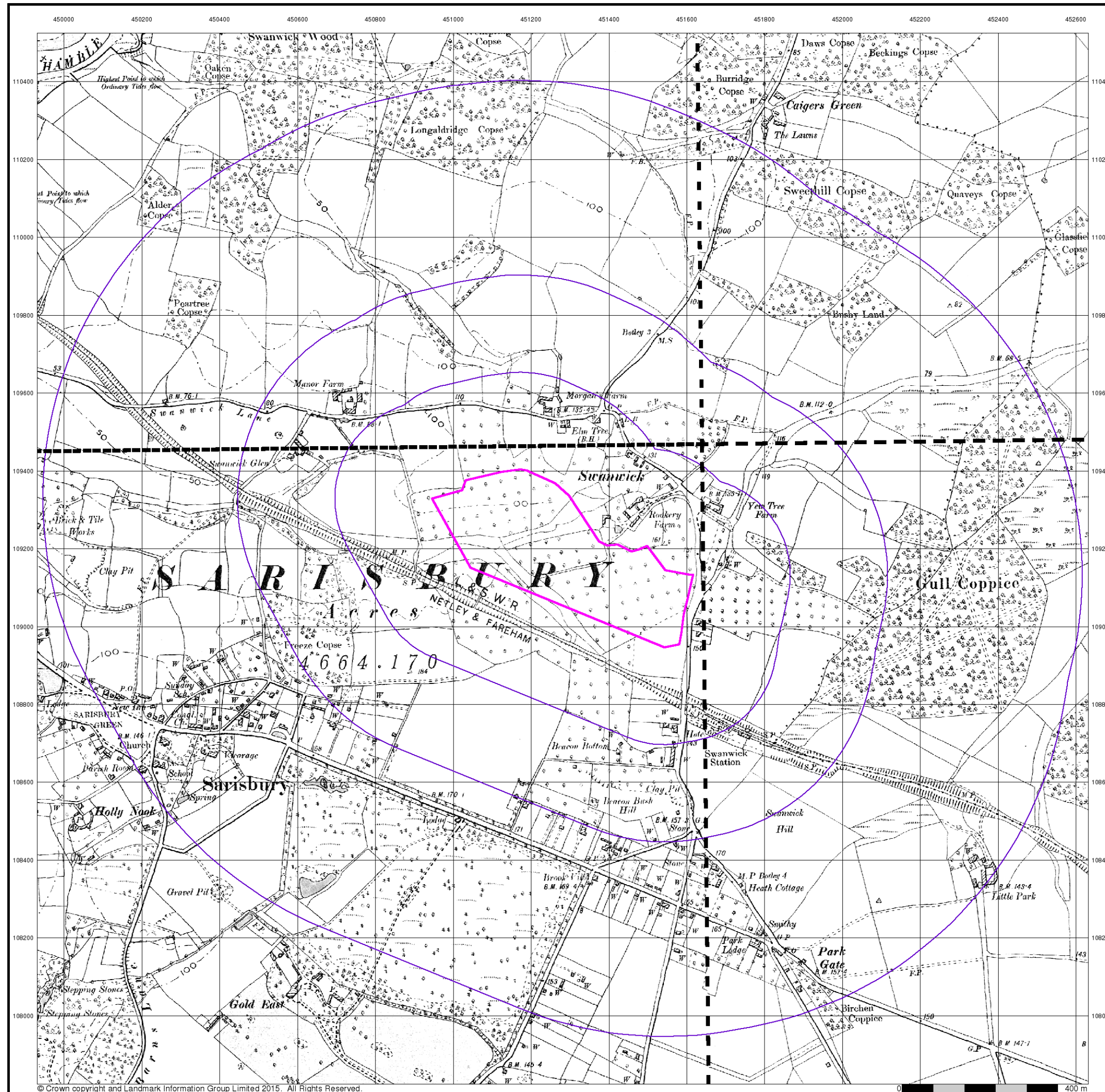
### Site Details

Site at, Swanwick, Hampshire

**Landmark**  
INFORMATION GROUP

Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)





## Hampshire & Isle Of Wight

Published 1897 - 1898

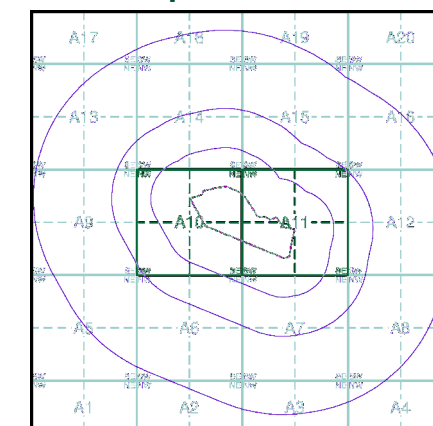
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

066SW 1898 1:10,560	066SE 1897 1:10,560
074NW 1898 1:10,560	074NE 1898 1:10,560

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

### Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: www.envirocheck.co.uk



## Hampshire & Isle Of Wight

Published 1910

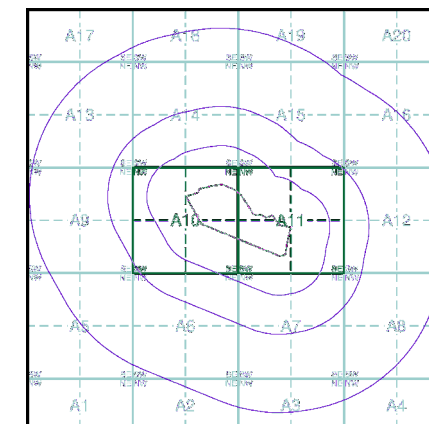
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

066SW 1910 1:10,560	066SE 1910 1:10,560
074NW 1910 1:10,560	074NE 1910 1:10,560

### Historical Map - Slice A

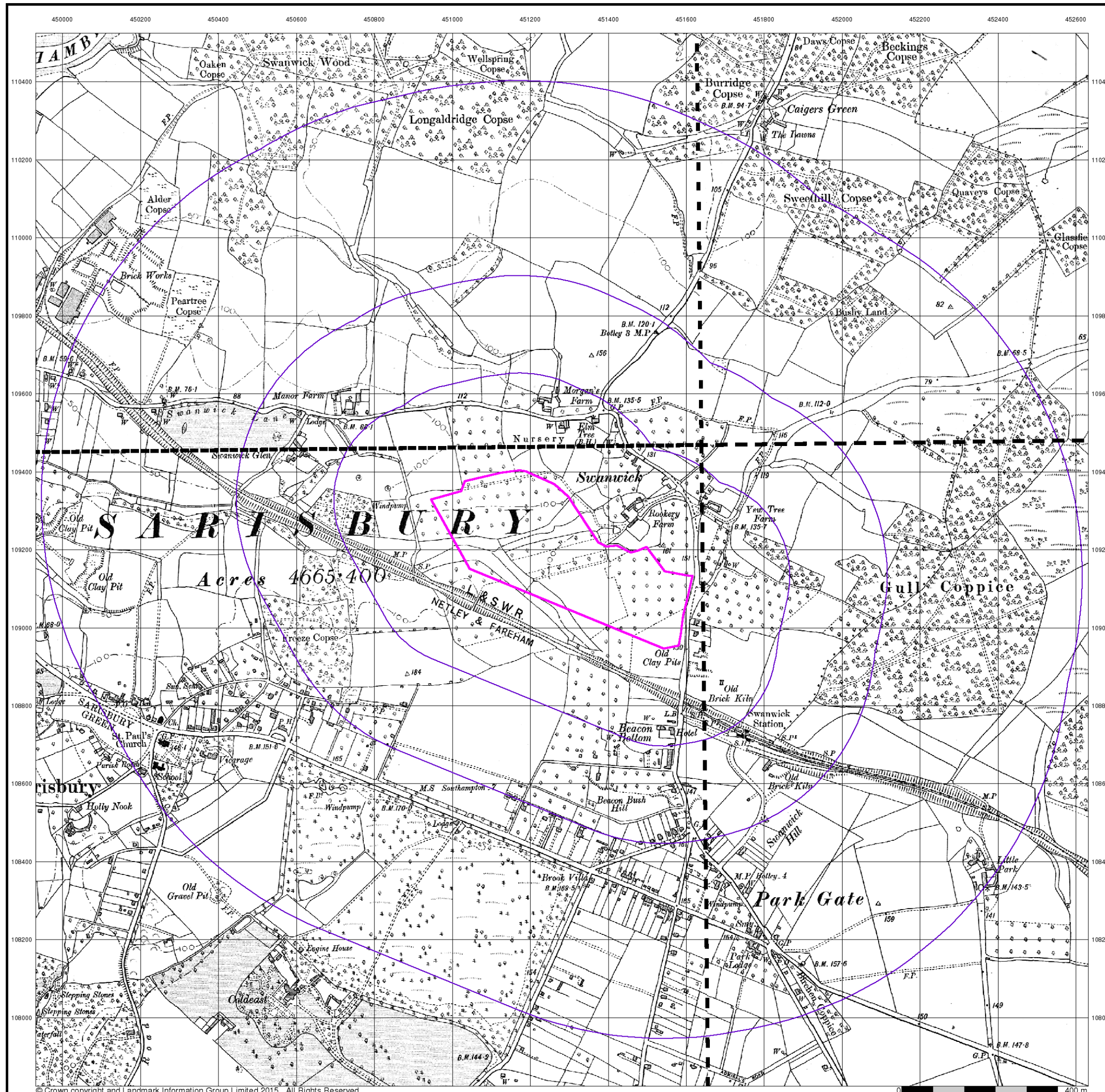


### Order Details

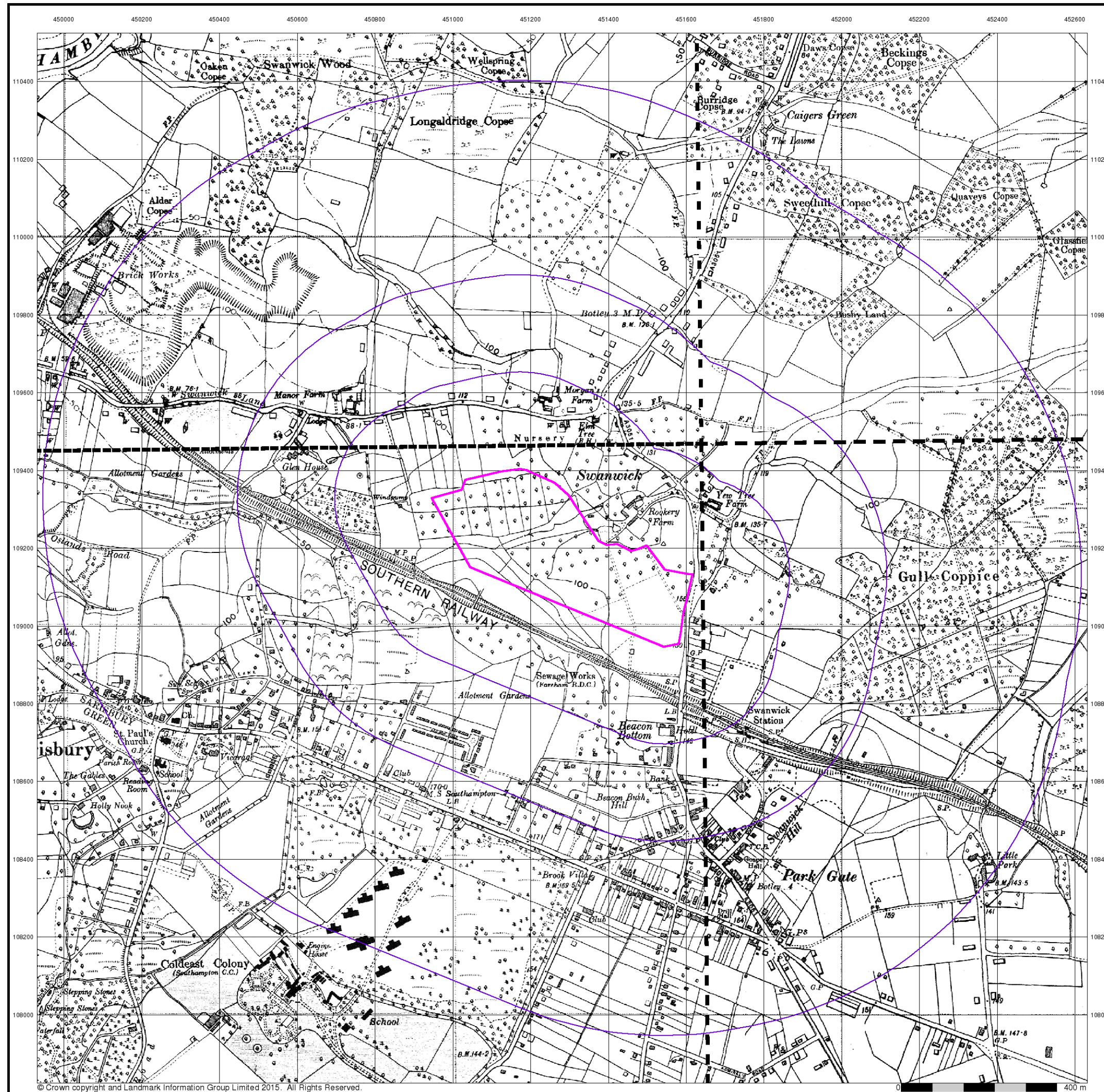
Order Number: 145633529\_1\_1  
 Customer Ref: C289128  
 National Grid Reference: 451290, 109180  
 Slice: A  
 Site Area (Ha): 14.84  
 Search Buffer (m): 1000

### Site Details

Site at, Swanwick, Hampshire







## Hampshire & Isle Of Wight

Published 1938 - 1942

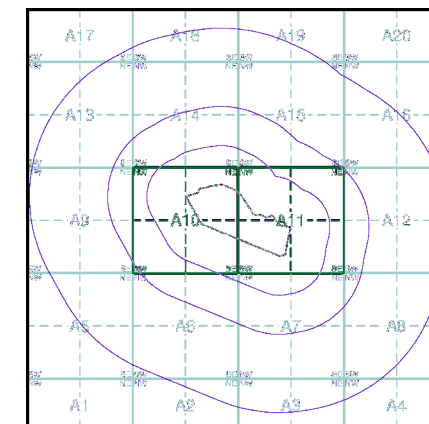
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

066SW 1942 1:10,560	066SE 1938 1:10,560
074NW 1942 1:10,560	074NE 1942 1:10,560

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

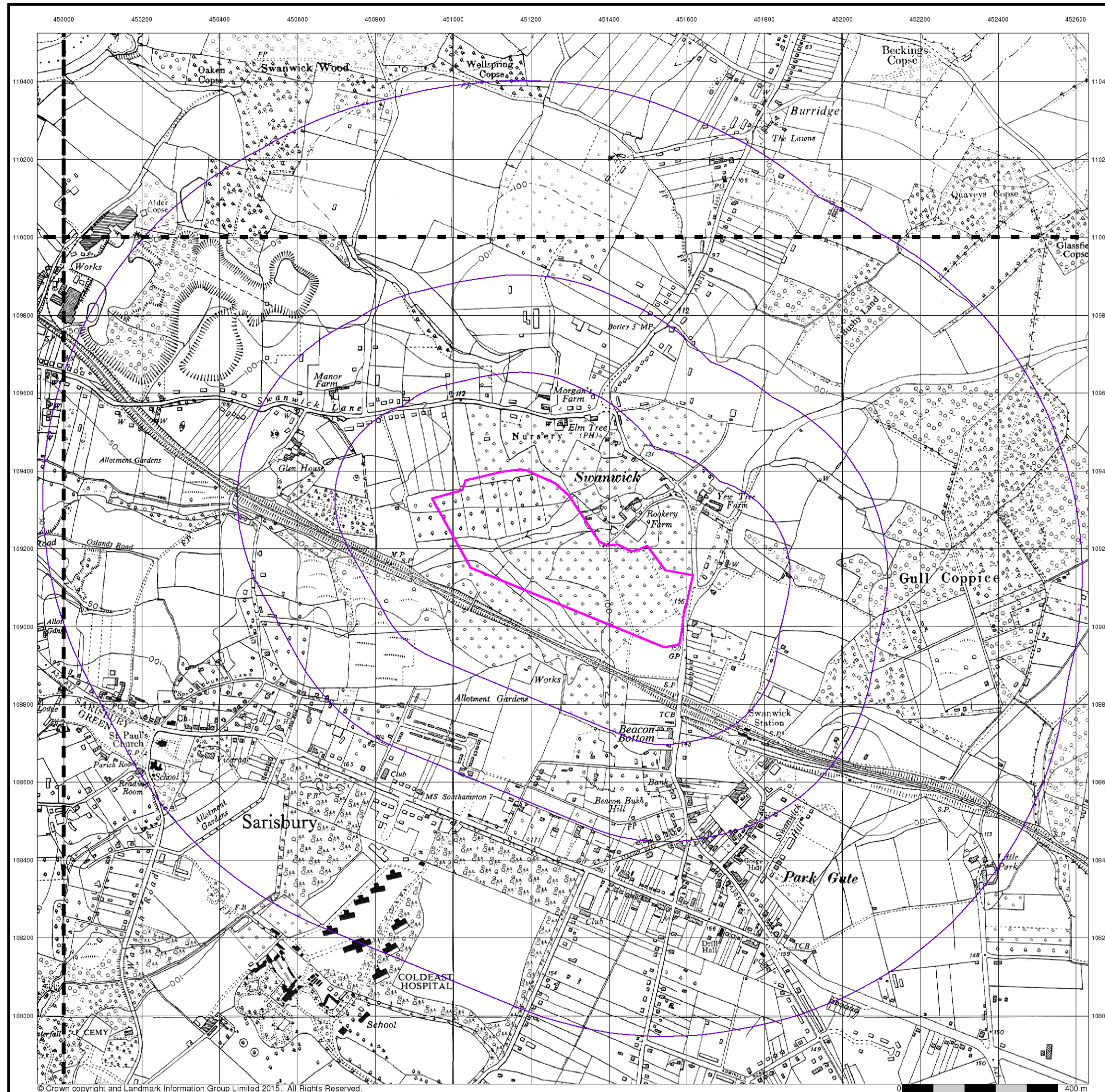
### Site Details

Site at, Swanwick, Hampshire

**Landmark**  
INFORMATION GROUP

Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)





## Ordnance Survey Plan

Published 1962 - 1963

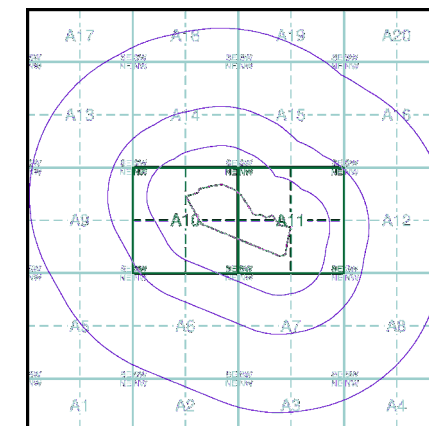
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

SU41SE	SU51SW
1963	1962
1:10,560	1:10,560
SU40NE	SU50NW
1962	1963
1:10,560	1:10,560

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

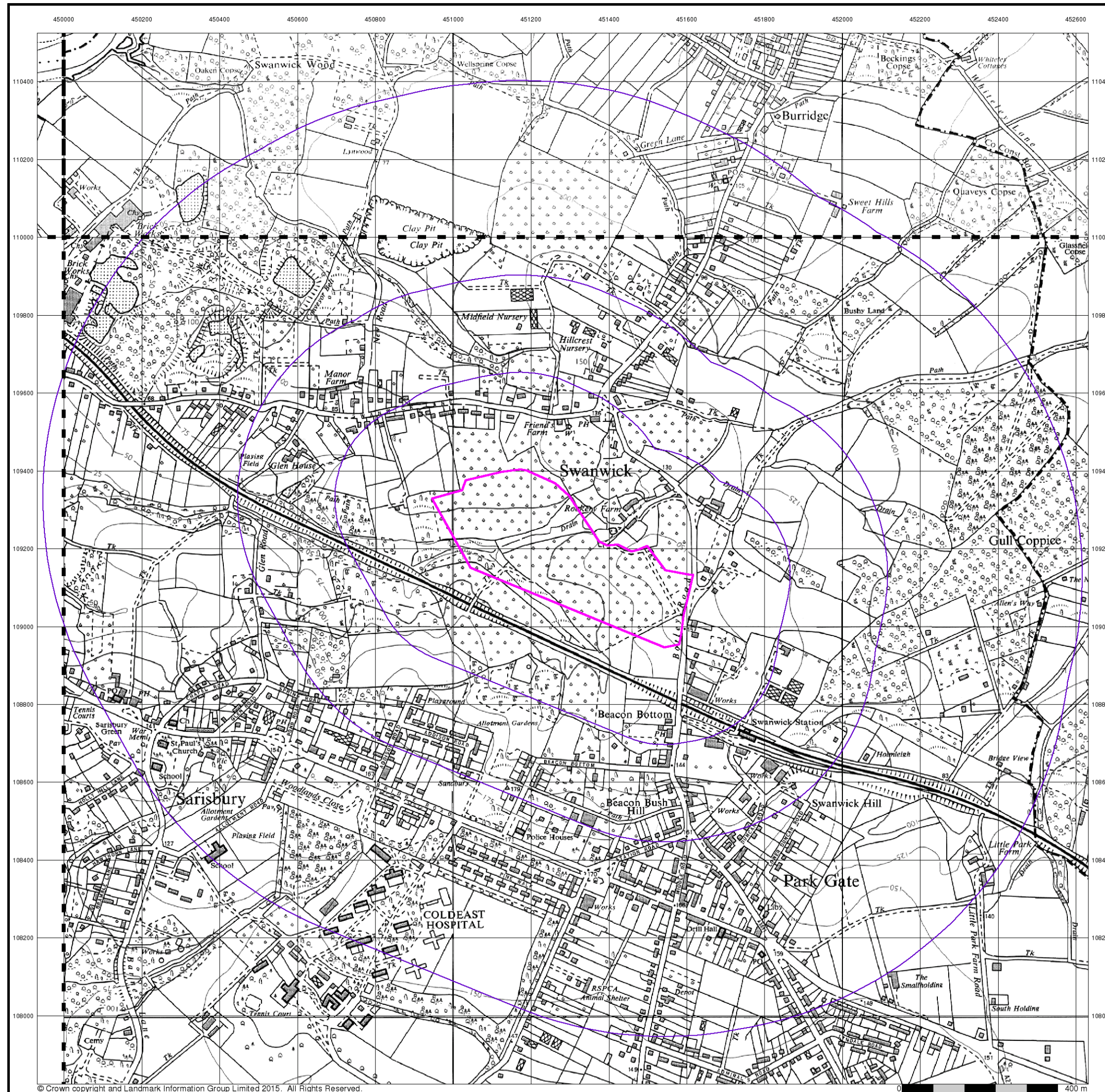
### Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)





## Ordnance Survey Plan

### Published 1963 - 1968

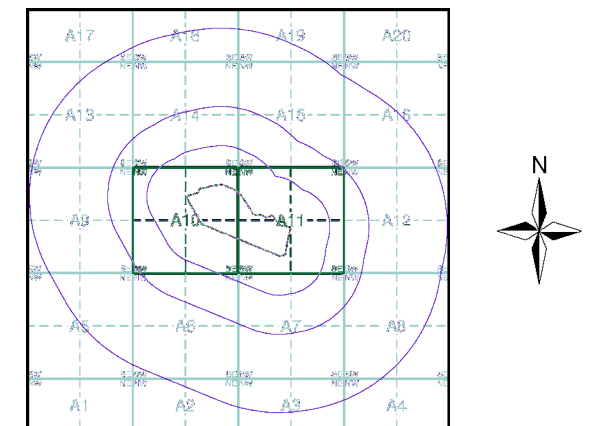
### Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

SU41SE	SU51SW
1963	1968
1:10,560	1:10,560
	SU50NW
	1968
	1:10,560

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

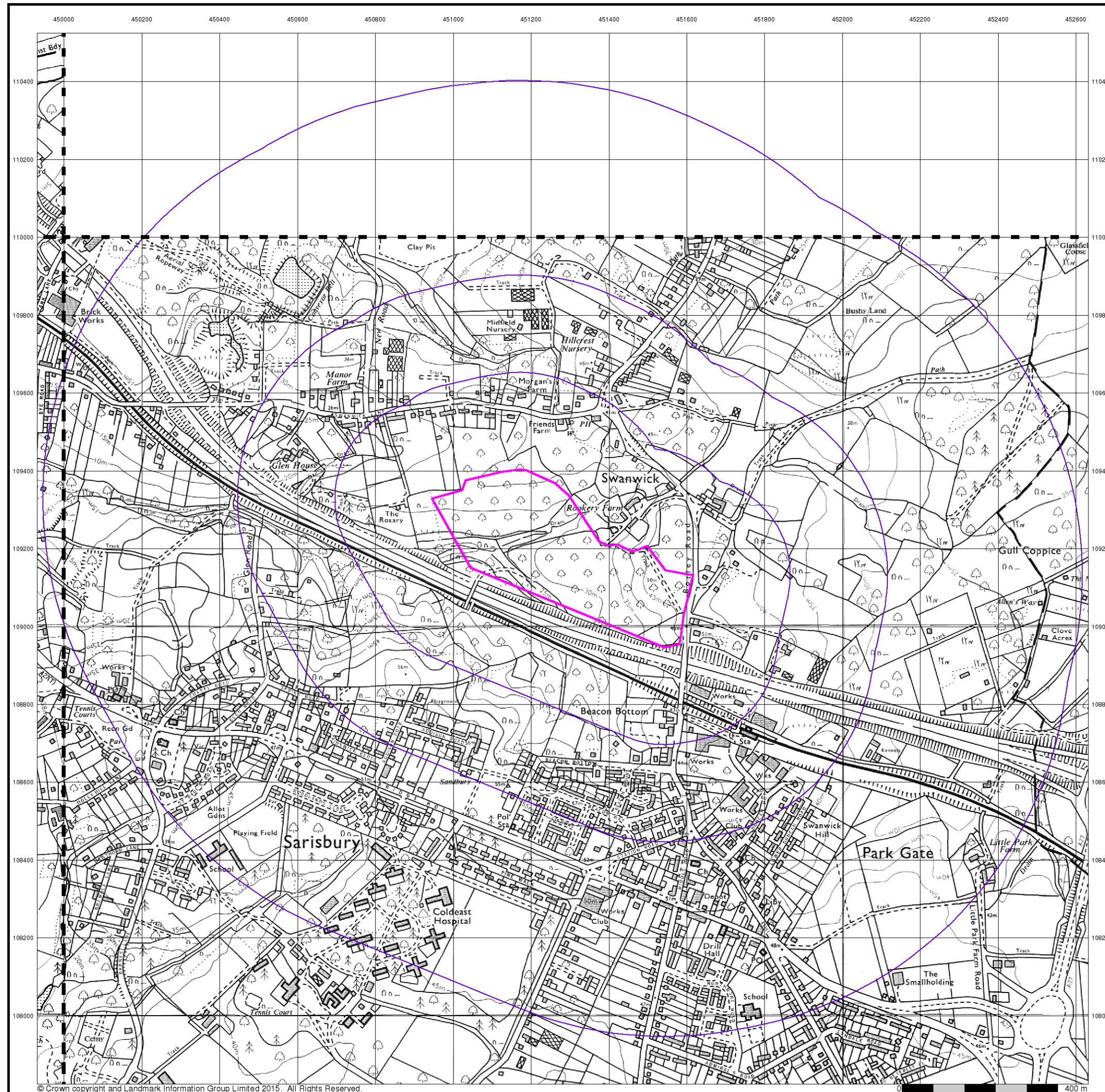
### Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)





© Crown copyright and Landmark Information Group Limited 2015. All Rights Reserved.



## Ordnance Survey Plan

Published 1972 - 1978

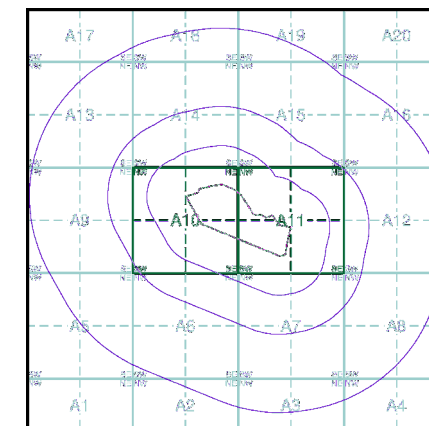
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

SU41SE	1978	1:10,000
SU40NE	1972	1:10,000
SU50NW	1977	1:10,000

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

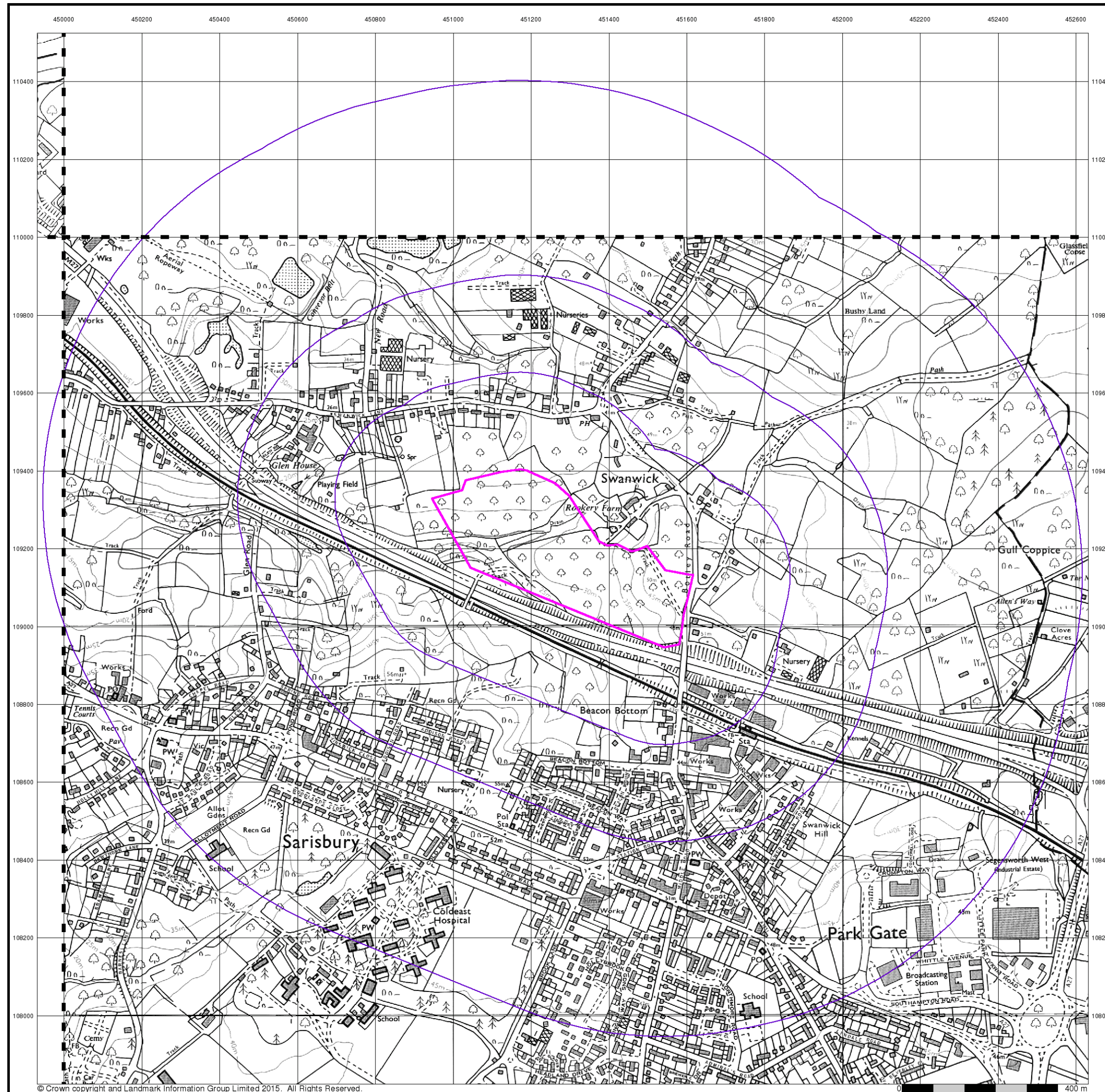
### Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)





© Crown copyright and Landmark Information Group Limited 2015. All Rights Reserved.



## Ordnance Survey Plan

Published 1990 - 1993

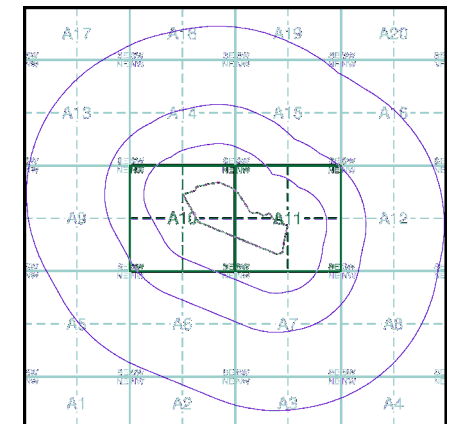
Source map scale - 1:10,000

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

### Map Name(s) and Date(s)

SU41SE	1993	1:10,000
SU50NW	1990	1:10,000

### Historical Map - Slice A



### Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

### Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)



## 10k Raster Mapping

Published 2000

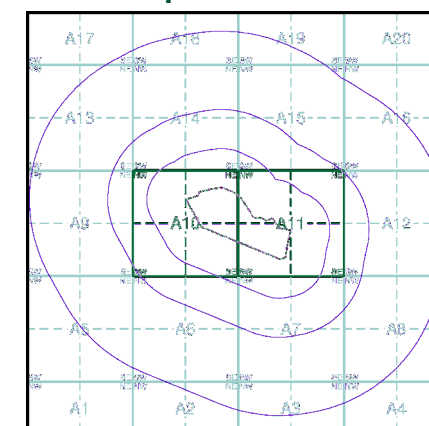
Source map scale - 1:10,000

The historical maps shown were produced from the Ordnance Survey's 1:10,000 colour raster mapping. These maps are derived from Landplan which replaced the old 1:10,000 maps originally published in 1970. The data is highly detailed showing buildings, fences and field boundaries as well as all roads, tracks and paths. Road names are also included together with the relevant road number and classification. Boundary information depiction includes county, unitary authority, district, civil parish and constituency.

### Map Name(s) and Date(s)

SU41SE	SU51SW
2000	2000
1:10,000	1:10,000
SU40NE	SU50NW
2000	2000
1:10,000	1:10,000

### Historical Map - Slice A



### Order Details

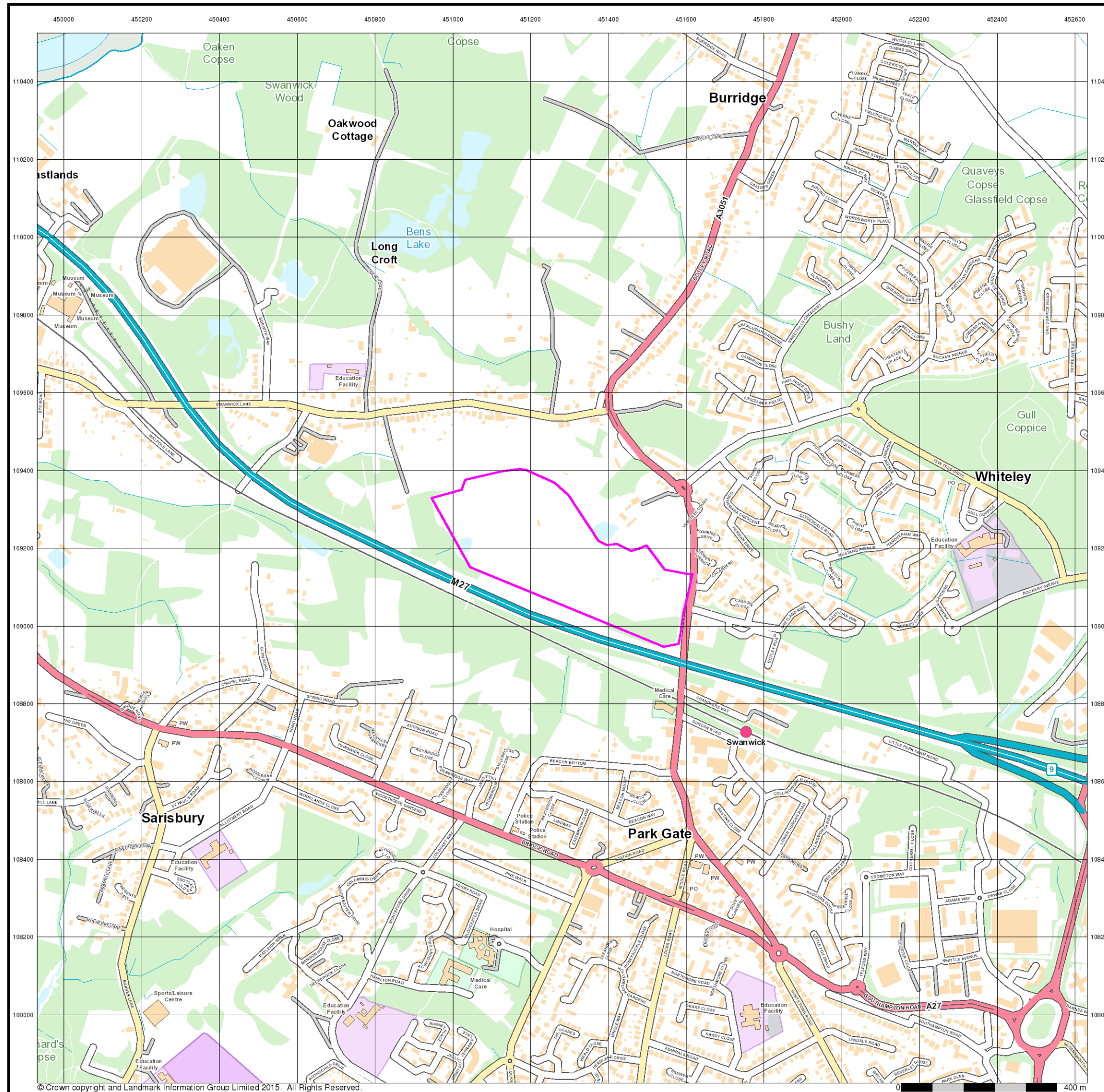
Order Number: 145633529\_1\_1  
 Customer Ref: C289128  
 National Grid Reference: 451290, 109180  
 Slice: A  
 Site Area (Ha): 14.84  
 Search Buffer (m): 1000

### Site Details

Site at, Swanwick, Hampshire







## Street View

Published 2017

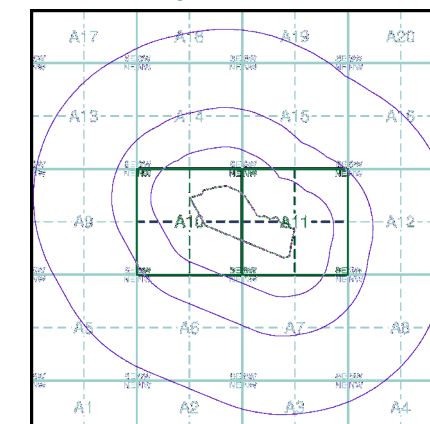
Source map scale - 1:10,000

Street View is a street-level map for the whole of Great Britain produced by the Ordnance Survey. These maps are provided at a nominal scale of 1:10,000

## Map Name(s) and Date(s)



## Street View Map - Slice A



## Order Details

Order Number: 145633529\_1\_1  
Customer Ref: C289128  
National Grid Reference: 451290, 109180  
Slice: A  
Site Area (Ha): 14.84  
Search Buffer (m): 1000

## Site Details

Site at, Swanwick, Hampshire



Tel: 0844 844 9952  
Fax: 0844 844 9951  
Web: [www.envirocheck.co.uk](http://www.envirocheck.co.uk)



## **Annex C: Photographic Records**

# Rookery Farm Site Walkover Photographs



Photo 1: Aggregates Recycling Area. View to north from top of restored landfill



Photo 2: Southern elevation of restored landfill. M27 in background.



Photo 3: Top of restored landfill



Photo 4: Pond on western boundary



Photo 5: Aggregates screening and crushing



Photo 6: Northern boundary environmental bund.



# Rookery Farm Site Walkover Photographs



Photo 7: Below ground water tank at washing plant.



Photo 8: Waste oil storage tank at washing plant.



Photo 9: Above ground diesel tank at washing plant.



Photo 10: Washing plant and mobile fuel oil storage tank



Photo 11: Haul road and northern elevation of inert landfill



Photo 12: Former landfill area to north of weighbridge

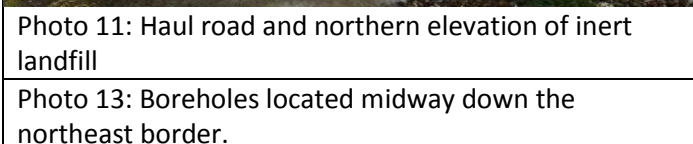


Photo 13: Boreholes located midway down the northeast border.

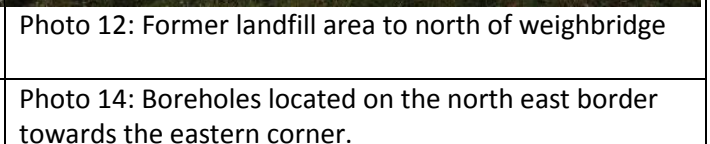


Photo 14: Boreholes located on the north east border towards the eastern corner.

Project Number: 289128.0000.0000

Site Name: Rookery Farm





## Phase II Geo-environmental Site Assessment

Rookery Farm, Swanwick, Hampshire

289128.0000.0000

April 2018

### Prepared For:

Raymond Brown Minerals and Recycling Limited  
A1 Omega Park  
Electron Way  
Chandlers Way  
Hampshire  
SO53 4SE

### Prepared By:

TRC Companies Limited

Registered office: 150 Minorities, London EC3N 1LS | Company number: 06749633

## Quality Control

Client Name:	Raymond Brown Minerals and Recycling Limited
Project Name:	Rookery Farm, Swanwick
Project No.:	289128.0000.0000
Document Title:	Phase II Geo-Environmental Site Assessment
Date:	30 <sup>th</sup> April 2018

Version:	Draft			
Prepared by:				
	T Randall			
Reviewed by:				
	S Nichols			
Approved by:				
	A Sokolowski			

# Table of Contents

<b>Executive Summary .....</b>	<b>1</b>
<b>1.0 Introduction .....</b>	<b>3</b>
1.1 Purpose.....	3
1.2 Proposed Development .....	3
1.3 Scope of Services.....	3
1.4 Significant Assumptions .....	3
1.5 User Reliance .....	4
<b>2.0 Site Description .....</b>	<b>5</b>
2.1 Location .....	5
2.2 Subject and Surrounding Area.....	5
2.3 Previous Investigations and Reports .....	5
<b>3.0 Ground Investigation Scope of Works .....</b>	<b>6</b>
3.1 Scope .....	6
3.2 Investigation Rationale .....	6
3.3 Methodology .....	6
3.4 Environmental Laboratory Analysis.....	7
3.5 Geotechnical Laboratory Analysis .....	7
<b>4.0 Factual Summary of Investigation Findings.....</b>	<b>8</b>
4.1 Ground Conditions .....	8
4.2 Groundwater .....	9
4.3 Visual and Olfactory Evidence of Contamination .....	9
<b>5.0 Soil and Groundwater Assessment .....</b>	<b>10</b>
5.1 Soil Assessment .....	10
5.2 Groundwater Assessment .....	10
5.3 Preliminary Waste Classification .....	11
<b>6.0 Ground Gas Assessment.....</b>	<b>20</b>
<b>7.0 Geotechnical Assessment.....</b>	<b>21</b>
7.1 Historical and Archive Information .....	21
7.2 Summary of TRC Investigation .....	21
7.3 Strata and Descriptions .....	21
7.4 Geotechnical Assessment .....	22
7.5 Additional Development Considerations.....	24
<b>8.0 Preliminary Environmental Risk Assessment .....</b>	<b>25</b>
8.1 Revised Conceptual Site Model .....	25
<b>9.0 Conclusions .....</b>	<b>28</b>
9.1 Findings.....	28
9.2 Summary of Environmental Risk .....	28
9.3 Summary of Geotechnical Assessment.....	29



---

## **Table of Contents: Annexes**

**Annex A: Figures**

**Annex B: Exploratory Hole Logs**

**Annex C: Field Data**

**Annex D: Laboratory Chemical Data**

**Annex E: Screened Data**

**Annex F: Laboratory Geotechnical Data**

## Executive Summary

TRC Companies Limited (TRC) was commissioned by Raymond Brown Minerals and Recycling Limited (the 'Client') to undertake a Phase II Geo-environmental and Geotechnical Site Investigation at Rookery Farm, Swanwick, Fareham, Hampshire (hereafter referred to as the 'Site').

The Site comprises an approximate 20 ha plot of land centred on National Grid Reference 451290, 109180. The Site is located approximately 300m northwest of Swanwick train station, within a triangle of land formed by the M27, Botley Road (A3051) and Swanwick Lane.

The Site currently comprises a mineral washing plant and former inert landfill. Aggregates recycling is located in the northern part of the Site and comprises crushing and recycling of imported construction derived materials, it is understood that the aggregates washing plant was decommissioned in 2017. The southern section of the Site contains a restored landfill.

It is understood that the Client is promoting the Site for inclusion within the Fareham Borough Council (FBC) local plan. The redevelopment proposal comprises the redevelopment of the existing operational area of the Site for residential purposes comprising 250 dwellings, with public open space on the former landfill area. A proposed development plan was not available at the time of writing the report.

The intrusive investigation found that the ground conditions beneath the Site comprise a variable thickness of Made Ground to maximum of 4.4m bgl, overlying the London Clay Formation (clay with silt, sand and gravel content). Based on the findings of this investigation it is not considered that the ground conditions are suitable for traditional shallow foundations due to the presence of Made Ground which inherently has variable composition and properties, of which little reliance can be placed for sustaining building loads.

TRC recommend that future foundation design should consider ground improvement to enhance the properties of Made Ground soils to facilitate shallow foundation construction or piling to achieve founding in the London Clay Formation. Further investigation is recommended to characterise the wider site area and delineate areas of Made Ground soils.

The environmental assessment identified no significant contamination within the exploratory borehole locations. Two elevated concentrations of lead were encountered in WS101. This contamination does not present a significant risk to the current land use operation, but may present a risk to more sensitive uses such as the proposed residential with gardens.

TRC recognise that this preliminary assessment was limited given the Site area. Potential areas of concern may remain around former plant areas, hazardous waste stores and possible areas of infilling. However, it is considered that contaminant risks may be addressed via localised removal of contaminated soils that may present a risk to the proposed development or placement of engineered cover to break risk pathways and mitigate hazards. These barriers may comprise building footprints, roadways and other areas of hardstanding. The barrier may also comprise clean imported soils that could be placed over areas of proposed gardens and landscaping to form a clean break layer.

Elevated heavy metals and hydrocarbons were detected in WS103 and WS104, and elevated hydrocarbons in WS101 and WS102. The concentrations marginally exceeded the most conservative screening criteria used within this assessment. The groundwater at this location is considered perched water within the Made Ground soils overlying the London Clay Formation. Given that the Site overlies Unproductive strata of the London Clay Formation, it is not considered that low levels of contamination would trigger a requirement for remediation during redevelopment.

Ground gas monitoring indicates that the Site would be classified as Characteristic Situation 2 (low risk) with respect to ground gas risks. It is recommended that low level gas protection is incorporated in structures with the requirements of BS8485:2015 – Characteristic gas situation CS2. Further monitoring may be required to meet local authority and NHBC requirements.

This Executive Summary is part of this complete report; any findings, opinions, or conclusions in this Executive Summary are made in context with the complete report. TRC recommends that the user reads the entire report for all supporting information related to findings, opinions, and conclusions.

## 1.0 Introduction

### 1.1 Purpose

TRC Companies Limited (TRC) was commissioned by Raymond Brown Minerals and Recycling Limited (the 'Client') to undertake a Phase II Geo-environmental and Geotechnical Site Investigation at Rookery Farm, Swanwick, Fareham, Hampshire (hereafter referred to as the 'Site').

A site location plan is presented as Figure 1 in Annex A.

TRC has previously completed a Phase I Geo-Environmental Site Assessment report for the Site, dated November 2017 (ref. 289128.0001.0000).

The purpose of this Phase II assessment is to supplement the existing Phase I environmental assessment through intrusive investigations to aid site characterisation and to inform the Client of potential environmental liabilities beneath the Site for the proposed residential redevelopment of the Site. Additionally, a preliminary geotechnical investigation has been undertaken to assess the ground conditions to inform potential foundation options for the Site.

### 1.2 Proposed Development

It is understood that the Client is promoting the Site for inclusion within the Fareham Borough Council (FBC) local plan. The redevelopment proposal comprises the redevelopment of the existing operational area of the Site for residential purposes comprising 250 dwellings, with public open space on the former landfill area.

A proposed development plan was not available at the time of writing the report.

### 1.3 Scope of Services

This report presents the findings of a Phase II geo-environmental site assessment, based on the following information:

- Historical uses of the Site and surroundings;
- Current use and condition of the Site;
- Environmental setting in terms of geology, hydrogeology, hydrology and surrounding land uses;
- Relevant publicly available environmental records;
- Intrusive investigation including environmental and geotechnical sampling and testing.

The Phase II assessment was conducted with due regard to the following guidance:

- The National Planning Policy Framework;
- BS10175 (2013) Investigation of Potentially Contaminated Sites – Code of Practice;
- BS5930 (2015) Code of Practice for Ground Investigations;
- Contaminated Land Report (CLR) 11 Model Procedures for the Management of Land Contamination;
- BS8485 (2015) Code of Practice for the Design of Protective Measures for Methane and Carbon Dioxide Ground Gases for New Buildings; and
- CIRIA 665 Assessing Risks Posed by Hazardous Ground Gases to Buildings.

### 1.4 Significant Assumptions

This report presents TRC's observations, findings, and conclusions as they existed on the date that this report was issued. This report is subject to modification if TRC becomes aware of additional information after the date of this report that is material to its findings and conclusions.

The reliability of information provided by others to TRC cannot be guaranteed to be accurate or complete. Performance of this Phase II Geo-environmental Site Assessment is intended to reduce, but not eliminate, uncertainty of environmental conditions associated with the subject site; therefore, the findings and conclusions made in this report should not be construed to warrant or guarantee the subject site, or express or imply, including without limitation, warranties as to its marketability for a particular use. TRC found no reason to question the validity of information received unless explicitly noted elsewhere in this report.

### **1.5 User Reliance**

This report was prepared for Raymond Browns Minerals and Recycling Ltd. Reliance on the Report by any other third party is subject to requesting and fully executing a reliance letter between TRC and the third party that acknowledges the TRC Standard Terms and Conditions with the Client, to the same extent as if they were the Client thereunder.

TRC has been provided with information from third parties for information purposes only and without representation or warranty, express or implied as to its accuracy or completeness and without any liability on such third parties part to revise or update the information. Where reliance has been provided by third parties to potential purchasers this is noted in our report.

## 2.0 Site Description

### 2.1 Location

The Site is centred on National Grid Reference 451290, 109180. It is located approximately 300m northwest of Swanwick train station within a triangle of land formed by the M27, Botley Road (A3051) and Swanwick Lane. The Site is accessed off Botley Road.

A site location plan is presented as Figure 1 in Annex A.

### 2.2 Subject and Surrounding Area

The Site is approximately 20 ha in area comprising aggregates recycling, former mineral washing plant and a former inert landfill. Aggregates recycling is carried out in the northern part of the Site and comprises crushing and recycling of imported construction derived materials, it is understood that the aggregates washing plant was decommissioned in late 2017. The southern section of the Site contains a restored landfill. The landfill was first permitted in the early 1980's, but is now closed and fully restored.

The Site is located in a countryside setting, with residential land use nearby. Land uses in the immediate vicinity include:

**Table 1: Summary of Surrounding Land Use**

Direction	Land Use
North	The Site is bound to the north by paddocks, rear gardens and residential properties along Swanwick Lane.
East	The Site is bound to the east by Botley Road and residential properties beyond.
South	The Site is bound to the south by the M27 motorway.
West	The Site is bound to the west by areas of undeveloped countryside land and the M27 motorway beyond.

The Site has an average elevation approximately 40m above Ordnance Datum (aOD) within the operation area and 45-50m AOD on the raise landfill area.

### 2.3 Previous Investigations and Reports

TRC had previously undertaken a Phase I Environmental Site Assessment (ref. 289128.0001.0000), dated November 2017.

The report identified potential sources of contamination at the Site including the use of hydrocarbon fuels, oils and grease associated with fueling and maintenance operations, and potential infilling that may have taken place. Potential off-site sources included a former inert landfill and the waste associated with this process.

The Site was identified as potentially low in terms of contaminated land liability. TRC recommended that an intrusive investigation should be undertaken to determine the ground conditions of the Site for both environmental and geotechnical purposes.



## 3.0 Ground Investigation Scope of Works

### 3.1 Scope

The TRC Phase II Geo-environmental and Geotechnical Ground Investigation was conducted at the Site on 26<sup>th</sup> March 2018. The purpose of the investigation was to characterise underlying ground conditions and investigate the potential presence of contamination that may present a risk to the proposed development at the Site.

The scope of works comprised:

- Observed drilling contractors during the advancement of four windowless sample boreholes (WS101 to WS104) to a maximum depth of 5.0mbgl with in-situ geotechnical testing (Standard Penetration Testing (SPT));
- Inspected soils within boreholes to facilitate geological logging;
- Collected soil samples for third party environmental and geotechnical laboratory testing; and
- Performed field monitoring for bulk ground gases and groundwater levels.

### 3.2 Investigation Rationale

The ground investigation was designed by TRC on behalf of the Client to gather information on the environmental and geotechnical ground conditions, groundwater, and ground-borne gas conditions at the Site. The TRC investigation aimed to gain good general coverage of the Site.

The location of the exploratory holes is presented in Figure 2.

**Table 2: Summary of Exploratory Hole Locations**

Exploratory Hole	Location
WS101	Located on the western boundary of the Site, adjacent to grassland.
WS102	Located in the centre of the wider Site, which is north of the plant machinery.
WS103	Located on the eastern boundary of the Site.
WS104	Located on the southern boundary of the Site, which is south of the plant machinery.

### 3.3 Methodology

#### 3.3.1 Borehole Investigation

TRC commissioned Southern Ground Testing (drilling contractor) to undertake the drilling works at the Site. Each borehole was advanced using a windowless sampling drilling method. The drilling works were overseen by a TRC engineer who performed field assessment and logging of soil arisings.

The works included the following key actions:

- Each of the proposed exploratory hole locations was cleared using a Cable Avoidance Tool (CAT);
- Windowless sampling drilling was performed at each location by the drilling contractor, including in-situ geotechnical testing (Standard Penetration Testing (SPT));
- On-site field assessment and recording of soil type and potential indicators of contamination;
- Collection of soil samples for environmental and geotechnical laboratory analysis; and
- Construction of gas and groundwater monitoring wells in all four borehole locations.

#### 3.3.2 Groundwater and Ground Gas Monitoring

Groundwater and ground gas monitoring was conducted by a TRC technician on the 3<sup>rd</sup> April 2018. The groundwater elevation and potential presence of any free phase oils was measured using an oil/water interface probe.

Gas monitoring was undertaken using a portable gas analyser at each monitoring well head. The field assessment gathered data relating to the concentrations of bulk ground gases (e.g. methane, carbon dioxide, carbon monoxide and oxygen).

Groundwater samples were collected from all boreholes (WS101 to WS104).

### 3.4 Environmental Laboratory Analysis

A total of nine soil samples were collected for environmental analysis during the borehole drilling works. All soil samples were packed in laboratory provided containers and delivered to DETS Ltd for chemical analysis.

All soil samples were collected to provide environmental data on the quality of near surface and shallow soils beneath the Site. Representative samples of Made Ground / Fill and natural deposits were collected where feasible. The analytical suite of soils included the following parameters:

- Asbestos (Made Ground/Fill Materials only);
- Heavy metals suite;
- Polycyclic aromatic hydrocarbons (PAH);
- Total petroleum hydrocarbons – Criteria Working Group (TPH-CWG);
- BTEX and MTBE;
- Waste Acceptance Criteria (WAC) Analysis.

Groundwater samples were collected from four boreholes where groundwater was present (WS101 to WS104). The analytical suite of groundwater included the following parameters:

- Heavy metals suite;
- Polycyclic aromatic hydrocarbons (PAH);
- Total petroleum hydrocarbons – Criteria Working Group (TPH-CWG);
- BTEX and MTBE;
- Biochemical Oxygen Demand;
- Chemical Oxygen Demand;
- Nitrate and nitrite;
- pH.

The full set of chemical results are presented in Annex D.

### 3.5 Geotechnical Laboratory Analysis

Soil sampling for geotechnical testing was undertaken via disturbed sampling. The geotechnical testing suite was limited due to the ground conditions encountered. The geotechnical testing was performed by Professional Soils Laboratory Limited (PSL) and comprised the following:

- 2 No. Moisture Contents;
- 2 No. Atterberg Testing;
- 2 No. PSD by wet sieve; and
- 7 No. pH and sulphate.

The full set of geotechnical results is presented in Annex F.

## 4.0 Factual Summary of Investigation Findings

The following section presents a summary of the investigation findings.

### 4.1 Ground Conditions

The investigation observed that the soils underlying the Site generally comprised the following:

**Table 3: Summary of Ground Conditions**

Strata	Description	Environment Agency Aquifer Status	Observed Thickness (m)	Range of Depth to top of Strata (m)	Maximum Depth of Stratum (m)
<b>Made Ground</b>	Generally comprising a clay, with variable amounts of silt, sand and gravel. Anthropogenic materials included brick, cement, breeze blocks, ceramic tiles, asphalt and ash.	N/A	1.3 - 4.4	0	4.4
<b>London Clay Formation</b>	Comprised a gravelly, silty clay or sandy, silty clay.	Unproductive strata	0.6 - 2.0	3.0 – 4.4	5.0

Made Ground was identified to a maximum depth of 4.4m bgl in WS101, being described as a clay, with variable amounts of silt, sand and gravel. The full depth of the Made Ground was not proven in WS103 and WS104, with WS104 refusing at 1.3m bgl. Occasional pockets of a sandy silt or sand was encountered within the Made Ground stratum.

The borehole logs are presented in full within Annex B. The ground conditions encountered correspond with the publicly available records of ground conditions published by the British Geological Survey (BGS). The closest published borehole records within the Site vicinity (BGS Ref: SU50NW483, 150m to the east), provides very little information other than 'clay and sand' encountered from a depth of approximately 11.0m. Further from the Site published geological records (BGS Ref: SU51SW1) identified a silty clay, with occasional pockets of sand, with a uniform stiff clay with fossils encountered below.

#### 4.1.2. Made Ground

No hardstanding was encountered during the intrusive investigation, with Made Ground encountered from the Site ground level.

The Made Ground soils were generally described as a clay, with variable amounts of sand, silt and gravel. Sand was fine to coarse grained. Gravel comprised fine to coarse brick, ceramic tiles, breeze blocks, asphalt and ash. Occasional pockets of a sandy silt and sand was encountered throughout the Made Ground, with a slight organic odour.

WS101 encountered Made Ground to 4.4m bgl, which is located on the western boundary of the Site. WS102 encountered a 'brown sandy, silty clay, with vegetation and rootlets' to 0.1m, which was underlain by the Made Ground, as per the above description and was located on the northern boundary of the Site. WS103 is located on the eastern boundary of the Site and encountered variable strata's of Made Ground, initially a clay with variable sand, silt and gravel content. Below 2.8m bgl subsurface conditions in WS103 were described as 'carbonaceous very sandy silt'. WS104 is located of the southern boundary of the Site and encountered Made Ground comprising a slightly gravelly silt. WS104 had a refusal at 1.3m bgl and as such the hole was terminated

#### **4.1.3. London Clay Formation**

Suspected London Clay Formation (LCF) was encountered in two of the sample locations. In WS101 it was encountered at 4.4m bgl and in WS102 it was encountered at 3.0m bgl. The maximum thickness encountered was 2.0m (WS102) and persisted to the base of the borehole, a maximum depth of 5.0m bgl (WS101).

In WS101 the LCF was described as an orangish brown, slightly gravelly, very sandy, very silty clay with grey mottling. In WS102 the LCF was described as a orangish brown, slightly sandy, silty clay. Both of these strata are believed to be natural ground, given that no superficial deposits are expected within the Site boundary. It is believed the geological conditions encountered are representative of the initial layers of the LCF.

## **4.2 Groundwater**

During the drilling works, a groundwater strike was noted in WS102 at 1.2m bgl and the remaining windowless samples were dry.

During subsequent gas and groundwater monitoring, groundwater was detected in all four monitoring locations, with variable depths between 0.53m and 2.88m bgl. Groundwater samples were taken from all window sample boreholes and sent to the laboratory for testing.

Field monitoring data for groundwater monitoring are presented in Annex C.

## **4.3 Visual and Olfactory Evidence of Contamination**

No distinct odour, staining or colour changes were observed during the drilling works. A slight organic odour was noted in the Made Ground of WS101 between a depth of 0.0m to 4.2m bgl.

## 5.0 Soil and Groundwater Assessment

### 5.1 Soil Assessment

In order to appraise the significance of the concentrations reported by laboratory testing, TRC has assessed each contaminant species that is elevated above the laboratory LOD against published screening criteria referred to as Generic Assessment Criteria (GAC). GACs are derived from the following reference material:

- Land Quality Management Limited and Chartered Institute of Environmental Health (November 2014), the LQM/CIEH S4ULs for Human Health Risk Assessment. Document reference: S4UL3435.

TRC has selected GACs for a residential with gardens uptake scenario. These screening criteria represent the most conservative values and would be appropriate for the proposed redevelopment scenario. A summary of the laboratory data and the screening tables with relevant GACs is presented in Annex E.

#### 5.1.1 Asbestos

No asbestos was identified in any of the samples tested.

#### 5.1.2 Heavy Metals

Elevated concentrations of lead were detected in two soil samples taken during the investigation (both from WS101, Made Ground and natural). The table below presents a summary of the samples that exceed the GAC.

**Table 4. Summary of Metals exceeding GAC**

Contaminant	GAC (mg/kg)	Maximum Concentration(mg/kg)	Location of Maximum Concentration	No. of exceedances
Lead	276	686	WS101 (0.5 – 0.6m, made ground)	2

TRC has also selected the GACs for the current land use, which is currently commercial. No heavy metal concentrations were reported that exceed the GACs. As such, residual concentrations are not considered to present a risk to the current land use.

#### 5.1.3 Hydrocarbons

No TPH or PAH concentrations were reported that exceeded the GACs. As such, residual concentrations are not considered to present a risk to the current or proposed redevelopment land uses.

### 5.2 Groundwater Assessment

In order to appraise the significance of the groundwater concentrations recorded, TRC has assessed each contaminant species that is elevated above the laboratory LOD against the following published guidance values:

- Drinking Water Standards England and Wales (2000) (amended)

Groundwater monitoring recorded groundwater in all the monitoring wells ranging from 0.53mbgl to 2.88mbgl. The monitoring data indicates that this groundwater is representative of perched water within the Made Ground soils overlying the Unproductive strata of the LCF.

No free phase oils or hydrocarbons odours were identified.

The laboratory analysis reported elevated heavy metals and PAH exceeding the DWS in the groundwater samples from WS103 and WS104. WS101 and WS102 detected speciated PAHs exceeding the DWS in the groundwater samples. The data is summarised in the table below.

**Table 5: Summary of Groundwater Exceedances**

Contaminant	DWS (µg/l)	Maximum Concentration (mg/kg)	Location of Maximum Concentration	No. of exceedances
Arsenic	10	11	WS103	1
Selenium	10	19	WS104	1
Naphthalene	0.01	0.25	WS103	4
Acenaphthene	0.01	0.17	WS103	4
Fluoranthene	0.01	0.05	WS104	4
Anthracene	0.01	0.03	WS103 / WS104	3
Phenanthrene	0.01	0.22	WS103	3
Fluorene	0.01	0.14	WS103	3
Pyrene	0.01	0.03	WS103 / WS104	4

TRC note that the elevated heavy metals and PAH exceeds the most conservative screening criteria, namely UK DWS. These screening criteria are normally reflective of the water quality required at the consumer's tap. On this basis, these minor exceedances are not considered to pose a risk to controlled waters.

### 5.3 Preliminary Waste Classification

TRC has undertaken an assessment of the data to appraise the potential waste classification of the materials. The purpose was to appraise potential requirements to manage materials during site redevelopment that may be derived as surplus to the development e.g. waste soils arising from foundation excavations.

Based on the information gathered during the investigation, TRC consider that the materials would be classified as inert or non-hazardous, depending on the import criteria of the targeted disposal Sites. Further consultation with the disposal facilities are recommended. Alternative disposal options may also include restoration or soil reclamation Sites. Further assessment of waste disposal routes is recommended upon final earthworks design and construction phase planning.



## 6.0 Ground Gas Assessment

Field monitoring for bulk ground gases was performed at all four borehole locations on the 3<sup>rd</sup> April 2018. The concentrations of the bulk gases recorded are summarised in the table below. The data presented in the table below are maximum readings recorded during the monitoring programme. The complete monitoring data set is provided within Annex C.

**Table 6: Summary of Ground Gas Field Monitoring Data**

Location	Methane (%v/v)		CO <sub>2</sub> (%v/v)		CO (ppmv)		Oxygen		Flow Rate (l/hr)	
	Peak	Steady	Peak	Steady	Peak	Steady	Min	Steady	Peak	Steady
WS101	ND	ND	3.1	3.1	ND	ND	11.8	11.8	0.0	0.0
WS102	ND	ND	0.1	0.1	ND	ND	20.8	20.8	-0.1	-0.1
WS103	11.6	11.6	0.0	0.0	105	105	7.1	7.1	-1.4	-1.4
WS104	10.8	10.8	0.0	0.0	26	26	7.7	7.7	1.3	1.2

ND – Not Detected

Methane was detected in WS103 and WS104 at a maximum concentration of 11.6%. Carbon dioxide concentrations were detected in WS101 and WS102 with concentrations ranging from 0.1% to 3.1%. Flow was detected in all the monitoring wells at rates of between -1.4l/hr and 1.3l/hr. The Phase 1 Report identified that the closed inert landfill was in the southern half of the Site and extended to the north of the Site on land adjacent to the Site entrance, staff car parking and weighbridge. The elevated methane concentrations were detected in WS103 and WS104, which are in the proximity of the closed landfill and it is likely to have acted as the source of these elevated concentrations.

TRC has assessed the bulk ground gas concentrations in accordance with current guidance (BS8485:2015). Based on the results, a gas screening value (GSV) of 0.15 l/hr was calculated, which would classify the Site as Characteristic Situation 2 (low risk).

Based on the results, it is recommended that low level gas protection is incorporated in structures in accordance with the requirements of BS8485:2015 – Characteristic gas situation CS2. However, further monitoring may be required to meet local authority and NHBC requirements.

## 7.0 Preliminary Geotechnical Assessment

### 7.1 Historical and Archive Information

Publicly available geological mapping data published by the BGS indicates that the Site is underlain by the London Clay Formation. The formation is described by the BGS as a 'silty to very silty clay, clayey silt and sometimes silt, with some layers of sandy clay'. It is a Sedimentary Bedrock formed approximately 48 to 56 million years ago in the Palaeogene Period.

The closest published borehole records within the Site vicinity (BGS Ref: SU50NW483, 150m to the east), gives very little information other than 'clay and sand' encountered from a depth of approximately 11.0m. Further from the Site published geological records (BGS Ref: SU51SW1) identified a silty clay, with occasional pockets of sand, with a uniform stiff clay with fossils encountered below.

### 7.2 Summary of TRC Investigation

The following section provides a summary of the intrusive investigation of geotechnical parameters. During the intrusive investigation, TRC gathered both in-situ and laboratory geotechnical data for the boreholes drilled on-site. Four windowless samples were drilled to a maximum of five metres with SPTs at regular intervals.

Groundwater and gas wells were installed in all four boreholes. The borehole logs are presented in Annex B.

### 7.3 Strata and Descriptions

#### 7.3.1 Made Ground

Made Ground soils are inherently variable in their composition and characteristics. As such, TRC is unable to determine representative values on geotechnical properties. Given the 4.4m thickness of the Made Ground in WS101 and significant Made Ground across the site, pH and sulphate analysis has been carried out on the Made Ground soils.

Made Ground was encountered in all exploratory hole locations, with a variable thickness of 1.3m to 4.4m. Made Ground soils generally comprised a clay with variable amounts of silt, sand and gravel. Sand was fine to coarse grained. Gravel comprised brick, concrete, ceramic tiles, breeze blocks, asphalt and ash.

SPTs performed within the Made Ground revealed recorded SPT 'N' values between 7 and <50, indicating the presence of soft (low strength) to very stiff (very high strength) ground conditions. WS103 highlights the variability of the Made Ground and its associated properties, with the cohesive deposits SPT 'N' value decreasing from <50 at 1.00m bgl to 10 at 4.00m bgl.

Five samples from the Made Ground were tested for aqueous extract Sulphate (SO<sub>4</sub>) and pH, with depths ranging from 0.1m to 3.7m bgl. Water soluble sulphate contents ranged between 51mg/l and 370mg/l.

In accordance with BRE guidelines, the characteristic value is calculated by determining the mean of the highest 20% of results. In this case the characteristic value is 370mg/l. On this basis the Design Sulphate Class is DS-1. The pH values in the soils samples varied between 7.7 and 11.4. The mean of the lowest 20% of values is 7.7%, which represents the characteristic value. Mobile groundwater conditions have been assumed and on this basis the Aggressive Chemical Environment for Concrete (ACEC) class for the Site is AC-1.

#### 7.3.2 London Clay Formation

The suspected London Clay Formation (LCF) was encountered in WS101 and WS102, underlying the Made Ground soils. The LCF was proven to a maximum depth of 5.0m bgl in WS101, generally comprising clay, with variable sand, silt and gravel content. The LCF was encountered at depths between 3.0m and 4.4m bgl, with a maximum thickness of 2.0m in WS102.

SPTs performed within the LCF revealed recorded SPT 'N' values between 11 to 14 indicating the presence of soft to firm (medium strength) ground conditions. SPTs were consistent throughout the stratum, with little variation.

Particle Size Distribution (PSD) analysis was carried out on two samples within the LCF, generally indicating a clay / silt with variable amounts of sand. WS101 at 4.7m to 4.9m bgl returned with a primary constituent of clay / silt (22% / 33%), with a sand content of 44% and a gravel content of 1%. WS102 at 3.2m to 3.4m bgl returned with a primary constituent of clay / silt (33% / 46%), with a sand percentage of 21%.

Atterberg limit tests were carried out on two samples within the LCF, at depths between 3.2m and 4.7m bgl. The test results indicate that the cohesive deposits can be classified as Clay of low (one test) to intermediate (one test) plasticity. The modified plasticity index (PI) was calculated to be 15% and 17% and in accordance with NHBC guidelines the Clay is of low volume change potential (VCP).

Two samples from the LCF were tested for aqueous extract Sulphate (SO<sub>4</sub>) and pH, with depths ranging from 3.2m to 4.9m bgl. Water soluble sulphate contents were 180mg/l and 210mg/l. In accordance with BRE guidelines, the characteristic value is calculated by determining the mean of the highest 20% of results. In this case the characteristic value is 210mg/l. On this basis the Design Sulphate Class is DS-1. The pH values in the soils samples varied between 7.7 and 7.9. The mean of the lowest 20% of values is 7.7%, which represents the characteristic value. Mobile groundwater conditions have been assumed and on this basis the Aggressive Chemical Environment for Concrete (ACEC) class for the Site is AC-1.

## 7.4 Preliminary Geotechnical Assessment

### 7.4.1 General

This preliminary geotechnical assessment is based on the parameters determined from the field work and laboratory analysis described within this report. This assessment provides an overview of potential foundation solutions and infrastructure design, and does not constitute a detailed design report for the proposed development.

It is understood that the Client is promoting the Site for potential redevelopment of the existing operational area of the Site for residential purposes comprising 250 dwellings, with public open space on the former landfill area.

For the purposes of this assessment, TRC has assumed that finished ground levels will be at, or close to existing ground levels. In the event that these levels are changed, then TRC would recommend that this assessment is revisited to examine potential changes in recommendations.

### 7.4.2 Desiccation Assessment

Desiccation caused by climate or tree root activity can be seasonally influenced, and relates primarily to the moisture content and plasticity of the ground. TRC has undertaken an initial assessment of desiccation / suction, made by comparing moisture content test results with Atterberg Limit Tests to assess if a moisture content deficit exists. Two methods of identifying desiccated soils within high plasticity clays are provided by Driscoll (1983), where significant desiccation is defined as when the soil has a suction of 100 kN/m<sup>2</sup> or greater. These are:

- If moisture content < 0.4 x liquid limit, or
- If moisture content < plastic limit + 2 %

It is likely that significant desiccation is probable in samples where both Driscoll criterion are met.

The data gathered within the scope of this assessment indicates that none of the soils would be considered desiccated. However, TRC note that the investigation was limited in its scope and the recent ground investigation only encountered London Clay Formation in WS101 and WS102. Testing and subsequent assessment is limited to two samples. As such, further investigation and sampling is recommended to confirm the above assessment.

### 7.4.3 Foundations

The Made Ground soils are not considered suitable as a founding stratum for traditional foundations. This is due to an inherent variability in composition of Made Ground soils and their associated properties. The investigation encountered Made Ground of variable thickness of 1.3m to 4.4m bgl.

In locations where the Made Ground extends below the 'usual' depth of foundations, the excavation for formation / footings should extend to at least 300mm below the interface of the Made Ground / natural ground, subject to NHBC requirements. The natural strata encountered is believed to be LCF and was encountered in WS101 and WS102 only, between a depth of 3.0m and 4.4m bgl.

Little reliance can be placed upon the consistency of the ground to support 'standard' building loads for the Site. A programme of ground improvement or pile foundation solution is likely to be required for the Site to facilitate development. Foundation depths may also need to be deepened to take into account of the effects of future tree growth and/or planting, and/or tree removal causing heave; design to NHBC Practice Note 4.2 is recommended.

A further evaluation/investigation of the strength of the ground beneath the entire development footprint is recommended in order to evaluate any inconsistencies (or the corollary) within the depths of the underlying strata and to evaluate the appropriate foundation method.

### 7.4.4 Excavations

Should a ground improvement methodology be utilised at the Site, excavation to the anticipated founding depths should be readily achievable using standard excavation plant. The developer should consider the potential for random and sudden falls from the faces of near-vertically sided excavations at the Site. This may be more prevalent in the Made Ground soils and low strength natural strata; the potential for excavation collapse may be exacerbated by perched water inflows.

A risk assessment on the stability of any open excavation should be undertaken by a competent person and appropriate measures employed to ensure safe working practice in and around open excavations. Temporary trench support or battering of excavation sides should be considered for all excavations, particularly where personnel are required to enter the excavations.

Groundwater was encountered during the investigation with resting levels between 0.53m bgl and 2.88m bgl. It is likely that the groundwater accumulating within shallow excavations could be managed via sump pumping. It should be noted that groundwater levels vary seasonally and timing of the construction programme may influence the volumes of groundwater that need to be managed. The developer should also consider the impact of weather and the potential for rainwater and surface run-off to accumulate within excavations, as clay will soften quickly.

Water pumped from excavations may require pre-treatment prior to discharge. This could include settlement tanks to reduce silt and suspended solids. No significant contamination has been identified at the Site, therefore further filtration or other such treatment stage is considered unlikely. However, the developer should consult with the local water authority and/or EA to obtain necessary discharge consents and agree the scope of pre-treatment prior to discharge.

### 7.4.6 Below Ground Concrete

Water soluble sulphate analyses were carried out on seven samples obtained between a depth of 0.1m bgl and 4.9m bgl, within both the Made Ground and London Clay Formation, with soil pH determination also carried out on these samples. In accordance with BRE Special Digest 1 (2005) the Design Sulphate Class is DS-1. Mobile groundwater conditions have been assumed and on this basis the Aggressive Chemical Environment for Concrete (ACEC) class for the Site is AC-1. Further chemical testing would be required should piled foundations solution be applied to the Site.

### 7.4.7 Soakaway Potential

The underlying LCF comprises low permeability clays and silts. As such, soakaways are not considered suitable for future development.

#### **7.4.8 Pavement Construction**

No testing of near-surface conditions for pavement design was included within the scope, but a CBR figure of 2% could be conservatively assumed for pavements on (predominantly) clayey material, and if the formation could be frost-susceptible, a depth of 450 mm should be excavated and replaced. Once the position of proposed roads and areas of hardstanding have been finalised, in-situ testing could be undertaken to determine an appropriate design CBR value at formation level.

### **7.5 Additional Development Considerations**

#### **7.5.1 Private Garden and Shared Landscaping**

Currently there is no significant resource of growing medium on the Site. It is assumed that garden and soft landscaping areas would require placement of at least a 450mm cap of subsoil/topsoil. This capping layer may also be required to serve as a segregating layer to mitigate risks of contact between future site users and residual contamination observed in WS101.

It is recommended that imported materials must be 'clean' and suitable for use. Appropriate validation documentation will need to be submitted to the local authority to confirm imported material is suitable for use. This will comprise routine sampling and testing of materials.

Any existing topsoil encountered at the Site could also be tested for fertility and suitability. It may be found suitable for use as a subsoil, if not fertile enough for use as topsoil in domestic gardens.

## 8.0 Preliminary Environmental Risk Assessment

### 8.1 Conceptual Site Model

The methodology of this risk assessment uses the source-pathway-receptor pollutant linkage to provide a qualitative appraisal of environmental risks and potential liabilities associated with soil and groundwater contamination at the Site.

The conceptual site model (CSM) is prepared on the basis of proposed redevelopment to comprise comprising 810 residential units with ground floor retail, commercial, cultural and amenity space.

### 8.2 Inputs

The following parameters have been considered within the CSM:

- **Sources** – The CSM considers potential historical and more recent sources of industrial land uses, which may present a risk of contamination. The Phase 1 Report identified the potential for localised hotspots of hydrocarbon contamination from plant refuelling and maintenance. Also, the potential infilling associated with the landfill, which could generate ground gases. Contaminants have been identified during the laboratory analysis including elevated lead concentrations in soil and elevated heavy metals and PAH in the perched water.
- **Pathways** – TRC has considered human health risk pathways within the context of proposed residential redevelopment comprising dermal contact, ingestion, inhalation and plant uptake, leaching of contamination to ground, contact with buried services and migration of ground gases.
- **Receptors** – TRC has considered risks to human health (construction workers and future residents, site users and general public accessing public open space) and groundwater within the perched Made Ground. The underlying LCF is classified as an Unproductive Strata and therefore has not been considered as a receptor. Likewise, the stream that crosses the Site is understood to be within a culvert and has been considered to be hydraulically isolated.

### 8.3 Revised Conceptual Site Model

**Table 7: Revised Conceptual Site Model**

Source	Pathway	Receptor	Risk
<b>On-Site Sources</b>			
<p>Elevated concentrations of lead in soils.</p> <p>Elevated heavy metals and speciated PAHs concentrations in the perched water.</p> <p>Elevated methane concentrations associated with the closed landfill at the Site.</p>	<p>Dermal contact, ingestion and inhalation pathways</p>	<p>Future site users</p>	<p><b>Low to Moderate</b></p> <p>The presence of private gardens as part of the proposed development may present a risk to future site users through direct contact with contamination if present.</p> <p>This pathway could be eliminated via the removal of contaminated Made Ground soils or placement of clean cover barriers comprising subsoil/topsoil across areas of landscaping and private gardens or hardstanding across</p>



Source	Pathway	Receptor	Risk
			building footprints and roadways.
		Neighbouring residents	<b>Low</b> No significant contamination concentrations detected that could present a potential risk to receptors.  Underlying London Clay Formation exhibits low permeability characteristics, which would prevent contaminant migration contamination.
		Construction workers	<b>Low</b> Risk pathway to be mitigated via Personal Protective Equipment (PPE), good hygiene practices and construction site management.
	Leaching of contaminants and vertical migration into groundwater	Controlled waters	<b>Low</b> EA designate underlying London Clay as Unproductive strata.  Exceedances of heavy metals and speciated PAHs was identified in perched water samples collected (WS101 too WS104). The concentrations marginally exceeded highly conservative DWS screening values and it is therefore not considered that the concentrations present a significant risk.
	Contact with buried services	Buried services	<b>Low</b> Proposed development to consider risk of residual contamination and incorporate protective measures as appropriate. This may include clean service corridors and / or use of chemically resistant pipework.
	Migration of ground gases onto Site and ingress into buildings	Future site users	<b>Low</b> Based on the site investigation findings, the Site would be classified as Characteristic Situation 2 (low risk), recommending basic gas protection is incorporated in the proposed structures.

Source	Pathway	Receptor	Risk
		Construction workers	<b>Low</b> Pathway to be managed through good construction practices and mitigation of risks when working in confined spaces.

## 9.0 Conclusions

### 9.1 Findings

The Site is approximately 20 ha in area comprising an aggregates recycling and mineral washing plant and a former inert landfill. Aggregates recycling is carried out in the northern part of the Site and comprises crushing and recycling of imported construction derived materials, it is understood this operation was decommissioned in late 2017. The southern section of the Site contains a restored landfill. The landfill was first permitted in the early 1980's, but is now closed and fully restored.

The intrusive investigation found that the ground conditions beneath the Site comprise a variable thickness of Made Ground to a maximum depth of 4.4m bgl, overlying the London Clay Formation (clay with silt, sand and gravel content).

Although low levels of hydrocarbon and PAH contamination was detected within the soils underlying the Site, none of the concentrations recorded exceed the GAC for the most sensitive screening values comprising residential end use with plant uptake. Made Ground in WS101 contained an elevated concentration of lead that exceeded the GAC for the proposed residential end use with plant uptake. This concentration does not present a significant risk to current land use, but may present a potential risk to more sensitive land uses such as residential development.

Groundwater levels ranged from 0.53m bgl to 2.88m bgl. Samples were collected from all the boreholes, with analysis of samples from WS103 and WS104 reporting elevated concentrations of heavy metals and PAHs, and WS101 and WS102 reporting elevated concentrations of PAHs. The concentrations marginally exceeded the most conservative criteria, namely UK DWS, which is normally reflective of the water quality required at the consumer's tap.

Gas monitoring undertaken at the Site indicated that the Site would be classified as a Characteristic Situation 2 (low risk).

### 9.2 Summary of Environmental Risk

TRC considers the Site to be generally low risk with respect to contaminated land liability. The concentrations of heavy metals and hydrocarbons detected during this investigation as not at significant levels that would pose a significant risk to the current land use at the Site.

With respect to a proposed residential redevelopment scenario, TRC considers that the data does not indicate that the Site poses a significant risk to proposed development. Low levels of heavy metals and hydrocarbons detected during the investigation are not at significant concentrations that could trigger a requirement for site wide remediation. Elevated lead detected at WS101 may present an unacceptable risk to proposed development. However, risks could be remediated via either removal of locally contaminated soils or placement of engineered capping either comprising hard paved surfaces of building footprints, roadways etc. or through the placement of clean imported soils to create gardens and landscaping. TRC would recommend a minimum thickness of 600mm clean cover in areas of private gardens and 300mm for areas of shared landscaping.

Minor concentrations of heavy metals and hydrocarbons within the underlying groundwater is not considered to present a significant risk to controlled waters or trigger a potential requirement for site wide remediation. This investigation has found that the concentrations are marginally elevated above the UKDWS, which represents a highly conservative screening value. The absence of sensitive controlled water receptors will minimise any requirement for groundwater remediation.

Gas monitoring indicates that the Site would be classified as Characteristic Situation 2 (low risk) with respect to ground gas risks, therefore it is recommended that low level gas protection is incorporated in structures with the requirements of BS8485:2015 – Characteristic gas situation CS2. Further monitoring would be required to meet local authority and NHBC requirements.

### 9.3 Summary of Geotechnical Assessment

The Made Ground soils are not considered suitable as a founding stratum for traditional foundations. This is due to an inherent variability in composition of Made Ground soils and their associated properties. The investigation encountered Made Ground of variable thickness, with a maximum thickness of 4.4m bgl. In locations where the Made Ground extends below the 'usual' depth of foundations, the excavation for formation / footings should extend at least 300mm below the interface of the Made Ground / natural ground, subject to NHBC requirements. The natural strata encountered is believed to be London Clay Formation and was encountered in WS101 and WS102 only, between a depth of 3.0m and 4.4m bgl.

Little reliance can be placed upon the consistency of the ground to support 'standard' building loads for the Site. A pile foundation solution or ground improvement programme is likely to be required for the Site. Foundation depths may also need to be deepened to take into account the effects of future tree growth and/or planting, and/or tree removal causing heave; design to NHBC Practice Note 4.2 is recommended.

The Design Sulphate Class would be DS-1 and the Aggressive Chemical Environment for Concrete (ACEC) class for the Site is AC-1.

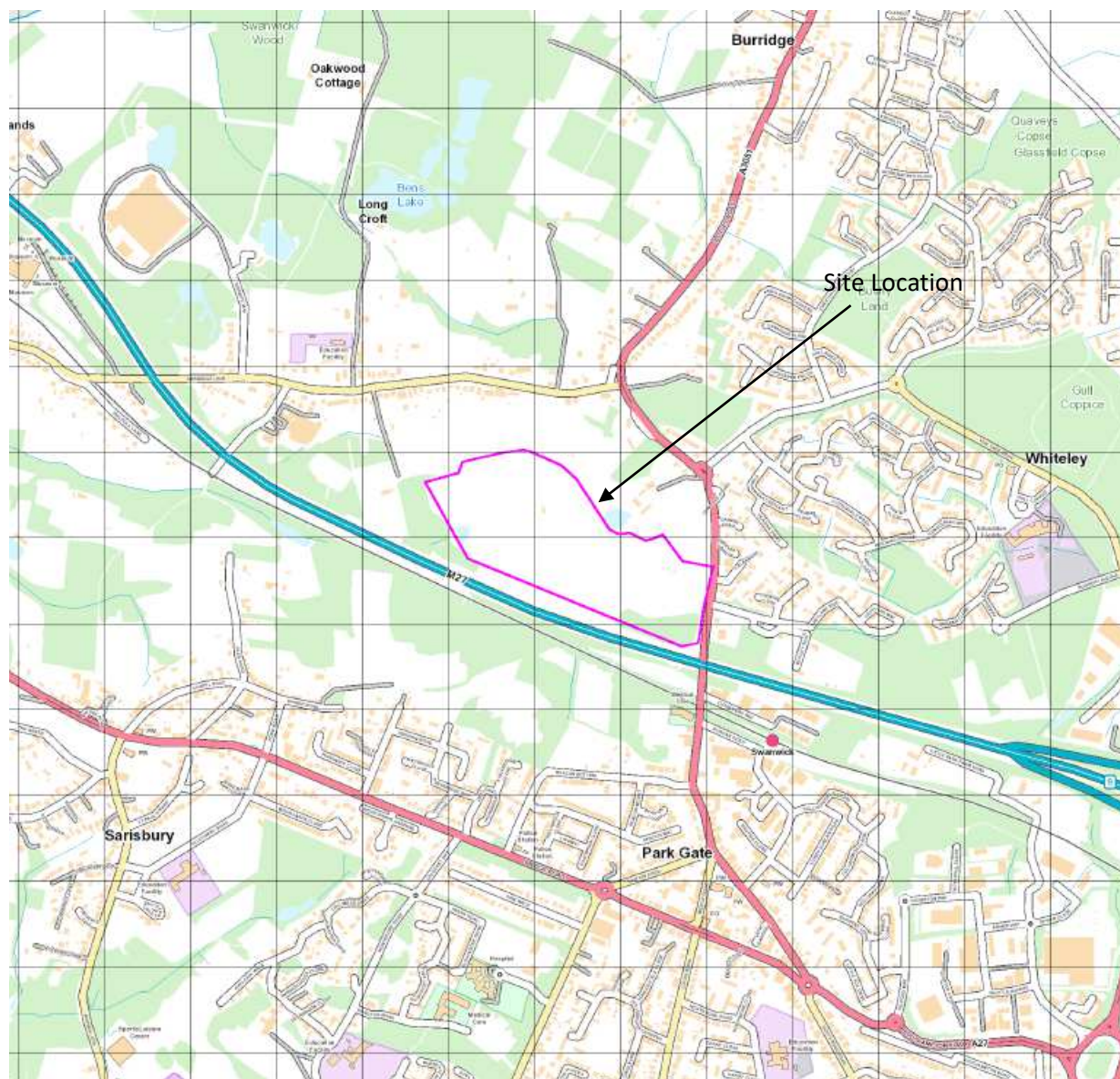
A further evaluation/investigation of the strength of the ground beneath the entire development footprint is recommended to evaluate any inconsistencies (or the corollary) within the depths of the underlying strata and to evaluate the appropriate foundation method.

### 9.4 Recommendations

Given the size of the Site, TRC considers that further investigation may be required to further characterise environmental and geotechnical conditions. Further works should be undertaken following finalisation of the proposed development design to ensure that the supplementary works can be carried out to specifically gap fill the data set.

.

## **Annex A: Figures**



Plan from Envirocheck Report



CLIENT: RAYMOND BROWN MINERALS AND RECYCLING LIMITED		DRAWN BY: TSR	PROJECT NO.: 291027.0000.0000	DATE: APRIL 2018	ROOKERY FARM, SWANWICK	
<div><div>175 – 185 Gray’s Inn Road London, WC1X 8UE <a href="http://www.trcsolutions.com/">http://www.trcsolutions.com/</a></div></div>		<div><p><i>Data Copyright © 2012, TRC Environmental, Inc. This map does not represent a legal document. It is intended to serve as an aid in graphical representation only. Information shown on this map is not warranted for accuracy or fitness for any particular purpose.</i></p></div>				FIGURE: <div>1</div>

FIGURE:

1





CLIENT: <b>RAYMOND BROWN RECYCLING AND MINERALS LTD</b>	DRAWN BY: <b>TSR</b>	PROJECT NO.: <b>289128.0000.0000</b>	DATE: <b>APRIL 2018</b>	<b>BOREHOLE LOCATION PLAN</b>	
 175 – 185 Gray's Inn Road London, WC1X 8UE <a href="http://www.trcsolutions.com/">http://www.trcsolutions.com/</a>	Data Copyright © 2012, TRC Environmental, Inc. This map does not represent a legal document. It is intended to serve as an aid in graphical representation only. Information shown on this map is not warranted for accuracy or fitness for any particular purpose.				FIGURE: <div>2</div>

## **Annex B: Exploratory Hole Logs**



# WINDOW SAMPLE LOG

WINDOW SAMPLE NO. WS101

Page 1 of 1

Facility/Project Name: <b>Rookery Farm, Swanwick</b>		Date Drilling Started: <b>26/3/18</b>	Date Drilling Completed: <b>26/3/18</b>	Project Number: <b>289128</b>
Drilling Firm:	Drilling Method:	Surface Elev. (m) ---	TOC Elevation (m) ---	Total Depth (m bgs) <b>5.0</b>
Window Sample Location:		Personnel Logged By - Driller -		Drilling Equipment:
Civil Town/City/or Village:	County: <b>Hampshire</b>	Water Level Observations: While Drilling:      Date/Time After Drilling:      Date/Time		Depth (m bgs) Depth (m bgs)

SAMPLE		BLOW COUNTS	DEPTH IN METERS	LITHOLOGIC DESCRIPTION	USCS	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
NUMBER AND TYPE	RECOVERY (%)							
1 LAB				MADE GROUND: Firm becoming very stiff then firm orangish brown to dark brown to grey, silty, slightly sand, slightly gravelly CLAY. Sand is fine to coarse. Gravel is subangular to subrounded fine to coarse brick, concrete, ceramic tiles, breeze blocks, asphalt and ash.				
2 CS								
6 SPT		13	1					... At 1.20m bgl: firm.
3 LAB								... Between 1.0m to 4.0m bgl: occasional pockets of sandy silt or sand, with a slight organic odour.
7 SPT		32	2					... At 2.00m bgl: very stiff.
4 LAB				Soft to firm orangish brown grey very sandy slightly gravelly very silty CLAY, with occasional grey mottling.				
8 SPT		13	3					... At 3.00m bgl: firm.
9 SPT		11	4					... At 4.00m bgl: firm.
5 LAB								
6 CS								
10 SPT		11	5					

WINDOW SAMPLE LOG (METRIC) LOGS.GPJ 25/4/18

Signature:	Firm: <b>TRC Solutions</b>	Fax
------------	----------------------------	-----



# WINDOW SAMPLE LOG

WINDOW SAMPLE NO. WS102

Page 1 of 1

Facility/Project Name: <b>Rookery Farm, Swanwick</b>		Date Drilling Started: <b>26/3/18</b>	Date Drilling Completed: <b>26/3/18</b>	Project Number: <b>289128</b>
Drilling Firm:	Drilling Method:	Surface Elev. (m) ---	TOC Elevation (m) ---	Total Depth (m bgs) <b>5.0</b>
Window Sample Location:		Personnel Logged By - Driller -		Drilling Equipment:
Civil Town/City/or Village:	County: <b>Hampshire</b>	Water Level Observations: While Drilling:      Date/Time After Drilling:      Date/Time		Depth (m bgs) Depth (m bgs)

SAMPLE		BLOW COUNTS	DEPTH IN METERS	LITHOLOGIC DESCRIPTION	USCS	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
NUMBER AND TYPE	RECOVERY (%)							
1 LAB				MADE GROUND: Brown sandy silty CLAY, with vegetation and rootlets. MADE GROUND: Very stiff becoming soft orangish brown to dark brown to grey, silty, slightly sand, slightly gravelly CLAY. Sand is fine to coarse. Gravel is subangular to subrounded fine to coarse brick, concrete, breeze blocks and asphalt.				
2 CS								
3 LAB								
6 SPT		39	1					
7 SPT		7	2					
8 SPT			3	Firm orangish brown very sandy very silty CLAY.				
4 LAB		13						
5 CS								
9 SPT		14	4					
10 SPT		13	5					

WINDOW SAMPLE LOG (METRIC) LOGS.GPJ 25/4/18

Signature:	Firm: <b>TRC Solutions</b>	Fax
------------	----------------------------	-----



Signature:	Firm: TRC Solutions	Fax
------------	---------------------	-----



# WINDOW SAMPLE LOG

WINDOW SAMPLE NO. WS104

Page 1 of 1

Facility/Project Name: <b>Rookery Farm, Swanwick</b>		Date Drilling Started: <b>26/3/18</b>	Date Drilling Completed: <b>26/3/18</b>	Project Number: <b>289128</b>	
Drilling Firm:	Drilling Method:	Surface Elev. (m) ---	TOC Elevation (m) ---	Total Depth (m bgs) <b>1.3</b>	Borehole Dia. (cm)
Window Sample Location:		Personnel Logged By - Driller -		Drilling Equipment:	
Civil Town/City/or Village:	County: <b>Hampshire</b>	Water Level Observations: While Drilling:      Date/Time After Drilling:      Date/Time		Depth (m bgs) Depth (m bgs)	

SAMPLE		BLOW COUNTS	DEPTH IN METERS	LITHOLOGIC DESCRIPTION	USCS	GRAPHIC LOG	WELL DIAGRAM	COMMENTS
NUMBER AND TYPE	RECOVERY (%)							
1 LAB 2 CS		50	1	MADE GROUND: Very stiff dark brown slightly gravelly SILT with occasional polythene fragments. Gravel is angular to rounded fine to coarse asphalt, concrete, flint and brick, with rare ash and wood fragments.				... Between 0.0m to 1.3m bgl: occasional pale yellow brown sandy silt and sand.
3 LAB 5 SPT								
4 LAB 6 SPT		50						... At 1.3m bgl: hole terminated due to a refusal.
			2					
			3					
			4					
			5					

WINDOW SAMPLE LOG (METRIC) LOGS.GPJ 25/4/18

Signature:	Firm: <b>TRC Solutions</b>	Fax
------------	----------------------------	-----



## **Annex C: Field Data**

# Ground Gas and Groundwater Monitoring Record Sheet

## JOB DETAILS:

Client: TRC  
Site: Swanwick  
Date: 03/04/2018

Quote No: Q2017  
Visit No: 1 of 1  
Operator: Brian Cronin

Project Manager: Phil Sanders



	GAS CONCENTRATIONS												VOLATILES		FLOW DATA			WELL AND WATER DATA		Comments	
Monitoring Point	Methane (%v/v)		%LEL		Carbon dioxide (%v/v)		Carbon monoxide (ppmv)		Hydrogen sulphide (ppmv)		Oxygen (%v/v)		PID Peak (ppm)	Product thickness (mm)	Flow rate (l/hr)		Differential borehole Pressure (Pa)	Time for flow to equalise (secs)	Water level (mbgl)		Depth of well (m)
	Peak	Steady	Peak	Steady	Peak	Steady	Peak	Steady	Peak	Steady	Min.	Steady			Peak	Steady					
WS1	ND	ND	ND	ND	3.1	3.1	ND	ND	ND	ND	11.8	11.8	8.9	ND	0.0	0.0	0	30	2.85		4.04
WS2	ND	ND	ND	ND	0.1	0.1	ND	ND	ND	ND	20.8	20.8	6.2	ND	-0.1	-0.1	0	30	0.53	1.65	
WS3	11.6	11.6	>>>	>>>	0.0	0.0	105	105	10	10	7.1	7.1	1.6	ND	-1.4	-1.4	2	60	2.88	4.05	
WS4	10.8	10.8	>>>	>>>	0.0	0.0	26	26	2	2	7.7	7.7	1.2	ND	1.3	1.2	18	60	0.63	1.30	
Max	11.6	11.6	ND	ND	3.1	3.1	105	105	10	10	20.8	20.8	NR	ND	1.3	1.2	18	60	2.88	4.05	
Min	ND	ND	ND	ND	0.0	0.0	ND	ND	ND	ND	7.1	7.1	NR	ND	-1.4	-1.4	0.1	30	0.53	1.30	

ND - Not detected

NR - Not recorded

NA - Non applicable

## METEOROLOGICAL AND SITE INFORMATION:

(Select correct box with X or enter data, as applicable)

State of ground: ☐ Dry ☐ Moist ☒ Wet ☐ Snow ☐ Frozen  
Wind: ☐ Calm ☐ Light ☒ Moderate ☐ Strong  
Cloud cover: ☐ None ☐ Slight ☐ Cloudy ☒ Overcast  
Precipitation: ☐ None ☒ Slight ☐ Moderate ☐ Heavy  
Time monitoring performed: ☐ 10:15 Start ☐ 14:30 End  
Barometric pressure (mbar): ☐ 991 Start ☐ 991 End  
Pressure trend (Daily): ☐ Falling ☒ Steady ☐ Rising  
Source: ☐ Met Office  
Air Temperature (Deg. C): ☐ 10.9 Before ☐ 11.3 After

## INSTRUMENTATION TECHNICAL SPECIFICATIONS:

Ground gas meter: 500672  
Gas Range: CH<sub>4</sub> 0 - 100% CO<sub>2</sub> 0 - 100% O<sub>2</sub> 0 - 25%  
Gas Flow range: +100/-50 l/hour  
Differential Pressure: (+/-) 1000 Pa  
Date of last calibration: 18/10/2017  
Date of next calibration: 18/04/2018

Ambient air check: CH<sub>4</sub>  CO<sub>2</sub>  O<sub>2</sub>

## **Annex D: Laboratory Chemical Data**



Stephanie Nichols  
TRC Companies Ltd  
175 - 185 Gray's Inn Road  
London  
WC1X 8UE

**DETS Ltd**  
Unit 1  
Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Kent  
ME17 2JN  
t: 01622 850410

## **QTS Environmental Report No: 18-72887**

**Site Reference:** Rookery Farm

**Project / Job Ref:** 289128

**Order No:** C289128

**Sample Receipt Date:** 28/03/2018

**Sample Scheduled Date:** 28/03/2018

**Report Issue Number:** 1

**Reporting Date:** 05/04/2018

**Authorised by:**

Russell Jarvis  
Associate Director of Client Services

**Authorised by:**

Dave Ashworth  
Deputy Quality Manager

QTS Environmental is the trading name of DETS Ltd, company registration number 03705645



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



<b>Soil Analysis Certificate</b>						
<b>QTS Environmental Report No: 18-72887</b>	<b>Date Sampled</b>	26/03/18	26/03/18	26/03/18	26/03/18	26/03/18
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS1	WS1	WS2	WS2	WS3
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
<b>Order No: C289128</b>	<b>Depth (m)</b>	0.50 - 0.60	4.70 - 4.90	0.90 - 1.00	3.20 - 3.40	0.10 - 0.20
<b>Reporting Date: 05/04/2018</b>	<b>QTSE Sample No</b>	324885	324886	324887	324888	324889

<b>Determinand</b>	<b>Unit</b>	<b>RL</b>	<b>Accreditation</b>					
Asbestos Screen <sup>(S)</sup>	N/a	N/a	<b>ISO17025</b>	Not Detected	Not Detected	Not Detected	Not Detected	Not Detected
Arsenic (As)	mg/kg	< 2	<b>MCERTS</b>	8	9	7	10	8
W/S Boron	mg/kg	< 1	NONE	< 1	< 1	< 1	< 1	< 1
Cadmium (Cd)	mg/kg	< 0.2	<b>MCERTS</b>	0.2	< 0.2	< 0.2	< 0.2	< 0.2
Chromium (Cr)	mg/kg	< 2	<b>MCERTS</b>	21	22	17	25	16
Chromium (hexavalent)	mg/kg	< 2	NONE	< 2	< 2	< 2	< 2	< 2
Copper (Cu)	mg/kg	< 4	<b>MCERTS</b>	36	11	13	10	19
Lead (Pb)	mg/kg	< 3	<b>MCERTS</b>	686	318	138	70	110
Mercury (Hg)	mg/kg	< 1	NONE	< 1	< 1	< 1	< 1	< 1
Nickel (Ni)	mg/kg	< 3	<b>MCERTS</b>	11	12	7	15	11
Selenium (Se)	mg/kg	< 3	NONE	< 3	< 3	< 3	< 3	< 3
Zinc (Zn)	mg/kg	< 3	<b>MCERTS</b>	104	42	54	39	86

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C  
Subcontracted analysis (S)



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



Soil Analysis Certificate						
<b>QTS Environmental Report No: 18-72887</b>	<b>Date Sampled</b>	26/03/18	26/03/18	26/03/18		
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied		
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS3	WS3	WS4		
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied		
<b>Order No: C289128</b>	<b>Depth (m)</b>	2.70 - 2.80	3.60 - 3.70	1.20		
<b>Reporting Date: 05/04/2018</b>	<b>QTSE Sample No</b>	324890	324891	324893		

Determinand	Unit	RL	Accreditation					
Asbestos Screen <sup>(S)</sup>	N/a	N/a	ISO17025	Not Detected	Not Detected	Not Detected		
Arsenic (As)	mg/kg	< 2	MCERTS	7	8	6		
W/S Boron	mg/kg	< 1	NONE	< 1	< 1	< 1		
Cadmium (Cd)	mg/kg	< 0.2	MCERTS	0.3	< 0.2	0.3		
Chromium (Cr)	mg/kg	< 2	MCERTS	15	18	15		
Chromium (hexavalent)	mg/kg	< 2	NONE	< 2	< 2	< 2		
Copper (Cu)	mg/kg	< 4	MCERTS	18	10	15		
Lead (Pb)	mg/kg	< 3	MCERTS	65	35	53		
Mercury (Hg)	mg/kg	< 1	NONE	< 1	< 1	< 1		
Nickel (Ni)	mg/kg	< 3	MCERTS	7	9	9		
Selenium (Se)	mg/kg	< 3	NONE	< 3	< 3	< 3		
Zinc (Zn)	mg/kg	< 3	MCERTS	50	39	72		

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C  
Subcontracted analysis (S)





**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



Soil Analysis Certificate - Speciated PAHs						
QTS Environmental Report No: 18-72887	Date Sampled	26/03/18	26/03/18	26/03/18	26/03/18	26/03/18
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Site Reference: Rookery Farm	TP / BH No	WS1	WS1	WS2	WS2	WS3
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Order No: C289128	Depth (m)	0.50 - 0.60	4.70 - 4.90	0.90 - 1.00	3.20 - 3.40	0.10 - 0.20
Reporting Date: 05/04/2018	QTSE Sample No	324885	324886	324887	324888	324889

Determinand	Unit	RL	Accreditation					
Naphthalene	mg/kg	< 0.1	MCERTS	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
Acenaphthylene	mg/kg	< 0.1	MCERTS	< 0.1	< 0.1	0.38	< 0.1	< 0.1
Acenaphthene	mg/kg	< 0.1	MCERTS	0.23	< 0.1	0.20	< 0.1	< 0.1
Fluorene	mg/kg	< 0.1	MCERTS	0.19	< 0.1	0.54	< 0.1	< 0.1
Phenanthrene	mg/kg	< 0.1	MCERTS	1.63	< 0.1	5.58	< 0.1	0.29
Anthracene	mg/kg	< 0.1	MCERTS	0.51	< 0.1	1.01	< 0.1	< 0.1
Fluoranthene	mg/kg	< 0.1	MCERTS	3.29	< 0.1	4.99	< 0.1	0.75
Pyrene	mg/kg	< 0.1	MCERTS	2.81	< 0.1	3.91	< 0.1	0.74
Benzo(a)anthracene	mg/kg	< 0.1	MCERTS	1.74	< 0.1	2	< 0.1	0.48
Chrysene	mg/kg	< 0.1	MCERTS	1.52	< 0.1	1.69	< 0.1	0.43
Benzo(b)fluoranthene	mg/kg	< 0.1	MCERTS	2.12	< 0.1	2.05	< 0.1	0.70
Benzo(k)fluoranthene	mg/kg	< 0.1	MCERTS	0.71	< 0.1	0.69	< 0.1	0.29
Benzo(a)pyrene	mg/kg	< 0.1	MCERTS	1.75	< 0.1	1.69	< 0.1	0.61
Indeno(1,2,3-cd)pyrene	mg/kg	< 0.1	MCERTS	1.16	< 0.1	1.05	< 0.1	0.39
Dibenz(a,h)anthracene	mg/kg	< 0.1	MCERTS	0.21	< 0.1	0.19	< 0.1	< 0.1
Benzo(ghi)perylene	mg/kg	< 0.1	MCERTS	1	< 0.1	0.84	< 0.1	0.33
Total EPA-16 PAHs	mg/kg	< 1.6	MCERTS	18.9	< 1.6	26.8	< 1.6	5

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C



DETS Ltd  
Unit 1, Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Maidstone  
Kent ME17 2JN  
Tel : 01622 850410



Soil Analysis Certificate - Speciated PAHs						
QTS Environmental Report No: 18-72887	Date Sampled	26/03/18	26/03/18	26/03/18		
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied		
Site Reference: Rookery Farm	TP / BH No	WS3	WS3	WS4		
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied		
Order No: C289128	Depth (m)	2.70 - 2.80	3.60 - 3.70	1.20		
Reporting Date: 05/04/2018	QTSE Sample No	324890	324891	324893		

Determinand	Unit	RL	Accreditation				
Naphthalene	mg/kg	< 0.1	MCERTS	0.19	< 0.1	< 0.1	
Acenaphthylene	mg/kg	< 0.1	MCERTS	< 0.1	< 0.1	< 0.1	
Acenaphthene	mg/kg	< 0.1	MCERTS	0.89	< 0.1	< 0.1	
Fluorene	mg/kg	< 0.1	MCERTS	0.89	< 0.1	< 0.1	
Phenanthrene	mg/kg	< 0.1	MCERTS	4.66	< 0.1	0.39	
Anthracene	mg/kg	< 0.1	MCERTS	1.22	< 0.1	< 0.1	
Fluoranthene	mg/kg	< 0.1	MCERTS	5.42	< 0.1	0.53	
Pyrene	mg/kg	< 0.1	MCERTS	4.06	< 0.1	0.40	
Benzo(a)anthracene	mg/kg	< 0.1	MCERTS	2.35	< 0.1	0.20	
Chrysene	mg/kg	< 0.1	MCERTS	1.96	< 0.1	0.17	
Benzo(b)fluoranthene	mg/kg	< 0.1	MCERTS	2.49	< 0.1	0.22	
Benzo(k)fluoranthene	mg/kg	< 0.1	MCERTS	0.84	< 0.1	< 0.1	
Benzo(a)pyrene	mg/kg	< 0.1	MCERTS	1.91	< 0.1	0.16	
Indeno(1,2,3-cd)pyrene	mg/kg	< 0.1	MCERTS	1.20	< 0.1	0.11	
Dibenz(a,h)anthracene	mg/kg	< 0.1	MCERTS	0.23	< 0.1	< 0.1	
Benzo(ghi)perylene	mg/kg	< 0.1	MCERTS	0.94	< 0.1	< 0.1	
Total EPA-16 PAHs	mg/kg	< 1.6	MCERTS	29.3	< 1.6	2.2	

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



**Soil Analysis Certificate - TPH CWG Banded**

<b>QTS Environmental Report No: 18-72887</b>	<b>Date Sampled</b>	26/03/18	26/03/18	26/03/18	26/03/18	26/03/18
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS1	WS1	WS2	WS2	WS3
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
<b>Order No: C289128</b>	<b>Depth (m)</b>	0.50 - 0.60	4.70 - 4.90	0.90 - 1.00	3.20 - 3.40	0.10 - 0.20
<b>Reporting Date: 05/04/2018</b>	<b>QTSE Sample No</b>	324885	324886	324887	324888	324889

Determinand	Unit	RL	Accreditation					
Aliphatic >C5 - C6	mg/kg	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Aliphatic >C6 - C8	mg/kg	< 0.05	NONE	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05
Aliphatic >C8 - C10	mg/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
Aliphatic >C10 - C12	mg/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
Aliphatic >C12 - C16	mg/kg	< 3	MCERTS	< 3	< 3	< 3	< 3	< 3
Aliphatic >C16 - C21	mg/kg	< 3	MCERTS	14	< 3	< 3	< 3	< 3
Aliphatic >C21 - C34	mg/kg	< 10	MCERTS	14	< 10	32	< 10	< 10
Aliphatic (C5 - C34)	mg/kg	< 21	NONE	28	< 21	32	< 21	< 21
Aromatic >C5 - C7	mg/kg	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Aromatic >C7 - C8	mg/kg	< 0.05	NONE	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05
Aromatic >C8 - C10	mg/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
Aromatic >C10 - C12	mg/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
Aromatic >C12 - C16	mg/kg	< 2	MCERTS	< 2	< 2	2	< 2	< 2
Aromatic >C16 - C21	mg/kg	< 3	MCERTS	34	< 3	27	< 3	5
Aromatic >C21 - C35	mg/kg	< 10	MCERTS	124	< 10	107	< 10	28
Aromatic (C5 - C35)	mg/kg	< 21	NONE	158	< 21	136	< 21	33
Total >C5 - C35	mg/kg	< 42	NONE	186	< 42	168	< 42	< 42

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



**Soil Analysis Certificate - TPH CWG Banded**

<b>QTS Environmental Report No: 18-72887</b>	<b>Date Sampled</b>	26/03/18	26/03/18	26/03/18		
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied		
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS3	WS3	WS4		
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied		
<b>Order No: C289128</b>	<b>Depth (m)</b>	2.70 - 2.80	3.60 - 3.70	1.20		
<b>Reporting Date: 05/04/2018</b>	<b>QTSE Sample No</b>	324890	324891	324893		

Determinand	Unit	RL	Accreditation					
Aliphatic >C5 - C6	mg/kg	< 0.01	NONE	< 0.01	< 0.01	< 0.01		
Aliphatic >C6 - C8	mg/kg	< 0.05	NONE	< 0.05	< 0.05	< 0.05		
Aliphatic >C8 - C10	mg/kg	< 2	MCERTS	< 2	< 2	< 2		
Aliphatic >C10 - C12	mg/kg	< 2	MCERTS	< 2	< 2	< 2		
Aliphatic >C12 - C16	mg/kg	< 3	MCERTS	< 3	< 3	< 3		
Aliphatic >C16 - C21	mg/kg	< 3	MCERTS	< 3	< 3	< 3		
Aliphatic >C21 - C34	mg/kg	< 10	MCERTS	< 10	< 10	44		
Aliphatic (C5 - C34)	mg/kg	< 21	NONE	< 21	< 21	44		
Aromatic >C5 - C7	mg/kg	< 0.01	NONE	< 0.01	< 0.01	< 0.01		
Aromatic >C7 - C8	mg/kg	< 0.05	NONE	< 0.05	< 0.05	< 0.05		
Aromatic >C8 - C10	mg/kg	< 2	MCERTS	< 2	< 2	< 2		
Aromatic >C10 - C12	mg/kg	< 2	MCERTS	< 2	< 2	< 2		
Aromatic >C12 - C16	mg/kg	< 2	MCERTS	8	< 2	< 2		
Aromatic >C16 - C21	mg/kg	< 3	MCERTS	29	< 3	6		
Aromatic >C21 - C35	mg/kg	< 10	MCERTS	93	< 10	< 10		
Aromatic (C5 - C35)	mg/kg	< 21	NONE	130	< 21	< 21		
Total >C5 - C35	mg/kg	< 42	NONE	130	< 42	51		

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C



DETS Ltd  
Unit 1, Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Maidstone  
Kent ME17 2JN  
Tel : 01622 850410



Soil Analysis Certificate - BTEX / MTBE						
QTS Environmental Report No: 18-72887	Date Sampled	26/03/18	26/03/18	26/03/18	26/03/18	26/03/18
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Site Reference: Rookery Farm	TP / BH No	WS1	WS1	WS2	WS2	WS3
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Order No: C289128	Depth (m)	0.50 - 0.60	4.70 - 4.90	0.90 - 1.00	3.20 - 3.40	0.10 - 0.20
Reporting Date: 05/04/2018	QTSE Sample No	324885	324886	324887	324888	324889

Determinand	Unit	RL	Accreditation					
Benzene	ug/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
Toluene	ug/kg	< 5	MCERTS	< 5	< 5	< 5	< 5	< 5
Ethylbenzene	ug/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
p & m-xylene	ug/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
o-xylene	ug/kg	< 2	MCERTS	< 2	< 2	< 2	< 2	< 2
MTBE	ug/kg	< 5	MCERTS	< 5	< 5	< 5	< 5	< 5

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C



DETS Ltd  
Unit 1, Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Maidstone  
Kent ME17 2JN  
Tel : 01622 850410



Soil Analysis Certificate - BTEX / MTBE						
QTS Environmental Report No: 18-72887	Date Sampled	26/03/18	26/03/18	26/03/18		
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied		
Site Reference: Rookery Farm	TP / BH No	WS3	WS3	WS4		
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied		
Order No: C289128	Depth (m)	2.70 - 2.80	3.60 - 3.70	1.20		
Reporting Date: 05/04/2018	QTSE Sample No	324890	324891	324893		

Determinand	Unit	RL	Accreditation					
Benzene	ug/kg	< 2	MCERTS	< 2	< 2	< 2		
Toluene	ug/kg	< 5	MCERTS	< 5	< 5	< 5		
Ethylbenzene	ug/kg	< 2	MCERTS	< 2	< 2	< 2		
p & m-xylene	ug/kg	< 2	MCERTS	< 2	< 2	< 2		
o-xylene	ug/kg	< 2	MCERTS	< 2	< 2	< 2		
MTBE	ug/kg	< 5	MCERTS	< 5	< 5	< 5		

Analytical results are expressed on a dry weight basis where samples are assisted-dried at less than 30°C







DETS Ltd  
Unit 1, Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Maidstone  
Kent ME17 2JN  
Tel : 01622 850410



#### Soil Analysis Certificate - Sample Descriptions

QTS Environmental Report No: 18-72887

TRC Companies Ltd

Site Reference: Rookery Farm

Project / Job Ref: 289128

Order No: C289128

Reporting Date: 05/04/2018

QTSE Sample No	TP / BH No	Additional Refs	Depth (m)	Moisture Content (%)	Sample Matrix Description
324885	WS1	None Supplied	0.50 - 0.60	9.6	Brown sandy clay with stones and concrete
324886	WS1	None Supplied	4.70 - 4.90	15.7	Brown sandy clay
324887	WS2	None Supplied	0.90 - 1.00	8.7	Brown sandy clay with brick and concrete
324888	WS2	None Supplied	3.20 - 3.40	17.4	Brown sandy clay
324889	WS3	None Supplied	0.10 - 0.20	12.5	Brown sandy clay with brick and concrete
324890	WS3	None Supplied	2.70 - 2.80	12.6	Brown sandy clay with brick and concrete
324891	WS3	None Supplied	3.60 - 3.70	19.8	Blue sandy clay
324892	WS4	- 0.20, 0.60 - 0.70)	None Supplied	8.9	Black sandy clay with brick
324893	WS4	None Supplied	1.20	5.4	Brown sandy clay with stones and concrete

Moisture content is part of procedure E003 & is not an accredited test

Insufficient Sample <sup>1/5</sup>

& samples received in inappropriate containers for hydrocarbon analysis



DETS Ltd  
Unit 1, Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Maidstone  
Kent ME17 2JN  
Tel : 01622 850410



#### Soil Analysis Certificate - Methodology & Miscellaneous Information

QTS Environmental Report No: 18-72887

TRC Companies Ltd

Site Reference: Rookery Farm

Project / Job Ref: 289128

Order No: C289128

Reporting Date: 05/04/2018

Matrix	Analysed On	Determinand	Brief Method Description	Method No
Soil	D	Boron - Water Soluble	Determination of water soluble boron in soil by 2:1 hot water extract followed by ICP-OES	E012
Soil	AR	BTEX	Determination of BTEX by headspace GC-MS	E001
Soil	D	Cations	Determination of cations in soil by aqua-regia digestion followed by ICP-OES	E002
Soil	D	Chloride - Water Soluble (2:1)	Determination of chloride by extraction with water & analysed by ion chromatography	E009
Soil	AR	Chromium - Hexavalent	Determination of hexavalent chromium in soil by extraction in water then by acidification, addition of 1,5 diphenylcarbazide followed by colorimetry	E016
Soil	AR	Cyanide - Complex	Determination of complex cyanide by distillation followed by colorimetry	E015
Soil	AR	Cyanide - Free	Determination of free cyanide by distillation followed by colorimetry	E015
Soil	AR	Cyanide - Total	Determination of total cyanide by distillation followed by colorimetry	E015
Soil	D	Cyclohexane Extractable Matter (CEM)	Gravimetrically determined through extraction with cyclohexane	E011
Soil	AR	Diesel Range Organics (C10 - C24)	Determination of hexane/acetone extractable hydrocarbons by GC-FID	E004
Soil	AR	Electrical Conductivity	Determination of electrical conductivity by addition of saturated calcium sulphate followed by electrometric measurement	E022
Soil	AR	Electrical Conductivity	Determination of electrical conductivity by addition of water followed by electrometric measurement	E023
Soil	D	Elemental Sulphur	Determination of elemental sulphur by solvent extraction followed by GC-MS	E020
Soil	AR	EPH (C10 - C40)	Determination of acetone/hexane extractable hydrocarbons by GC-FID	E004
Soil	AR	EPH Product ID	Determination of acetone/hexane extractable hydrocarbons by GC-FID	E004
Soil	AR	EPH TEXAS (C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C40)	Determination of acetone/hexane extractable hydrocarbons by GC-FID for C8 to C40. C6 to C8 by headspace GC-MS	E004
Soil	D	Fluoride - Water Soluble	Determination of Fluoride by extraction with water & analysed by ion chromatography	E009
Soil	D	FOC (Fraction Organic Carbon)	Determination of fraction of organic carbon by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	D	Loss on Ignition @ 450°C	Determination of loss on ignition in soil by gravimetrically with the sample being ignited in a muffle furnace	E019
Soil	D	Magnesium - Water Soluble	Determination of water soluble magnesium by extraction with water followed by ICP-OES	E025
Soil	D	Metals	Determination of metals by aqua-regia digestion followed by ICP-OES	E002
Soil	AR	Mineral Oil (C10 - C40)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge	E004
Soil	AR	Moisture Content	Moisture content; determined gravimetrically	E003
Soil	D	Nitrate - Water Soluble (2:1)	Determination of nitrate by extraction with water & analysed by ion chromatography	E009
Soil	D	Organic Matter	Determination of organic matter by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	AR	PAH - Speciated (EPA 16)	Determination of PAH compounds by extraction in acetone and hexane followed by GC-MS with the use of surrogate and internal standards	E005
Soil	AR	PCB - 7 Congeners	Determination of PCB by extraction with acetone and hexane followed by GC-MS	E008
Soil	D	Petroleum Ether Extract (PEE)	Gravimetrically determined through extraction with petroleum ether	E011
Soil	AR	pH	Determination of pH by addition of water followed by electrometric measurement	E007
Soil	AR	Phenols - Total (monohydric)	Determination of phenols by distillation followed by colorimetry	E021
Soil	D	Phosphate - Water Soluble (2:1)	Determination of phosphate by extraction with water & analysed by ion chromatography	E009
Soil	D	Sulphate (as SO <sub>4</sub> ) - Total	Determination of total sulphate by extraction with 10% HCl followed by ICP-OES	E013
Soil	D	Sulphate (as SO <sub>4</sub> ) - Water Soluble (2:1)	Determination of sulphate by extraction with water & analysed by ion chromatography	E009
Soil	D	Sulphate (as SO <sub>4</sub> ) - Water Soluble (2:1)	Determination of water soluble sulphate by extraction with water followed by ICP-OES	E014
Soil	AR	Sulphide	Determination of sulphide by distillation followed by colorimetry	E018
Soil	D	Sulphur - Total	Determination of total sulphur by extraction with aqua-regia followed by ICP-OES	E024
Soil	AR	SVOC	Determination of semi-volatile organic compounds by extraction in acetone and hexane followed by GC-MS	E006
Soil	AR	Thiocyanate (as SCN)	Determination of thiocyanate by extraction in caustic soda followed by acidification followed by addition of ferric nitrate followed by colorimetry	E017
Soil	D	Toluene Extractable Matter (TEM)	Gravimetrically determined through extraction with toluene	E011
Soil	D	Total Organic Carbon (TOC)	Determination of organic matter by oxidising with potassium dichromate followed by titration with iron (II) sulphate	E010
Soil	AR	TPH CWG (ali: C5- C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C34, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge for C8 to C35. C5 to C8 by headspace GC-MS	E004
Soil	AR	TPH LQM (ali: C5-C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C35, C35-C44, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35, C35-C44)	Determination of hexane/acetone extractable hydrocarbons by GC-FID fractionating with SPE cartridge for C8 to C44. C5 to C8 by headspace GC-MS	E004
Soil	AR	VOCs	Determination of volatile organic compounds by headspace GC-MS	E001
Soil	AR	VPH (C6-C8 & C8-C10)	Determination of hydrocarbons C6-C8 by headspace GC-MS & C8-C10 by GC-FID	E001

D Dried  
AR As Received



Stephanie Nichols  
TRC Companies Ltd  
175 - 185 Gray's Inn Road  
London  
WC1X 8UE

**DETS Ltd**  
Unit 1  
Rose Lane Industrial Estate  
Rose Lane  
Lenham Heath  
Kent  
ME17 2JN  
t: 01622 850410  
[russell.jarvis@qtsenvironmental.com](mailto:russell.jarvis@qtsenvironmental.com)

## **DETS Report No: 18-73258**

**Site Reference:** Rookery Farm

**Project / Job Ref:** 289128

**Order No:** C289128

**Sample Receipt Date:** 06/04/2018

**Sample Scheduled Date:** 06/04/2018

**Report Issue Number:** 1

**Reporting Date:** 12/04/2018

**Authorised by:**

Kevin Old  
Associate Director of Laboratory

**Authorised by:**

Dave Ashworth  
Deputy Quality Manager



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



Water Analysis Certificate						
<b>QTS Environmental Report No: 18-73258</b>	<b>Date Sampled</b>	03/04/18	03/04/18	03/04/18	03/04/18	
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied	None Supplied	
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS1	WS2	WS3	WS4	
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied	None Supplied	
<b>Order No: C289128</b>	<b>Depth (m)</b>	None Supplied	None Supplied	None Supplied	None Supplied	
<b>Reporting Date: 12/04/2018</b>	<b>QTSE Sample No</b>	326500	326501	326502	326503	

Determinand	Unit	RL	Accreditation	(hs)			
pH	pH Units	N/a	ISO17025	7.6	8.1	7.0	11.2
Ammoniacal Nitrogen as NH <sub>4</sub>	ug/l	< 50	NONE	1540	3590	23600	15000
Nitrate as NO <sub>3</sub>	mg/l	< 0.5	ISO17025	1.5	< 0.5	4.6	1.6
Nitrite as NO <sub>2</sub>	mg/l	< 0.5	NONE	< 0.5	< 0.5	< 0.5	< 0.5
Chemical Oxygen Demand	mg/l	< 5	NONE	72	98	178	165
Biological Oxygen Demand	mg/l	< 5	NONE	7	8	139	45
Arsenic (dissolved)	ug/l	< 5	ISO17025	< 5	7	11	10
Boron (dissolved)	ug/l	< 5	ISO17025	500	243	121	22
Cadmium (dissolved)	ug/l	< 0.4	ISO17025	< 0.4	< 0.4	< 0.4	< 0.4
Chromium (dissolved)	ug/l	< 5	ISO17025	< 5	< 5	< 5	19
Chromium (hexavalent)	ug/l	< 20	NONE	< 20	< 20	< 20	< 20
Copper (dissolved)	ug/l	< 5	ISO17025	< 5	< 5	< 5	61
Lead (dissolved)	ug/l	< 5	ISO17025	< 5	5	< 5	< 5
Mercury (dissolved)	ug/l	< 0.05	ISO17025	< 0.05	0.06	< 0.05	< 0.05
Nickel (dissolved)	ug/l	< 5	ISO17025	13	8	9	16
Selenium (dissolved)	ug/l	< 5	ISO17025	5	9	< 5	19
Zinc (dissolved)	ug/l	< 2	ISO17025	10	< 2	< 2	< 2

Subcontracted analysis <sup>(S)</sup>

Insufficient sample <sup>I/S</sup>

Unsuitable Sample <sup>U/S</sup>

(hs) Please note deviating sample due to head space in container



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**

Water Analysis Certificate - Speciated PAH						
QTS Environmental Report No: 18-73258	Date Sampled	03/04/18	03/04/18	03/04/18	03/04/18	
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied	None Supplied	
Site Reference: Rookery Farm	TP / BH No	WS1	WS2	WS3	WS4	
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	
Order No: C289128	Depth (m)	None Supplied	None Supplied	None Supplied	None Supplied	
Reporting Date: 12/04/2018	QTSE Sample No	326500	326501	326502	326503	

Determinand	Unit	RL	Accreditation	(hs)			
Naphthalene	ug/l	< 0.01	NONE	0.05	0.22	0.25	0.17
Acenaphthylene	ug/l	< 0.01	NONE	< 0.01	< 0.01	0.01	< 0.01
Acenaphthene	ug/l	< 0.01	NONE	0.02	0.06	0.17	0.07
Fluorene	ug/l	< 0.01	NONE	< 0.01	0.04	0.14	0.04
Phenanthrene	ug/l	< 0.01	NONE	< 0.01	0.07	0.22	0.15
Anthracene	ug/l	< 0.01	NONE	< 0.01	0.02	0.03	0.03
Fluoranthene	ug/l	< 0.01	NONE	0.03	0.03	0.04	0.05
Pyrene	ug/l	< 0.01	NONE	0.02	0.02	0.03	0.03
Benzo(a)anthracene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Chrysene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Benzo(b)fluoranthene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Benzo(k)fluoranthene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Benzo(a)pyrene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Indeno(1,2,3-cd)pyrene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Dibenz(a,h)anthracene	ug/l	< 0.01	NONE	< 0.01	< 0.01	< 0.01	< 0.01
Benzo(ghi)perylene	ug/l	< 0.008	NONE	< 0.008	< 0.008	< 0.008	< 0.008
Total EPA-16 PAHs	ug/l	< 0.01	NONE	0.12	0.46	0.89	0.54





**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**

**Water Analysis Certificate - TPH CWG Banded**

<b>QTS Environmental Report No: 18-73258</b>	<b>Date Sampled</b>	03/04/18	03/04/18	03/04/18	03/04/18
<b>TRC Companies Ltd</b>	<b>Time Sampled</b>	None Supplied	None Supplied	None Supplied	None Supplied
<b>Site Reference: Rookery Farm</b>	<b>TP / BH No</b>	WS1	WS2	WS3	WS4
<b>Project / Job Ref: 289128</b>	<b>Additional Refs</b>	None Supplied	None Supplied	None Supplied	None Supplied
<b>Order No: C289128</b>	<b>Depth (m)</b>	None Supplied	None Supplied	None Supplied	None Supplied
<b>Reporting Date: 12/04/2018</b>	<b>QTSE Sample No</b>	326500	326501	326502	326503

<b>Determinand</b>	<b>Unit</b>	<b>RL</b>	<b>Accreditation</b>	<b>(hs)</b>				
Aliphatic >C5 - C6	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C6 - C8	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C8 - C10	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C10 - C12	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C12 - C16	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C16 - C21	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic >C21 - C34	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aliphatic (C5 - C34)	ug/l	< 70	NONE	< 70	< 70	< 70	< 70	< 70
Aromatic >C5 - C7	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C7 - C8	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C8 - C10	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C10 - C12	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C12 - C16	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C16 - C21	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic >C21 - C35	ug/l	< 10	NONE	< 10	< 10	< 10	< 10	< 10
Aromatic (C5 - C35)	ug/l	< 70	NONE	< 70	< 70	< 70	< 70	< 70
Total >C5 - C35	ug/l	< 140	NONE	< 140	< 140	< 140	< 140	< 140

(hs) Please note deviating sample due to head space in container



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



Water Analysis Certificate - BTEX / MTBE						
QTS Environmental Report No: 18-73258	Date Sampled	03/04/18	03/04/18	03/04/18	03/04/18	
TRC Companies Ltd	Time Sampled	None Supplied	None Supplied	None Supplied	None Supplied	
Site Reference: Rookery Farm	TP / BH No	WS1	WS2	WS3	WS4	
Project / Job Ref: 289128	Additional Refs	None Supplied	None Supplied	None Supplied	None Supplied	
Order No: C289128	Depth (m)	None Supplied	None Supplied	None Supplied	None Supplied	
Reporting Date: 12/04/2018	QTSE Sample No	326500	326501	326502	326503	

Determinand	Unit	RL	Accreditation	(hs)				
Benzene	ug/l	< 1	ISO17025	< 1	< 1	< 1	< 1	< 1
Toluene	ug/l	< 5	ISO17025	< 5	< 5	< 5	< 5	< 5
Ethylbenzene	ug/l	< 5	ISO17025	< 5	< 5	< 5	< 5	< 5
p & m-xylene	ug/l	< 10	ISO17025	< 10	< 10	< 10	< 10	< 10
o-xylene	ug/l	< 5	ISO17025	< 5	< 5	< 5	< 5	< 5
MTBE	ug/l	< 10	ISO17025	< 10	< 10	< 10	< 10	< 10

(hs) Please note deviating sample due to head space in container



**DETS Ltd**  
**Unit 1, Rose Lane Industrial Estate**  
**Rose Lane**  
**Lenham Heath**  
**Maidstone**  
**Kent ME17 2JN**  
**Tel : 01622 850410**



# **Soil Analysis Certificate - Methodology & Miscellaneous Information**

**QTS Environmental Report No: 18-73258**

**TRC Companies Ltd**

**Site Reference: Rookery Farm**

**Project / Job Ref: 289128**

**Order No: C289128**

**Reporting Date: 12/04/2018**

Matrix	Analysed On	Determinand	Brief Method Description	Method No
Water	UF	Alkalinity	Determination of alkalinity by titration against hydrochloric acid using bromocresol green as the end point	E103
Water	UF	BTEX	Determination of BTEX by headspace GC-MS	E101
Water	F	Cations	Determination of cations by filtration followed by ICP-MS	E102
Water	UF	Chemical Oxygen Demand (COD)	Determination using a COD reactor followed by colorimetry	E112
Water	F	Chloride	Determination of chloride by filtration & analysed by ion chromatography	E109
Water	F	Chromium - Hexavalent	Determination of hexavalent chromium by acidification, addition of 1,5 diphenylcarbazide followed by	E116
Water	UF	Cyanide - Complex	Determination of complex cyanide by distillation followed by colorimetry	E115
Water	UF	Cyanide - Free	Determination of free cyanide by distillation followed by colorimetry	E115
Water	UF	Cyanide - Total	Determination of total cyanide by distillation followed by colorimetry	E115
Water	UF	Cyclohexane Extractable Matter (CEM)	Gravimetrically determined through liquid:liquid extraction with cyclohexane	E111
Water	F	Diesel Range Organics (C10 - C24)	Determination of liquid:liquid extraction with hexane followed by GC-FID	E104
Water	F	Dissolved Organic Content (DOC)	Determination of DOC by filtration followed by low heat with persulphate addition followed by IR detection	E110
Water	UF	Electrical Conductivity	Determination of electrical conductivity by electrometric measurement	E123
Water	F	EPH (C10 - C40)	Determination of liquid:liquid extraction with hexane followed by GC-FID	E104
Water	F	EPH TEXAS (C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C40)	Determination of liquid:liquid extraction with hexane followed by GC-FID for C8 to C40. C6 to C8 by headspace GC-MS	E104
Water	F	Fluoride	Determination of Fluoride by filtration & analysed by ion chromatography	E109
Water	F	Hardness	Determination of Ca and Mg by ICP-MS followed by calculation	E102
Leachate	F	Leachate Preparation - NRA	Based on National Rivers Authority leaching test 1994	E301
Leachate	F	Leachate Preparation - WAC	Based on BS EN 12457 Pt1, 2, 3	E302
Water	F	Metals	Determination of metals by filtration followed by ICP-MS	E102
Water	F	Mineral Oil (C10 - C40)	Determination of liquid:liquid extraction with hexane followed by GC-FID	E104
Water	F	Nitrate	Determination of nitrate by filtration & analysed by ion chromatography	E109
Water	UF	Monohydric Phenol	Determination of phenols by distillation followed by colorimetry	E121
Water	F	PAH - Speciated (EPA 16)	Determination of PAH compounds by concentration through SPE cartridge, collection in dichloromethane followed by GC-MS	E105
Water	F	PCB - 7 Congeners	Determination of PCB compounds by concentration through SPE cartridge, collection in dichloromethane followed by GC-MS	E108
Water	UF	Petroleum Ether Extract (PEE)	Gravimetrically determined through liquid:liquid extraction with petroleum ether	E111
Water	UF	pH	Determination of pH by electrometric measurement	E107
Water	F	Phosphate	Determination of phosphate by filtration & analysed by ion chromatography	E109
Water	UF	Redox Potential	Determination of redox potential by electrometric measurement	E113
Water	F	Sulphate (as SO4)	Determination of sulphate by filtration & analysed by ion chromatography	E109
Water	UF	Sulphide	Determination of sulphide by distillation followed by colorimetry	E118
Water	F	SVOC	Determination of semi-volatile organic compounds by concentration through SPE cartridge, collection in dichloromethane followed by GC-MS	E106
Water	UF	Toluene Extractable Matter (TEM)	Gravimetrically determined through liquid:liquid extraction with toluene	E111
Water	UF	Total Organic Carbon (TOC)	Low heat with persulphate addition followed by IR detection	E110
Water	F	TPH CWG (ali: C5-C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C34, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35)	Determination of liquid:liquid extraction with hexane, fractionating with SPE followed by GC-FID for C8 to C35. C5 to C8 by headspace GC-MS	E104
Water	F	TPH LQM (ali: C5-C6, C6-C8, C8-C10, C10-C12, C12-C16, C16-C35, C35-C44, aro: C5-C7, C7-C8, C8-C10, C10-C12, C12-C16, C16-C21, C21-C35, C35-C44)	Determination of liquid:liquid extraction with hexane, fractionating with SPE followed by GC-FID for C8 to C44. C5 to C8 by headspace GC-MS	E104
Water	UF	VOCs	Determination of volatile organic compounds by headspace GC-MS	E101
Water	UF	VPH (C6-C8 & C8-C10)	Determination of hydrocarbons C6-C8 by headspace GC-MS & C8-C10 by GC-FID	E101

**Key**

**F Filtered**  
**UF Unfiltered**

## **Annex E: Screened Data**

## TRC Environmental - Chemical Assessment Record

<b>Contract Engineer</b>	Troy Randall
<b>Project/Site Name</b>	Rookery Farm
<b>Project Number</b>	289128

<b>Sample Reference</b>	WS101	WS101	WS102	WS102	WS103	WS103	WS104	WS104
<b>Depth</b>	0.50 - 0.60	4.70 - 4.90	0.90 - 1.00	3.20 - 3.40	0.10 - 0.20	2.70 - 2.80	3.60 - 3.70	1.20
<b>Date Sampled</b>	26/03/2018	26/03/2018	26/03/2018	26/03/2018	26/03/2018	26/03/2018	26/03/2018	26/03/2018
<b>Time Taken</b>	-	-	-	-	-	-	-	-

Analytical Parameter (Soil Analysis)	Units	S4UL								
Stone Content	%									
Moisture Content	%									

## Speciated PAHs

Naphthalene	mg/kg	2.3	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.19	< 0.1	< 0.1
Acenaphthylene	mg/kg	170	< 0.1	< 0.1	0.38	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
Acenaphthene	mg/kg	210	0.23	< 0.1	0.2	< 0.1	< 0.1	0.89	< 0.1	< 0.1
Fluorene	mg/kg	170	0.19	< 0.1	0.54	< 0.1	< 0.1	0.89	< 0.1	< 0.1
Phenanthrene	mg/kg	95	1.63	< 0.1	5.58	< 0.1	0.29	4.66	< 0.1	0.39
Anthracene	mg/kg	2400	0.51	< 0.1	1.01	< 0.1	< 0.1	1.22	< 0.1	< 0.1
Fluoranthene	mg/kg	280	3.29	< 0.1	4.99	< 0.1	0.75	5.42	< 0.1	0.53
Pyrene	mg/kg	620	2.81	< 0.1	3.91	< 0.1	0.74	4.06	< 0.1	0.4
Benzo(a)anthracene	mg/kg	7.2	1.74	< 0.1	2	< 0.1	0.48	2.35	< 0.1	0.2
Chrysene	mg/kg	15	1.52	< 0.1	1.69	< 0.1	0.43	1.96	< 0.1	0.17
Benzo(b)fluoranthene	mg/kg	2.6	2.12	< 0.1	2.05	< 0.1	0.7	2.49	< 0.1	0.22
Benzo(k)fluoranthene	mg/kg	77	0.71	< 0.1	0.69	< 0.1	0.29	0.84	< 0.1	< 0.1
Benzo(a)pyrene	mg/kg	2.2	1.75	< 0.1	1.69	< 0.1	0.61	1.91	< 0.1	0.16
Indeno(1,2,3-cd)pyrene	mg/kg	27	1.16	< 0.1	1.05	< 0.1	0.39	1.2	< 0.1	0.11
Dibenz(a,h)anthracene	mg/kg	0.24	0.21	< 0.1	0.19	< 0.1	< 0.1	0.23	< 0.1	< 0.1
Benzo(ghi)perylene	mg/kg	320	1	< 0.1	0.84	< 0.1	0.33	0.94	< 0.1	< 0.1

## Total PAH

Speciated Total EPA-16 PAHs	mg/kg		18.9	< 1.6	26.8	< 1.6	5	29.3	< 1.6	2.2
-----------------------------	-------	--	------	-------	------	-------	---	------	-------	-----

## Heavy Metals / Metalloids

[illegible]

Chromium (III)	mg/kg	910	21	22	17	25	16	15	18	15
Copper	mg/kg	2400	36	11	13	10	19	18	10	15
Lead	mg/kg	276	686	318	138	70	110	65	35	53
Elemental Mercury	mg/kg	1.2	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Inorganic Mercury	mg/kg	40								
Methyl Mercury	mg/kg	11								
Nickel	mg/kg	180	11	12	7	15	11	7	9	9
Selenium	mg/kg	250	< 3	< 3	< 3	< 3	< 3	< 3	< 3	< 3
Zinc	mg/kg	3700	104	42	54	39	86	50	39	72

#### Monoaromatics

Benzene	µg/kg	87	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
Toluene	µg/kg	130000	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
Ethylbenzene	µg/kg	47000	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
p & m-xylene	µg/kg	117000	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
o-xylene	µg/kg	60000	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
MTBE (Methyl Tertiary Butyl Ether)	µg/kg	20000	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5

#### Petroleum Hydrocarbons

TPH-CWG - Aliphatic >EC5 - EC6	mg/kg	42	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
TPH-CWG - Aliphatic >EC6 - EC8	mg/kg	100	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05
TPH-CWG - Aliphatic >EC8 - EC10	mg/kg	27	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
TPH-CWG - Aliphatic >EC10 - EC12	mg/kg	130	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
TPH-CWG - Aliphatic >EC12 - EC16	mg/kg	1100	< 3	< 3	< 3	< 3	< 3	< 3	< 3	< 3
TPH-CWG - Aliphatic >EC16 - EC21	mg/kg	65000	14	< 3	< 3	< 3	< 3	< 3	< 3	< 3
TPH-CWG - Aliphatic >EC21 - EC35	mg/kg		14	< 10	32	< 10	< 10	< 10	< 10	44
TPH-CWG - Aliphatic (EC5 - EC35)	mg/kg		28	< 21	32	< 21	< 21	< 21	< 21	44

#### Petroleum Hydrocarbons

TPH-CWG - Aromatic >EC5 - EC7	mg/kg	70	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
TPH-CWG - Aromatic >EC7 - EC8	mg/kg	130	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05
TPH-CWG - Aromatic >EC8 - EC10	mg/kg	34	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
TPH-CWG - Aromatic >EC10 - EC12	mg/kg	74	< 2	< 2	< 2	< 2	< 2	< 2	< 2	< 2
TPH-CWG - Aromatic >EC12 - EC16	mg/kg	140	< 2	< 2	2	< 2	< 2	8	< 2	< 2
TPH-CWG - Aromatic >EC16 - EC21	mg/kg	260	34	< 3	27	< 3	5	29	< 3	6
TPH-CWG - Aromatic >EC21 - EC35	mg/kg	1100	124	< 10	107	< 10	28	93	< 10	< 10
TPH-CWG - Aromatic (EC5 - EC35)	mg/kg		158	< 21	136	< 21	33	130	< 21	< 21



EHS Projects - Chemical Assessment Record									
Contract Engineer					Troy Randall				
Project/Site Name					Rookery Farm				
Project Number					289128				

Sample Reference	WS101	WS102	WS103	WS104					
Depth									
Date Sampled	03/04/2018	03/04/2018	03/04/2018	03/04/2018					
Time Taken									

Determinand	Unit	RL	Screening Criteria	Min	Max							
<b>Heavy Metals / Metalloids</b>												
Arsenic (dissolved)	ug/l	< 5	10	<5	11	< 5	7	11	10			
Boron (dissolved)	ug/l	< 5	1,000	22	500	500	243	121	22			
Cadmium (dissolved)	ug/l	< 0.4	5	<0.4	<0.4	< 0.4	< 0.4	< 0.4	< 0.4			
Chromium (dissolved)	ug/l	< 5	50	<5	19	< 5	< 5	< 5	19			
Chromium (hexavalent)	ug/l	< 20	50	<20	<20	< 20	< 20	< 20	< 20			
Copper (dissolved)	ug/l	< 5	2,000	<5	61	< 5	< 5	< 5	61			
Lead (dissolved)	ug/l	< 5	10	<5	<5	< 5	5	< 5	< 5			
Mercury (dissolved)	ug/l	< 0.05	1	<0.05	<0.05	< 0.05	0.06	< 0.05	< 0.05			
Nickel (dissolved)	ug/l	< 5	20	8	16	13	8	9	16			
Selenium (dissolved)	ug/l	< 5	10	<5	19	5	9	< 5	19			
Zinc (dissolved)	ug/l	< 2	5,000	<2	10	10	< 2	< 2	< 2			

<b>Speciated PAHs</b>												
Naphthalene (aq)	ug/l	< 0.01	0.01	0.05	0.25	0.05	0.22	0.25	0.17			
Acenaphthene (aq)	ug/l	< 0.01	0.01	0.02	0.17	0.02	0.06	0.17	0.07			
Acenaphthylene (aq)	ug/l	< 0.01	0.01	<0.01	0.01	< 0.01	< 0.01	0.01	< 0.01			
Fluoranthene (aq)	ug/l	< 0.01	0.01	0.03	0.05	0.03	0.03	0.04	0.05			
Anthracene (aq)	ug/l	< 0.01	0.01	<0.01	0.03	< 0.01	0.02	0.03	0.03			
Phenanthrene (aq)	ug/l	< 0.01	0.01	<0.01	0.22	< 0.01	0.07	0.22	0.15			
Fluorene (aq)	ug/l	< 0.01	0.01	<0.01	0.14	< 0.01	0.04	0.14	0.04			
Chrysene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Pyrene (aq)	ug/l	< 0.01	0.01	0.02	0.03	0.02	0.02	0.03	0.03			
Benzo(a)anthracene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Benzo(b)fluoranthene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Benzo(k)fluoranthene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Benzo(a)pyrene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Dibenzo(a,h)anthracene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Benzo(g,h,i)perylene (aq)	ug/l	< 0.01	0.01	<0.008	<0.008	< 0.008	< 0.008	< 0.008	< 0.008			
Indeno(1,2,3-cd)pyrene (aq)	ug/l	< 0.01	0.01	<0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01			
Total EPA-16 PAHs	ug/l	< 0.01	0.01	0.12	0.89	0.12	0.46	0.89	0.54			

<b>Petroleum Hydrocarbons</b>												
Aliphatic >C5 - C6	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C6 - C8	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C8 - C10	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C10 - C12	ug/l	< 10	90	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C12 - C16	ug/l	< 10	90	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C16 - C21	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic >C21 - C34	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aliphatic (C5 - C34)	ug/l	< 70	0.1	<70	<70	< 70	< 70	< 70	< 70			

<b>Petroleum Hydrocarbons</b>												
Aromatic >C5 - C7	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C7 - C8	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C8 - C10	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C10 - C12	ug/l	< 10	90	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C12 - C16	ug/l	< 10	90	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C16 - C21	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Aromatic >C21 - C35	ug/l	< 10	0.1	<10	<10	< 10	< 10	< 10	< 10			
Total >C5 - C35	ug/l	< 140		<70	<70	< 70	< 70	< 70	< 70			

<b>Monoaromatics</b>												
Benzene	ug/l	< 1	1	<1	<1	< 1	< 1	< 1	< 1			
Toluene	ug/l	< 5		<5	<5	< 5	< 5	< 5	< 5			
Ethylbenzene	ug/l	< 5		<5	<5	< 5	< 5	< 5	< 5			
p & m-xylene	ug/l	< 10		<10	<10	< 10	< 10	< 10	< 10			
o-xylene	ug/l	< 5		<5	<5	< 5	< 5	< 5	< 5			
MTBE	ug/l	< 10		<10	<10	< 10	< 10	< 10	< 10			

## **Annex F: Laboratory Geotechnical Data**



# LABORATORY REPORT



4043

**Contract Number: PSL18/1486**

Report Date: 10 April 2018  
Client's Reference: 289128  
Client Name: TRC Solutions  
175-185 Grays Inn Road  
London  
WC1X 8UE

**For the attention of: Troy Randall**

Contract Title: Rookery Farm  
Date Received: 29/3/2018  
Date Commenced: 29/3/2018  
Date Completed: 10/4/2018

**Notes: Opinions and Interpretations are outside the UKAS Accreditation**

A copy of the Laboratory Schedule of accredited tests as issued by UKAS is attached to this report. This certificate is issued in accordance with the accreditation requirements of the United Kingdom Accreditation Service. The results reported herein relate only to the material supplied to the laboratory. This certificate shall not be reproduced other than in full, without the prior written approval of the laboratory.

Checked and Approved Signatories:

R Gunson  
(Director)

A Watkins  
(Director)

R Berriman  
(Quality Manager)



L Knight  
(Senior Technician)

S Eyre  
(Senior Technician)

A Fry  
(Senior Technician)

5 – 7 Hexthorpe Road, Hexthorpe,  
Doncaster DN4 0AR  
tel: +44 (0)844 815 6641  
fax: +44 (0)844 815 6642

Page 1 of



## SUMMARY OF LABORATORY SOIL DESCRIPTIONS

[illegible]

**PSL**  
Professional Soils Laboratory

## Rookery Farm

**Contract No:**

PSL18/1486

**Client Ref:**

289128

## SUMMARY OF SOIL CLASSIFICATION TESTS

**(BS1377 : PART 2 : 1990)**

[illegible]

**SYMBOLS : NP : Non Plastic**

**\* : Liquid Limit and Plastic Limit Wet Sieved.**



4043

**PSL**  
Professional Soils Laboratory

## Rookery Farm

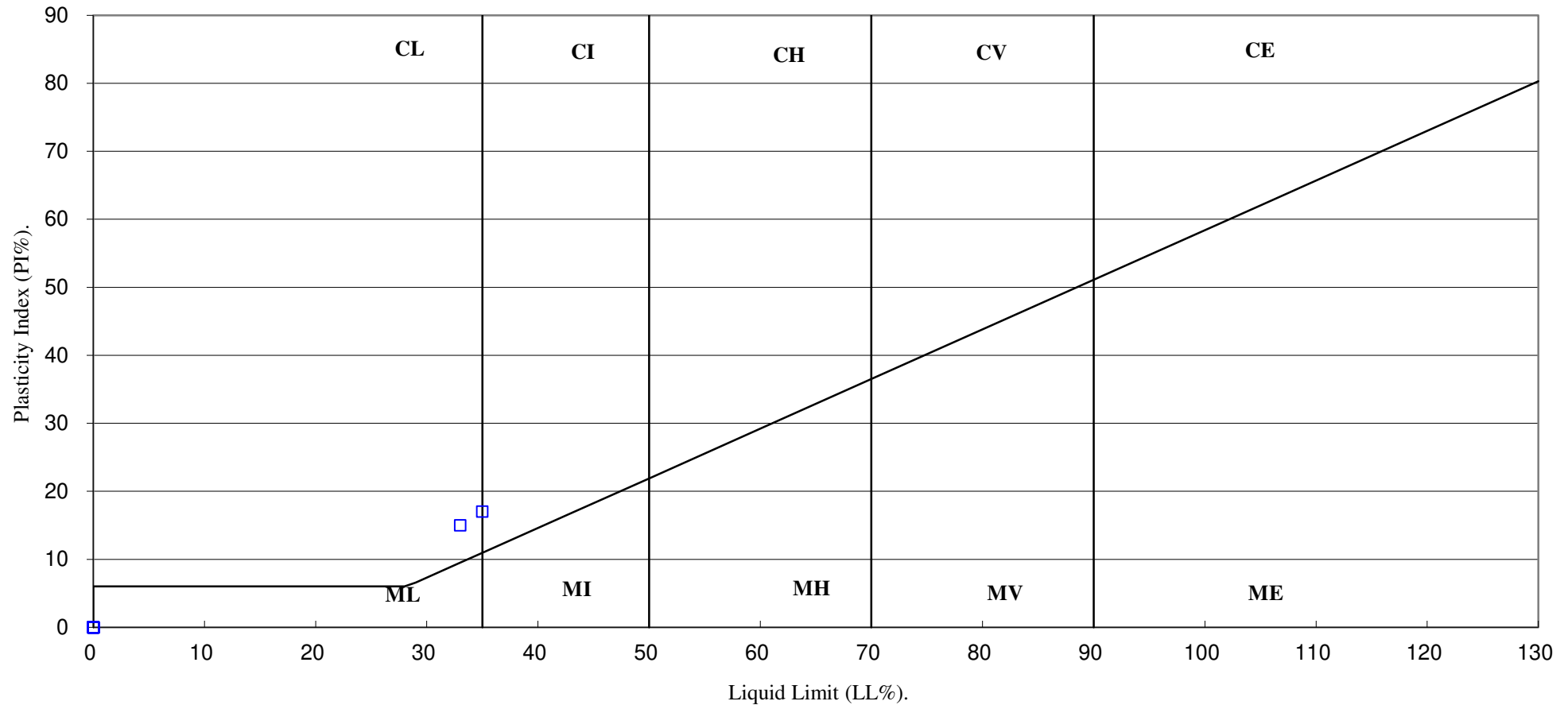
**Contract No:**

PSL18/1486

**Client Ref:**

**289128**

# PLASTICITY CHART FOR CASAGRANDE CLASSIFICATION.



4043

**PSL**  
Professional Soils Laboratory

Rookery Farm

Contract No:

PSL18/1486

Client Ref:

289128



# PARTICLE SIZE DISTRIBUTION TEST

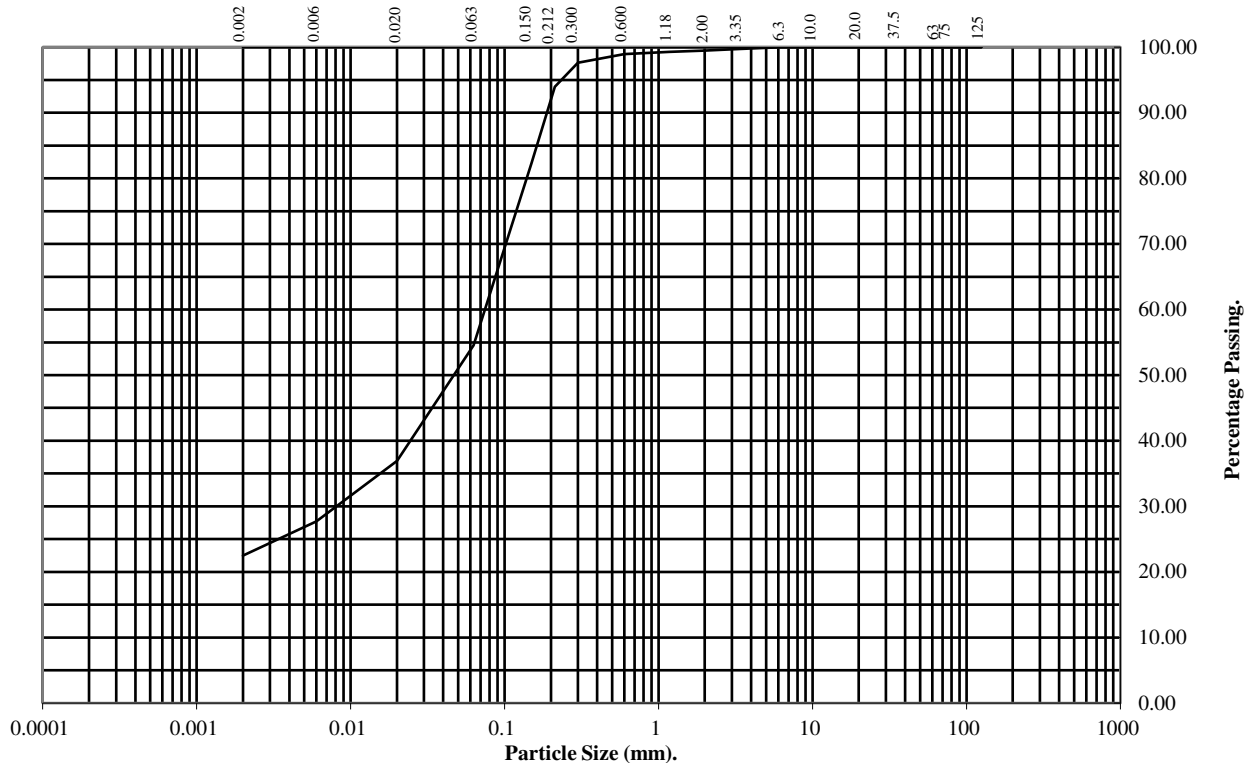
BS1377 : Part 2 : 1990

Wet Sieve & Pipette Analysis, Clause 9.2 & 9.4

Hole Number: WS101 Top Depth (m): 4.70

Sample Number: Base Depth(m): 4.90

Sample Type: D



BS Test Sieve (mm)	Percentage Passing
125	100
75	100
63	100
37.5	100
20	100
10	100
6.3	100
3.35	100
2	99
1.18	99
0.6	99
0.3	98
0.212	94
0.15	82
0.063	55

Particle Diameter	Percentage Passing
0.02	37
0.006	28
0.002	22

Soil Fraction	Total Percentage
Cobbles	0
Gravel	1
Sand	44
Silt	33
Clay	22

**Remarks:**  
See Summary of Soil Descriptions



Rookery Farm

Contract No:  
PSL18/1486  
Client Ref:  
289128

# PARTICLE SIZE DISTRIBUTION TEST

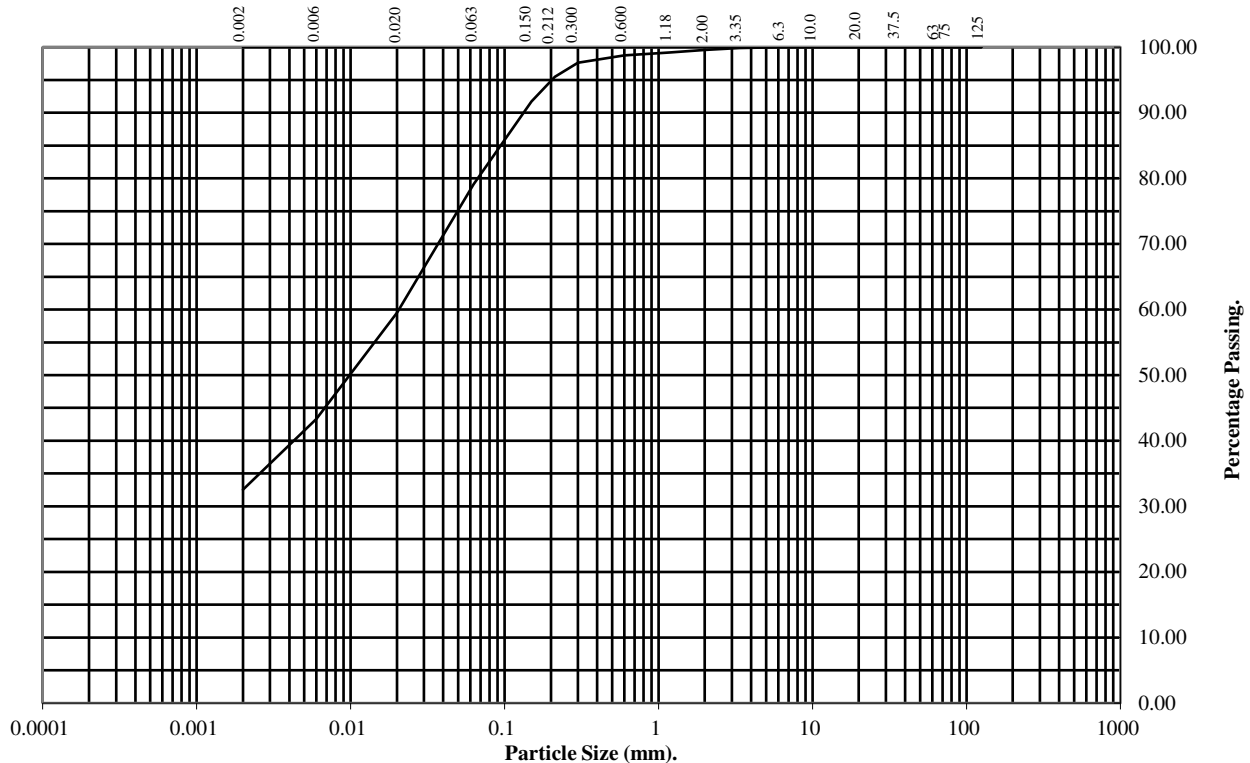
BS1377 : Part 2 : 1990

Wet Sieve & Pipette Analysis, Clause 9.2 & 9.4

Hole Number: **WS102** Top Depth (m): **3.20**

Sample Number: Base Depth(m): **3.40**

Sample Type: **D**

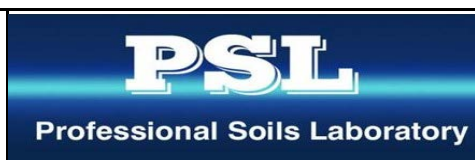


BS Test Sieve (mm)	Percentage Passing
125	100
75	100
63	100
37.5	100
20	100
10	100
6.3	100
3.35	100
2	100
1.18	99
0.6	99
0.3	98
0.212	95
0.15	92
0.063	79

Particle Diameter	Percentage Passing
0.02	60
0.006	43
0.002	33

Soil Fraction	Total Percentage
Cobbles	0
Gravel	0
Sand	21
Silt	46
Clay	33

**Remarks:**  
See Summary of Soil Descriptions



Rookery Farm

<b>Contract No:</b>
<b>PSL18/1486</b>
<b>Client Ref:</b>
<b>289128</b>



## Certificate of Analysis

*Certificate Number* 18-07878

11-Apr-18

*Client* Professional Soils Laboratory Ltd  
5/7 Hexthorpe Road  
Hexthorpe  
DN4 0AR

*Our Reference* 18-07878

*Client Reference* PSL18/1486

*Order No* (not supplied)

*Contract Title* Rookery Farm (289128)

*Description* 7 Soil samples.

*Date Received* 05-Apr-18

*Date Started* 05-Apr-18

*Date Completed* 11-Apr-18

*Test Procedures* Identified by prefix DETSn (details on request).

*Notes* Opinions and interpretations are outside the laboratory's scope of ISO 17025 accreditation. This certificate is issued in accordance with the accreditation requirements of the United Kingdom Accreditation Service. The results reported herein relate only to the material supplied to the laboratory. This certificate shall not be reproduced except in full, without the prior written approval of the laboratory.

*Approved By*



Adam Fenwick  
Contracts Manager



## Summary of Chemical Analysis

### Soil Samples

Our Ref 18-07878

Client Ref PSL18/1486

Contract Title Rookery Farm (289128)

Lab No	1320426	1320427	1320428	1320429	1320430	1320431	1320432
Sample ID	WS101	WS101	WS102	WS102	WS103	WS103	WS104
Depth	0.50-0.60	4.70-4.90	0.30-0.40	3.20-3.40	0.10-0.20	3.60-3.70	0.10-0.20
Other ID							
Sample Type	D	D	D	D	D	D	D
Sampling Date	n/s	n/s	n/s	n/s	n/s	n/s	n/s
Sampling Time	n/s	n/s	n/s	n/s	n/s	n/s	n/s

Test	Method	LOD	Units							
<b>Metals</b>										
Magnesium Aqueous Extract	DETSC 2076*	10	mg/l	< 10	13	< 10	< 10	< 10	< 10	< 10
<b>Inorganics</b>										
pH	DETSC 2008#			9.8	7.7	10.5	7.9	11.4	7.7	9.5
Chloride Aqueous Extract	DETSC 2055	1	mg/l	20	25	9.0	16	80	9.8	16
Nitrate Aqueous Extract as NO3	DETSC 2055	1	mg/l	5.9	< 1.0	2.4	1.0	< 1.0	< 1.0	4.5
Sulphate Aqueous Extract as SO4	DETSC 2076#	10	mg/l	370	210	370	180	200	51	250
Sulphur as S, Total	DETSC 2320	0.01	%	0.08	0.04	0.08	0.02	0.12	0.02	0.05
Sulphate as SO4, Total	DETSC 2321#	0.01	%	0.18	0.05	0.18	0.03	0.27	0.03	0.09

## Information in Support of the Analytical Results

Our Ref 18-07878  
 Client Ref PSL18/1486  
 Contract Rookery Farm (289128)

### Containers Received & Deviating Samples

Lab No	Sample ID	Date Sampled	Containers Received	Holding time exceeded for tests	Inappropriate container for tests
1320426	WS101 0.50-0.60 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320427	WS101 4.70-4.90 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320428	WS102 0.30-0.40 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320429	WS102 3.20-3.40 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320430	WS103 0.10-0.20 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320431	WS103 3.60-3.70 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	
1320432	WS104 0.10-0.20 SOIL		PT 1L	Sample date not supplied, Anions 2:1 (365 days), Total Sulphur ICP (365 days), Total Sulphate ICP (730 days), Metals ICP Prep (365 days), pH + Conductivity (7 days)	

Key: P-Plastic T-Tub

DETS cannot be held responsible for the integrity of samples received whereby the laboratory did not undertake the sampling. In this instance samples received may be deviating. Deviating Sample criteria are based on British and International standards and laboratory trials in conjunction with the UKAS note 'Guidance on Deviating Samples'. All samples received are listed above. However, those samples that have additional comments in relation to hold time, inappropriate containers etc are deviating due to the reasons stated. This means that the analysis is accredited where applicable, but results may be compromised due to sample deviations. If no sampled date (soils) or date+time (waters) has been supplied then samples are deviating. However, if you are able to supply a sampled date (and time for waters) this will prevent samples being reported as deviating where specific hold times are not exceeded and where the container supplied is suitable.

### Soil Analysis Notes

Inorganic soil analysis was carried out on a dried sample, crushed to pass a 425µm sieve, in accordance with BS1377.

Organic soil analysis was carried out on an 'as received' sample. Organics results are corrected for moisture and expressed on a dry weight basis.

The Loss on Drying, used to express organics analysis on an air dried basis, is carried out at a temperature of 28°C +/-2°C.

### Disposal

From the issue date of this test certificate, samples will be held for the following times prior to disposal :-

Soils - 1 month, Liquids - 2 weeks, Asbestos (test portion) - 6 months

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 18 December 2020 15:53  
**To:** Planning Policy  
**Subject:** Frosbisher Developments Ltd (on behalf of Southern Planning Practice LTD)  
Response  
**Attachments:** E1.pdf; E2.pdf; E3.pdf; E4.pdf; Omission Site.pdf; Paragraphs.pdf; Policies Map.pdf;  
Reps Final 181220 with Appendices.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Lynne [REDACTED]  
**Sent:** 18 December 2020 14:43  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Cc:** [REDACTED]  
**Subject:** Representations to the Fareham Draft Plan - on behalf of Frosbisher Developments Ltd

Please find enclosed reps to the above Plan on behalf of Frosbisher Developments Ltd.

The submission includes the completed reps forms together with a statement of representations including Appendices.

Please acknowledge receipt.

If you have any queries please contact Andy Partridge or Lynne Evans of this office.

Lynne Evans  
Lynne Evans BA MA MRTPI MRICS  
Consultant

Southern Planning Practice Ltd  
Registered Office: Youngs Yard, Churchfields, Twyford, Winchester, Hampshire, SO21 1NN Registered in England and Wales No. 3862030  
[REDACTED]

[www.southernplanning.co.uk](http://www.southernplanning.co.uk)

This email and any files transmitted with it are confidential, may be legally privileged and are for the sole use of the intended recipient. Copyright of this email and any accompanying document created by us is owned by Southern Planning Practice Ltd. If you are not the intended recipient you should not use or disclose to any other person the contents of this email or its attachments (if any), nor take copies. If you have received this email in error, please notify the sender immediately and then delete it from your system. Southern Planning Practice Ltd has taken every reasonable precaution to ensure that any attachment to this email has been swept for viruses, but Southern Planning Practice Ltd accepts no liability for any loss or damage which may be caused by software viruses.





# 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)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE ✓

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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).

6.1 - 6.26 INCLUDING TABLES

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 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?

PLEASE SEE ATTACHED REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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:

First Name:

Last Name:

Job Title: (where relevant)

Organisation: (where relevant)

FROBISHER DEVELOPMENTS LIMITED

Address:

C/O SOUTHERN PLANNING PRACTICE LIMITED

Postcode:

Telephone Number:

Email Address:

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

Title:

MR

First Name:

ANDREW

Last Name:

PARTRIDGE

Job Title: (where relevant)

DIRECTOR

Organisation: (where relevant)

SOUTHERN PLANNING PRACTICE LIMITED

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 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 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 REPRESENTATIONS

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

PLEASE SEE ATTACHED REPRESENTATIONS

B4c Your suggested revised wording of any policy or text:

PLEASE SEE ATTACHED 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):

THE OBJECTIONS RAISE COMPLEX AND SIGNIFICANT ISSUES WHICH AFFECT THE SOUNDNESS OF THE PLAN, AND REQUIRE TO BE FULLY DEBATED AT THE EXAMINATION TO INFORM THE INSPECTOR

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



**REPRESENTATIONS TO THE  
DRAFT FAREHAM LOCAL PLAN 2037**

**On behalf of**

**Frobisher Developments Limited**

**Mr A C Partridge,  
BSc (Hons) DIP UP, MTRPI**



**Client: Frobisher Developments Limited**

**Date: December 2020**

**Ref:**

<b>1.0 INTRODUCTION.....</b>	<b>3</b>
<b>2.0 OBJECTION TO STRATEGIC POLICY E1 – EMPLOYMENT LAND PROVISION – POLICY BACKGROUND.....</b>	<b>5</b>
<b>Overview : National and Local Planning Objectives.....</b>	<b>5</b>
<b>3.0 OBJECTION TO STRATEGIC POLICY E1 – EMPLOYMENT LAND PROVISION – FLOORSPACE CONSIDERATIONS .....</b>	<b>8</b>
<b>4.0 OBJECTION TO STRATEGIC POLICY E1 – EMPLOYMENT LAND PROVISION – CRITIQUE OF OTHER SITES, INCLUDING LAND AT WELBORNE .....</b>	<b>11</b>
<b>5.0 OBJECTION TO STRATEGIC POLICY E1 – EMPLOYMENT LAND PROVISION – OTHER ISSUES ARISING.....</b>	<b>15</b>
<b>6.0 REINSTATEMENT OF EMPLOYMENT ALLOCATION IN ADOPTED PLAN - LITTLE PARK FARM.....</b>	<b>18</b>

**APPENDICES****A) SITE PLAN****B) COPY OF JUDICIAL REVIEW PRE-ACTION PROTOCOL LETTER (04/12/20)****C) EMPLOYMENT LAND REPORT – PROPERNOMICS LTD INCLUDING LETTER  
AND APPENDICES FROM VAIL WILLIAMS****D) ECOLOGY REPORT – EPDM LTD****E) ACCESSIBILITY ISSUES – RAILTON LTD****F) FROBISHER DEVELOPMENTS LTD BRIEFING NOTE****G) NETWORK RAIL APPROVAL****H) RAILTON REPORT & PLAN OF BRIDGE WORKS**

## **1.0 INTRODUCTION**

- 1.1 Southern Planning Practice Ltd is instructed by Frobisher Developments Limited (FDL) to submit representations to the Regulation 19 version of the Fareham Local Plan 2037. FDL own development land at Little Park Farm, Segensworth, which is currently allocated under the adopted Local Plan Part 2 for up to 11,200 sqm of employment (B2/B8) floorspace. However, the site is now proposed to be de-allocated and the site revert to countryside, with the exception of small parcels of land in employment/other uses. A site plan is included at Appendix A.
- 1.2 The Plan as drafted is assessed to be UNSOUND; these representations set out the reasons why the Plan is considered to be UNSOUND and sets out the steps that require to be taken to make the Plan sound.
- 1.3 Separate representation forms have been submitted against each policy and paragraph, relating back to the submitted evidence base, which is considered to be UNSOUND, but the case to be made is set out in full in this document. In summary, OBJECTION is raised to Strategic Policy E1 – Employment Land Provision as well as Policies E2; E3 and E4 in terms of the proposed employment allocations at Faraday Business Park, Swordfish Business Park and Solent 2. Finally, the case is made as to why the existing employment allocation of Little Park Farm in the current development plan (Local Plan Part 2) should be re-instated.
- 1.4 Section 2 sets out the policy background and the importance that national policy provides for employment growth and how this is also a key objective at the local level. Sections 3, 4 and 5 analyse and set out the case for why the Strategic Policy E1 is unsound and will not meet the stated Council and national economic objectives; the issues over the floorspace figures, the limited sites allocated for further employment growth under Policies E2, E3 and E4 as well as other factors which need to be taken into account in determining the sound approach to employment provision. Section 6 makes the case for why Little Park Farm should be reallocated and continue to follow through as an allocation from the current adopted development plan. The reallocation of Little Park Farm will assist in providing a more achievable and flexible supply of employment land. Section 7 sets out the modifications that require to be made in respect of the issues raised in order to assist in making the Plan SOUND.

- 1.5 It should be noted that as a separate action, a Judicial Review Pre-Action Protocol Letter dated 4 December has been submitted to Fareham Borough Council in support of an application for permission to apply for judicial review to quash the Council's decision to omit the Little Park Farm site from the Regulation 19 draft of the Fareham Local Plan. A copy of that letter which sets out the case to be made is attached at Appendix B to this statement.
- 1.6 A number of separate reports have been prepared to support these representations and included as appendices as indicated on the Contents Page. They will be referenced as appropriate throughout the report.

## 2.0 **OBJECTION to Strategic Policy E1 – Employment Land Provision – Policy Background**

### **Overview : National and Local Planning Objectives**

#### **National**

- 2.1 Before analysing the approach adopted by Fareham, it is first worth reviewing the clear guidance on the approach to be followed as set out under the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) .
- 2.2 The NPPF is clear that sustainable development, the very purpose of the planning system, has three interrelated objectives including an economic objective, which is, as stated at paragraph 8a) – *‘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; and by identifying and coordinating the provision of infrastructure;’*
- 2.3 Paragraph 11 makes clear that in plan making, and subject to a closed set of exceptions, *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.*
- 2.4 Section 6 of the NPPF is entitled Building a strong, competitive economy and sets out a clear requirement at paragraph 80 for planning policies to *help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*
- 2.5 The PPG Under the Section entitled Supporting More Effective Use of Land sets out a number of factors to determine whether there is a realistic prospect of an allocated site being developed for its intended use. These matters are addressed in respect of Little Park Farm in Section 6.

- 2.6 Under Housing and Economic Needs Assessments, the PPG refers to the importance of a robust evidence base to understand existing business needs which will need to be kept under review to reflect local circumstances and market conditions.

## Local

- 2.7 In 2017 the Council produced its Corporate Strategy 2017 – 2023 entitled: ***Fareham a prosperous and attractive place to be***, which is then reviewed annually, the most recent being in November 2020. The Corporate Strategy includes that Fareham *is a thriving place for business* drawing attention to its well educated workforce and low levels of employment. The Corporate Strategy draws particular attention to the future employment opportunities at Daedalus and Welborne. Under its Fourth Priority to Maintain and Extend Prosperity, the Council makes the statement that *We recognise that business growth is essential to the local economy, providing good quality jobs for local people and creating attractive, vibrant town and district centres*. It sets out that as well as supporting and protecting existing businesses it seeks to attract new employers to the Borough.

- 2.8 The Local Plan is intended to set out the policies that will determine future land use to meet the needs of the corporate strategy. In its draft Local Plan, Fareham appears to acknowledge the high priority to be given to economic objectives in its Plan and its Vision at 2.10 includes:

*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 its associated jobs.*

- 2.9 Fareham's first strategic priority at 2.12 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.*

And at 6:

*Provide a mix of jobs and employment opportunities through protecting and further enhancing viable and important employment areas and zones, and providing for the future employment floorspace*



- 2.10 The opening paragraphs to the Employment Chapter also include very positive statements about not only supporting existing employment to be retained and to grow but also *in encouraging the formation of new businesses, an important element of the sustainable economic development of the Borough is to attract new investment, both in the form of new businesses moving in and the investment in infrastructure such as superfast broadband and skills training* (paragraph 6.3)
- 2.11 A cursory read through of the draft Plan might take reassurance that the Council is properly committed to ensuring economic growth across the Borough and indeed acknowledging and responding to its role within the Solent Local Economic Partnership (Solent LEP) and the Partnership for South Hampshire (PfSH). Indeed, Table 6.4 showing the Employment Floorspace Position suggests a generous over provision of employment floorspace provision.
- 2.12 However, the Council is relying on a very small number of sites to deliver this growth and there are serious concerns that these sites face a number of issues which may restrict the contribution that they can make and the timescales within which the new employment floorspace and opportunities will be brought forward. This is not to suggest that these sites should be deleted from the Plan, rather that a more realistic analysis needs to be undertaken of capacity and timing.
- 2.13 Once this exercise has been undertaken, it will be evident that further employment land needs to be allocated in the Plan, including the re-instatement of Little Park Farm as an employment site for some 11,200 sq m of B2/B8 uses.

### **3.0 OBJECTION to Strategic Policy E1 – Employment Land Provision – Floorspace Considerations**

3.1. This section seeks only to summarise the key points arising from the more in depth study provided by Propernomics of the employment land position in Fareham and it is requested that full regard is had to that report (Appendix C). Although it would appear that the Council is over providing in terms of its employment floorspace, the ability for the Council to meet its stated objectives in terms of safeguarding and bettering the economy, enabling the Borough to prosper need to be questioned for the following reasons. The order of the issues should not be regarded as any prioritising of the issues, all of which are significant and contribute to the overall concern.

#### **i) Diminishing Lack of Supply and Choice of Employment Land and Buildings in the Market**

3.2. The letter from Vail Williams, leading agents in the employment sector, with particular expertise in the industrial and warehouse sector on the Solent Corridor (attached to Propernomics report at Appendix C ) sets out clearly the lack of available supply of sites in the market to meet market demand, as well as the lag time in being able to meet demand. The issue is both one of availability in absolute terms and, as a consequence, a lack of choice to meet differing market requirements. This indicates that rather than artificially reducing the potential supply of employment sites and floorspace, and relying on a very small number, some with long lead in times, the Council should be providing a much greater range of sites, with an emphasis on those that appear to be capable of delivering in the earlier years of the Plan period.

#### **ii) Duty to Co-Operate**

3.3. It is not for these representations to comment on whether and how the Council has undertaken its Duty to Co-Operate in respect of its housing provision, but there appears to have been a lack of proper regard in undertaking its Duty to Co-Operate in respect of employment issues, with the wider sub-region, despite being a member of the partnership for South Hampshire (PfSH). It is noted that the Council relies on a 2016 PfSH Spatial Position Statement setting out the overall need and distribution of development in South Hampshire to 2034. However, the Council acknowledges that the report is out of date and needs replacing but indicates that the revised report will not be available until into 2021. Whilst it is acknowledged that there is always an issue in ensuring that the preparation of

plans and evidence are synchronised, it is surprising that Fareham proceeded with its Reg 19 Plan on what it acknowledged to be out of date evidence.

- 3.4. One particular issue where the current Plan is lacking is detail on employment forecast which PfSH has commissioned and could therefore be very informative for progressing the Plan and the delivery of its employment and wider economic objectives.

**iii) Recognition of Differences across the Borough in terms of Employment Sub Areas**

- 3.5. Whilst it is appreciated that the Council must set out its floorspace figures across the whole district, a proper analysis of the different sub regions and their separate needs and demands needs to form the proper basis of this analysis. A seeming over supply of sites and floorspace across the district may still lead to a lack of supply, flexibility and choice in some key areas. This again points to the shortcomings of relying on such a small number of allocations to meet all the many different requirements and timescales over the Plan period. A focus on such a small number of sites inevitably builds in inflexibility in the supply chain, risking the opportunity to provide the floorspace and jobs required to maintain and build economic prosperity.

**iv) Self Containment Issues**

- 3.6. Fareham is supporting the concept of greater self containment, and this is a key principle of the Welborne development, whereby the local residential population will support the local employment provision. Whether or not this concept is fully achievable is beyond the scope of these representations, it does suggest the need for a greater employment provision to meet wider demand.

**v) Flexibility**

- 3.7. Whilst the Plan suggests that the employment provision being made is addressing a requirement to be flexible to meet changing requirements over the Plan period, this must be questioned through the Council's actions in its specific policies of focusing its allocations to such a small number of sites and deallocating sites, such as Little Park Farm, that are suitable and achievable. The need for a wide range of sites capable of meeting a range of employment needs cannot be over- emphasised. If the Council were wholly committed to its

objectives of economic prosperity, it would not be deallocating sites, but looking to extend all potential opportunities.

### **Conclusion from Section**

- 3.7. The provision of the appropriate level of employment floorspace is a particular complex issue to tackle but this section indicates that the position is potentially more complex than planned for with the need to ensure a much greater choice of sites to ensure greater flexibility to meet market demand and so achieve objective of economic prosperity. The next Section builds on this concern by considering the very limited number of sites that have been brought forward to meet the employments needs and demands of the Borough and Sub -region.

#### **4.0 OBJECTION to Strategic Policy E1 – Employment Land Provision – Critique of Other Sites, including Land at Welborne**

- 4.1 Strategic Policy E1 allocates only three sites to achieve its new employment space; in addition the Plan relies heavily on the allocations already made at Welborne under The Welborne Plan (2015) and over and above these four sites which are intended to meet the new supply identified, extensions and intensifications of existing employment sites.
- 4.2 However, the strategy of relying on these large sites only to provide the much needed employment growth must be questioned. This section looks briefly at the three allocations in the draft Plan, together with Welborne. In reviewing these sites, reference has been made to the supporting reports on highway, ecology and employment land issues appended to these representations.

#### **Policy E4 - Solent 2**

##### **Proposed Use: Employment with a Capacity of 23,500sqm**

- 4.3 Solent 2 is a long standing employment allocation, with the original permission dating back to 1991. The Council refers to an extant outline planning permission and Table 6.3 of the draft Local Plan provides for 11,800 sqm offices; 5,850 sqm of general industrial and 5,850 sqm of storage/distribution. However, notwithstanding the long term allocation and the existence of outline planning permission, the development continues to fail to be delivered. The reserved matters approval granted in 2006 under the reference: P/06/0831/RM has long since expired. Although the Local Plan refers to an extant outline planning permission for the site, it must be questioned, from a review of the planning history online records whether any works have been undertaken and whether the outline permission could now actually be implemented. Furthermore, given how long has passed since these permissions were granted, it would be most unlikely that they would suit current market requirements.
- 4.4 The representations are supported by a number of reports reviewing the issues relating to the delivery of Solent 2, including a Briefing Note<sup>1</sup> from Frobisher Developments Limited supported by technical analyses by Railton TPC Ltd, Propernomics and EDPM at Appendices C,D E and F.

---

<sup>1</sup> The note was written prior to the investigation into the planning history revealing the expiry of the reserved matters.

- 4.5 Key issues relating to the delivery of this site relate to its access off Rookery Avenue, which already, as existing, suffers considerable congestion in the rush hour period. The Plan is silent on how the traffic generated by the employment allocation would affect the amenities of the nearby residential areas, as well as the safety and amenity issues arising from the nearby Whiteley primary school.
- 4.5 There are a number of key ecological issues and associated costs which are seen as challenging, exacerbated by the existence and location of ancient woodland affecting the form and ease of delivering the development. As a result of these issues and the water main crossing the site, the capacity of the site may have been over estimated and may, in practice, be little more than 50% of that shown – see Briefing Note and Plan.
- 4.6 The Lambert Smith Hampton report undertaken for the Council recognises that the site has been marketed for a long period, but considers it to have unfulfilled potential. Because of recognised congestion constraints, the report concludes that the site would be less suitable for B8 uses with a particular preference for B2 uses.
- 4.7 It would appear that the opportunity to bring forward employment development on this site have existed for many years but it has not happened. The constraints are potentially increasing in terms of access and congestion and the ecological constraints. A question mark remains over the likelihood of this site coming forward, its capacity and market interest.

**Policy E2: Faraday Business Park (Daedalus East)**

**Proposed Use: Employment with ancillary uses with a capacity of 65,100 sq m (in addition to 28,000sqm consented)**  
**and**

**Policy E4: Swordfish Business Park (Daedalus West)**

**Proposed Use: Employment with ancillary uses with a capacity of 12,100 sq m (in addition to 22,000sqm consented or retained)**

- 4.8 These sites (under both E2 and E4) are heavily invested in by the Council and Solent LEP. It is not suggested that they do not and will not have a role to play in the area's overall employment provision. However, and even with the completion of the Stubbington bypass the view of commercial agents, Vail Williams and others is that the distance of the site from the motorway and journey times will be unacceptable to those companies reliant on many traffic movements per day. These two sites are therefore likely to serve a more local market



than sites much closer to the motorway. In short, these sites are serving a difference purpose and sub market to sites closer to and with easy access to the motorway.

#### **Welborne – The Welborne Plan 2015**

**Proposed Capacity of Employment Elements: 15,000sqm offices, 17,000sqm general industrial and 20,000sqm storage/distribution.**

- 4.9 Although allocated under the Welborne Plan 2015 and not being revisited as part of the Local Plan, the Council is relying on a large proportion of its employment floorspace to be delivered at Welborne. However, there are very real issues faced with the delivery of the much needed infrastructure to secure the improvements to junction 10 of the M27 to allow access and egress to the employment areas.
- 4.10 Following a resolution to grant outline planning permission in October 2019, the Section 106 agreement has still not been signed and therefore planning permission has not yet been issued. According to the online planning application register , a decision is due by 8th January 2021. However the site cannot be developed until funding is secured for Junction 10 of the M27.
- 4.11 On 14 January 2020, Hampshire County Council published an Executive Decision Record on the M27 Junction 10. It confirmed that since Scheme development work and the progression of work on the Full Business Case is at an impasse, pending the confirmation of full funding for delivery and of a delivery body. HCC were supportive and stated that they would work with Fareham Borough Council to secure Government funding for Welbourne to ensure that the Junction 10 Scheme can be fully funded and delivered.
- 4.12 As recently as November 2020, the Annual Review of the Corporate Strategy by the Deputy Chief Executive Officer noted that
- *Good progress is being made on negotiating the Welborne Section 106 development agreement with the applicant and Hampshire County Council, so that planning permission can be granted. However, the capital funding gap for the necessary improvements to M27 junction 10 remains and is a key risk to the delivery of the new community. Work continues with the developer and local and national funding partners to address it.*
- 4.13 A serious delay with the provision of the infrastructure will in turn have an impact on market confidence and the rate at which the development will start to come forward, including employment space. Even the Lambert Smith Hampton report undertaken for the Council as part of the evidence base for the Plan acknowledged that *this prime opportunity has*

*remained dormant over many years and has therefore been disregarded by potential occupiers or prospective developers. This is principally due to the fact the site has compromised motorway access and infrastructure limitations which require significant public sector investment to upgrade Junction 10 to kickstart and implement development activity. So understandably, Welborne has acquired a market perception of having tremendous potential but when will it have the certain prospect of delivery within a commercial timescale?*

### **Conclusion to Section**

- 4.14 As indicated earlier, these representations are not suggesting that these allocations should be rejected, but there must be a real concern that they can soundly deliver the much needed employment space that the Council is seeking as part of its strategic vision, including in the timescales required and to provide the flexibility required to meet the differing and changing requirements of the commercial market.

## **5.0 OBJECTION to Strategic Policy E1 – Employment Land Provision – Other Issues Arising**

- 5.1 A significant part of the Employment Evidence Base relies on a report entitled A Business Needs, Site Assessments and Employment Land Study by Lambert Smith Hampton (January 2019 with Addendum August 2019) for Fareham Borough Council. It concludes:

*In our opinion it is far preferable to have a surplus of employment land in the Local Plan, wherever possible, in order to enhance the choice and variation to developers and occupiers (arguably supply creates and attracts demand) however all the sites recognised must be viable and have a realistic prospect of development within a reliable delivery period.*

- 5.2 It is contended that there are a number of additional reasons why a surplus of sites is necessary if Fareham is going to secure its economic objectives, some of which may not have been identified at the time of the above report and reflect the rapidly changing economic times which need to be taken into account in moving forward. A small number of these various issues are considered briefly below:

### **Response to Changes to the Use Classes Order**

- 5.3 At a very advanced stage in the signing off of the Regulation 19 draft Plan, the Uses Classes Order was amended to amalgamate a number of the former use classes into a new class E. This new Class E includes all commercial, business and services uses including shops, financial and professional services, cafes, offices, research and development, industrial, clinics and health centres, day centres and gyms. This is identified at paragraph 6.9 of the Plan which states that *This amendment to the use class order means that employment uses for 'B class' uses is no longer appropriate, and likewise the use of E class would allow for uses not wholly suitable for their locations. As such, the policies in this Plan will categorise land for; Office, General Industrial and Warehouse and Distribution type uses.*
- 5.4 However, the full implications of this new class and the effect on the demand and supply for accommodation cannot yet be known and will not be fully known for some time to come. This is another reason why at this point in time, it is important to ensure that there is a plentiful supply of employment land to ensure that unforeseen and potentially unexpected consequences of the changes in the Use Classes Order does not frustrate the delivery of jobs and employment opportunities.

## Effects of the Covid 19 Pandemic

- 5.5 It is potentially too early to model the potential changes to employment habits and demands and whether the trends seen over the last 9 months might continue or be reversed with the introduction of a vaccine and eventual control over the pandemic. Potentially the effects of the pandemic taken together with other structural economic changes hastened as a result of the pandemic may see a decline in the demand for large offices but potentially a greater demand for logistical operations, including in the retail sector, to ensure rapid response to changing situations. This again indicates the need for a generous provision particularly of storage and distribution space with good access to the strategic highway network.
- 5.6 The PPG is clear that *The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)*. Furthermore the need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the need of SMEs and 'last mile' facilities serving local markets is emphasised.

Paragraph: 031 Reference ID: 2a-031-20190722

Revision date: 22 07 2019

- 5.7 Whilst the Council's supporting employment report from Lambert Smith Hampton does address the logistics sector, this sector appears to receive scant consideration in the actual draft Plan.

## Leaving the EU/Brexit

- 5.8 In a similar way to the implications arising from the current pandemic it is premature to suggest that there is a full understanding of the likely effects of Brexit – with or without trade deals in place – on the employment market and the demand and supply of employment and distribution space. However, the need to ensure a generous supply of readily available employment space is critical to ensure that locally and nationally the economy is best placed to face the challenges and opportunities ahead.

### **Conclusion from this Section.**

- 5.9 These three issues alone indicate that to maximise the prospects of a secure and vibrant economic future which is the Council's objective, a very generous supply of employment space is required.

## **6.0 Reinstatement of Employment Allocation in adopted Plan - Little Park Farm**

- 6.1 The allocated employment site under the adopted Local Plan Part 2 is located to the south of Junction 9 of the M27 and to the west of the A27. Immediately to the south of the site lies the railway line running from Fareham to Swanwick, beyond this is Segensworth West Industrial Estate which comprises a range of business and employment uses. To the west of the site lies an area of grassland currently used as paddocks for grazing horses accessed off Little Park Farm Road. Further to the west there is a minibus storage facility and Kennels. To the east of the site beyond the A27 is a large area of industrial and employment uses comprising Segensworth East Industrial Estate.
- 6.2 The site is accessed from the Dewar Close/Little Park Farm Road roundabout, on Segensworth West Industrial Estate and the site entrance is via a section of Little Park Farm Road owned privately by HCC Estate Department and then through a restricted height Victorian railway arch bridge (referred to as Hayling Farm Bridge E15/37) owned by Network Rail.
- 6.3 Under the adopted Local Plan Part 2 (2015), Policy DS18: Employment Allocations allocated five sites for employment uses including Little Park Farm. The employment allocation is proposed to be for 11,200 sq m of B2/B8 warehousing. The reasoned justification for the policy identified that there may be a need to improve the existing access under the railway line (para 5.25). Little Park Farm was also included within the urban area boundary. At this point in time, therefore Little Park Farm is an allocated employment site.
- 6.4 An application is currently at the very final stages of preparation and due for submission in early January 2021 to modify the existing access to the allocated employment site. The main element of the proposals is the alterations to the bridge (referred to as Hayling Farm Bridge E15/37). It is proposed to excavate under the bridge to give a height clearance of 4.87m enabling larger vehicles to fit under it with ease. The bridge will be reinforced to ensure that the removal of earth will not have an adverse impact on its structural integrity. As the bridge cannot be widened, traffic signals will be provided on the bridge in both directions to ensure road users safety. Pedestrian signals are also proposed to manage movement safely through the bridge. To highlight the bridge to road users and to ensure only suitable vehicles use the access, a low bridge sign and fixed height barrier are proposed at the start of Little Park Road. In addition to the works to increase the height limit under the bridge, a section of Little Park Farm Road will be resurfaced as it is currently in a poor state of repair. A French Drain/Swale will be created to the east of the road to ensure surface water is dealt with



appropriately. A copy of the Approval in Principle with Network Rail is appended as Appendix G (together with a report from Railton TPC Ltd and plan showing the works to the bridge)

- 6.5 There are no other issues to prevent the site coming forward for its allocated use and indeed following the approval of the highway related works, an application is due to follow on for B2/B8 floorspace across the whole site.
- 6.6 To assist these representations and to demonstrate the suitability, availability and achievability of this employment allocation, the representations are supported by the following documents in Appendices D, E and F:
- Ecology - EPDM – demonstrating that, following a series of ecological surveys since 2018, there is negligible potential for adverse impacts on vegetation and habitat loss as well as on notable and protected species, but significant opportunities for substantial ecological enhancement. There is therefore no ecological related reason for this allocated employment site not to deliver the proposed employment opportunities.
  - Access and Highways – In addition to the immediate access improvements proposed, Railton TPC Ltd have assessed the wider accessibility of the site and confirmed that it compares favourably with the other allocated sites in the current draft Plan. Attention is particular drawn to its location enabling sustainable pedestrian, cycle, and bus access including direct access to Swanwick Railway Station. There is therefore no accessibility or highways impact reason for the allocated employment site not to deliver the proposed employment opportunities.
  - Market Interest- Vail Williams letter of 16 December attached to report from Properonomics: Employment Land Report
- 6.7 It is therefore intended, and subject to planning permissions being approved in a timely manner, that this employment site can start to deliver employment floorspace from 2021.
- 6.8 Notwithstanding the above positive reasons for retaining the allocation, the 2017 Draft Fareham Local Plan 2036 was published and under paragraph 6.11 the plan ‘seeks to retain the existing deliverable employment allocations by re-allocating them’ and meets the need by extended and intensified allocations and a new allocation within an existing industrial area at Standard Way, Wallington. The allocations were in Policy E2: Employment Allocations. This produced a large overallocation of mixed industrial (of 54,267 m<sup>2</sup>), see para 6.17, table E4. This was to allow for some flexibility in the market (para 6.18).

- 6.9 However, Little Park Farm was omitted from the employment allocations, but those parts of the site which had already been developed were included as new employment areas under Policy E3. The balance of the area of the former allocation remained safeguarded.
- 6.10 The regulation 19 draft Local Plan continued the 2017 draft's approach of excluding Little Park Farm from the allocated sites, with only the developed part within Policy E5: Existing Employment Areas. However, the Plan went further and now, the balance of the existing allocation was removed from the urban area and designated as countryside.
- 6.11 The justification for excluding the site is not clear or justified. The evidence base for the Plan includes A Business Needs, Site Assessments and Employment Land Study by Lambert Smith Hampton (January 2019 with Addendum August 2019) for Fareham Borough Council. The Table at paragraph 7.9 is a list of the identified key allocated and potential new employment sites at August 2019 *which are capable of delivery subject to infrastructure, planning and land ownership constraints*. It includes Little Park Farm at Segensworth showing it potentially coming forward between 2020-2025 (possible timescale) with the comments: *Excellent location and potential, access constraints*.
- 6.12 Importantly the report concludes at 8.2 that:
- Whilst there are a limited number of potential employment sites which are under threat of policy change to residential or non-employment uses, we believe all potential employment sites should be retained in the emerging Local Plan.*
- 6.13 Furthermore, the report concludes:
- In our opinion it is far preferable to have a surplus of employment land in the Local Plan, wherever possible, in order to enhance the choice and variation to developers and occupiers (arguably supply creates and attracts demand) however all the sites recognised must be viable and have a realistic prospect of development within a reliable delivery period.*
- 6.14 However, despite all these very positive conclusions its detailed proforma (Ref 3025) the site is given a low score of D because of the access constraints and the information set out is highly contradictory. The conclusion states that the location of the Little Park Farm site and the surrounding uses makes this site a viable employment site with further scope for development; however the access constraints are currently limiting further expansion of this site. The negative comments all relate to the access issue which has been shown to be out

of date and in fact the landowner and developer made sure that the Council and its advisers were kept fully up to speed over the progress being made to successfully resolve the access issues.

- 6.15 Similarly, the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2020 includes the site as Ref 3025 as a Discounted Employment Site. However, the reason given for discounting an existing employment site states: *The site is contrary to emerging policy for development in the countryside and there is no requirement to allocated additional land to meet employment need.* The site is concluded to be AVAILABLE and ACHIEVABLE but not SUITABLE. This cannot be a rational conclusion to be applied to an existing employment site. The only possible explanation for why it is suddenly no longer considered suitable is because it has been redesignated as countryside, but this redesignation as countryside does not appear to have been made for any positive landscape related or public accessibility reasons. It is suggested that the deallocation came first and then the land redesignated as countryside rather than vice versa. Yet, there are no other reasons given for the sudden unsuitability of the land for employment purposes. Moreover, most of the site becomes countryside apart from pockets of existing uses which remain as existing employment allocations and the existing access as far as the railway bridge remains within the settlement boundary, but there are no linkages between these sites and the main access route. It all suggests, for reasons that cannot be fully understood and have certainly not been explained of a very hurried approach which has not been properly thought through.
- 6.16 Furthermore, the SHELAA assessment is completely in error in suggesting that the site was undeliverable without public funds; there has never been any suggestion that the site required public funds to come forward.
- 6.17 This section has demonstrated that the site has been correctly identified as an employment site in the current adopted Plan and that there is no planning or other reason suddenly to exclude it as an employment site moving forward to the new Plan.
- 6.18 The need to reinstate the site as an employment site has been demonstrated to be necessary if Fareham is to meet its seemingly ambitious employment objections, given the very real concerns that have been identified over the allocations they are seeking to rely upon and the very serious issues facing the provision of employment land.
- 6.19 The PPG contains the following section:

What evidence can be used to help determine whether land should be reallocated for a more deliverable use?

*When considering whether there is a realistic prospect of an allocated site being developed for its intended use, it may be relevant to take into account factors such as:*

- *the length of time since the site was allocated in the development plan;*
- *the planning history of the site including any planning applications or pre-application enquiries;*
- *whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and*
- *whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.*

*Where an alternative use for the allocated site is proposed, it will also be relevant to consider the extent to which evidence suggests the alternative use would address an unmet need, as well as the implications for the wider planning strategy for the area and other development plan policies.*

- 6.19 When these criteria are properly applied on the basis of the evidence available it is clear that this site should not have been deallocated but retained as an allocation to help deliver much needed employment floorspace to assist in meeting the Council's stated economic and wider objectives on prosperity.
- 6.20 Although not directly under the control of Fareham BC it should be noted that the Little Park Farm allocation extends to include an employment allocation to the east within the district of Winchester City Council. This land is also allocated for employment purposes and relies on the access through the land within Fareham BC. The implications for Winchester's employment land supply are a further issue of concern.

## 7.0 **Modifications Required to the Plan to Make it Sound**

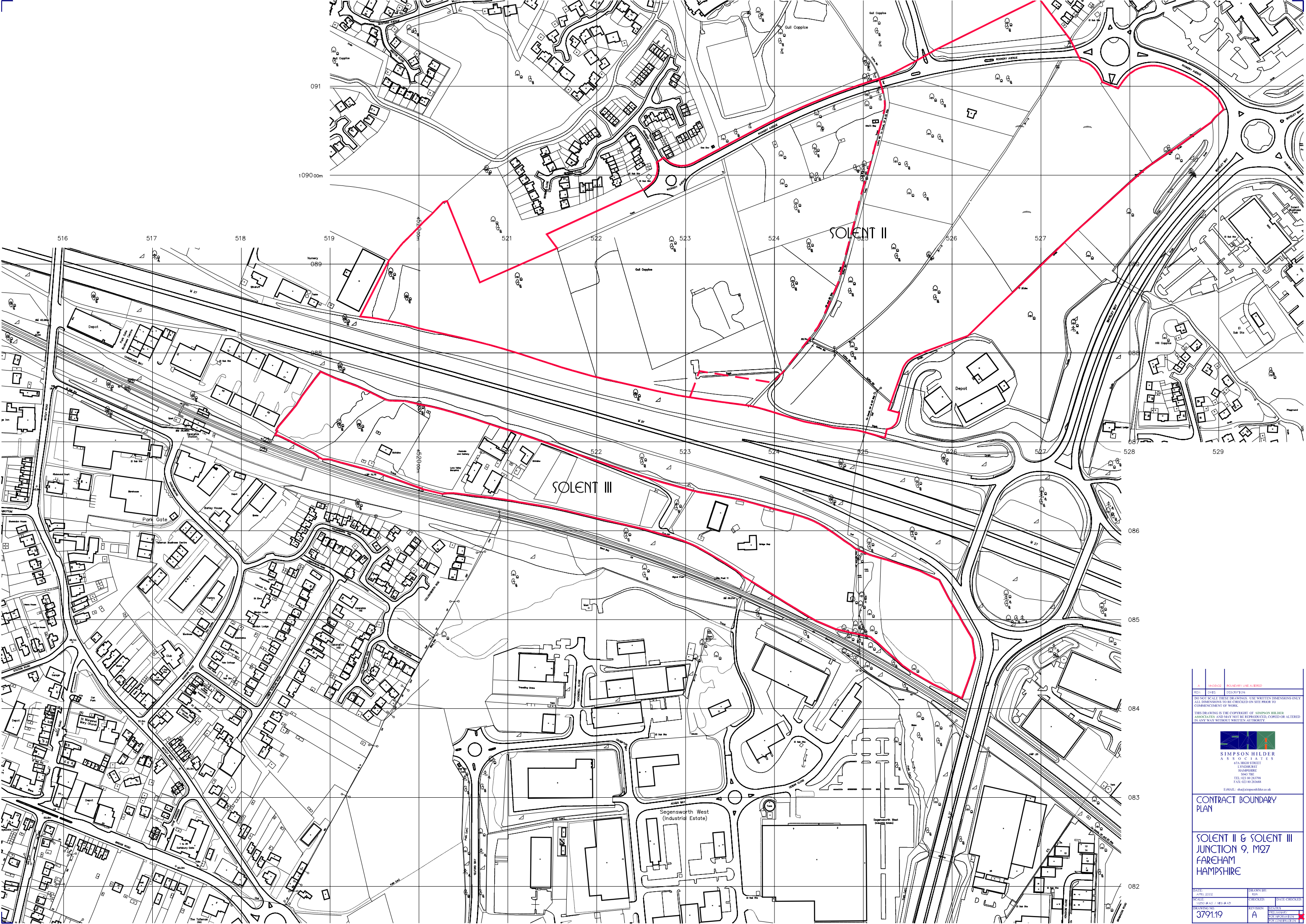
- 7.1. There is no need to revisit the arguments and issues which have been set out at length in the earlier sections and which demonstrate that the Plan as drafted is UNSOUND. The modifications required are set out below in bullet form. It will be immediately clear that the required work to ensure that the Plan is SOUND extends well beyond detailed amendments to drafted policy wording; a fundamental review of the Plan and the basis upon which it has been prepared is required.
- 7.2. The revised approach to the preparation of the Plan, with consequential implications for the redrafting of **Strategic Policy E1**, requires a thorough reassessment of the sites/floor space of the Borough and Sub-Region's needs should be undertaken based on the PPG; it is premature to rely on an old economic assessment when a new one has been commissioned. The current approach is clearly UNSOUND and a more detailed assessment should be undertaken.
- 7.3. In addition to the above the Council also requires to readdress its allocated employment sites, and in particular Policy E2 as to the suitability and achievability of this site in terms of amount of floorspace and timing.
- 7.4. The Council is clearly underproviding sites and potential floorspace to meet its economic objectives and vision. The Council needs to make further allocations, and this should include the reinstatement of Little Park Farm as an employment allocation; a site which is suitable, available and achievable and subject to planning, deliverable within a five year period. There is no sound reason or justification for its deallocation.
- 7.5. It follows that the Plan cannot be made SOUND without a fundamental review of the main elements of the employment policies, including methodology and will require additional sites to be allocated; Little Park Farm should be reinstated as an allocation in the Plan, being suitable, available and achievable and, indeed, deliverable.

## APPENDIX A



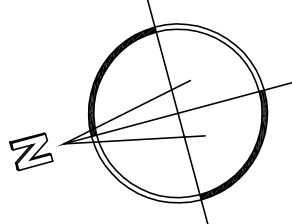
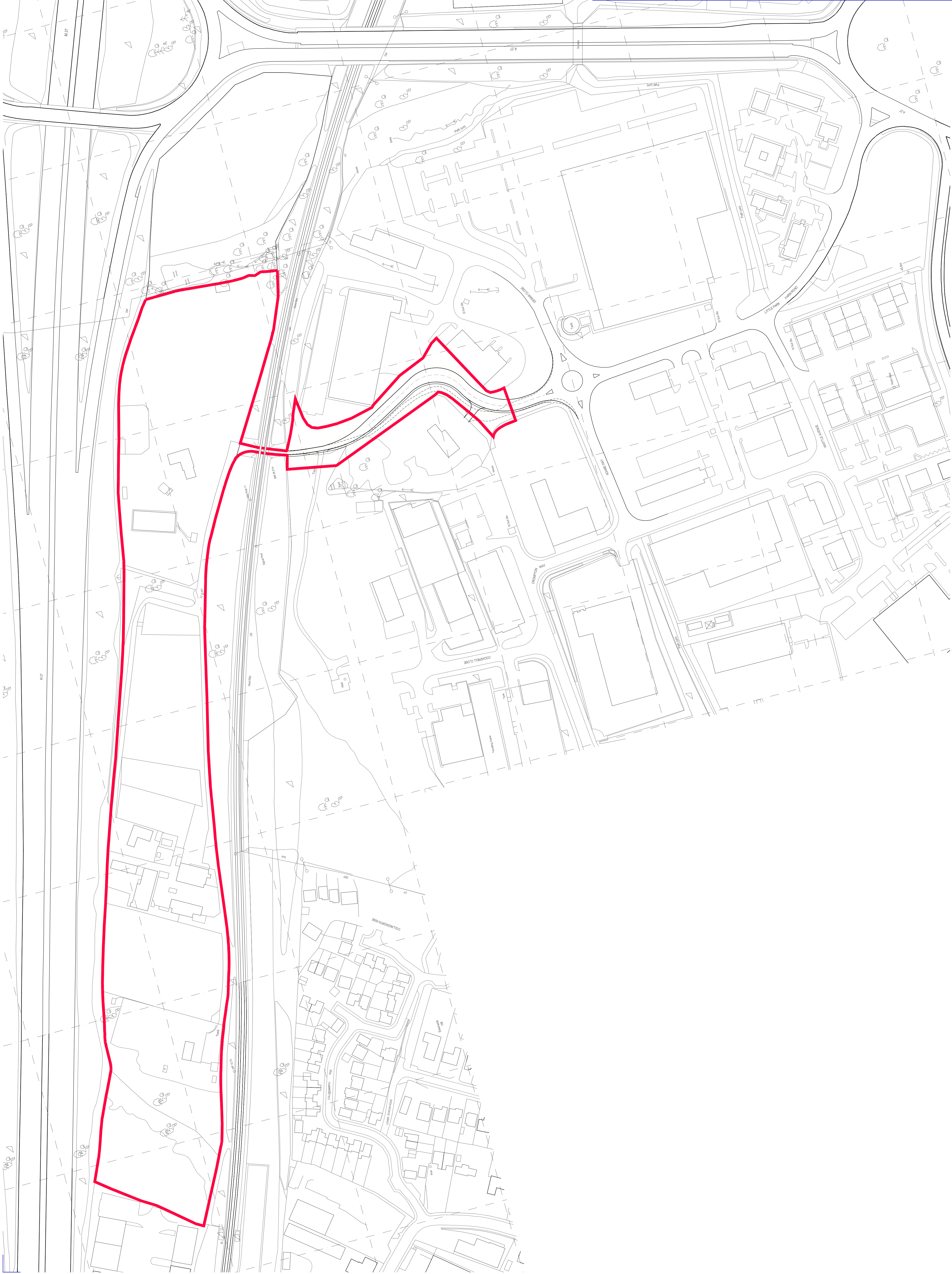
## APPENDIX B

## Appendix A



A		REVISIONS	DATE	DESCRIPTION
1		01/04/2008	01/04/2008	01/04/2008
THIS DRAWING IS THE COPYRIGHT OF SIMPSON HILDER ASSOCIATES AND MAY NOT BE REPRODUCED, COPIED OR ALTERED IN ANY WAY WITHOUT WRITTEN AUTHORITY.				
 SIMPSON HILDER ASSOCIATES 47A HIGH STREET LYNDSEY HAMPSHIRE SO40 1PE TEL: 01263 825788 FAX: 01263 825888 E-MAIL: sh@a@smpsonhilder.co.uk				
CONTRACT BOUNDARY PLAN				
SOLENT II & SOLENT III JUNCTION 9, M27 FAREHAM HAMPSHIRE				
DATE	APRIL 2008	DRAWN BY	BSH	CHECKED
SCALE	1:1000 A3 / 1:1500 A2	DATE	01/04/2008	01/04/2008
DRAWING NO.	3791.19	STATUS	REVISION	FOR CONSTRUCTION





REV.	DATE	DESCRIPTION	DR.	CHK.

OTHER THAN FOR THE PURPOSES OF PLANNING, DO NOT SCALE THESE DRAWINGS.  
DIMENSIONS SHALL BE TAKEN FROM THE DIMENSION LINES.  
ALL DIMENSIONS TO BE CHECKED ON SITE PRIOR TO COMMENCEMENT OF WORK.

THIS DRAWING IS THE COPYRIGHT OF SIMPSON HILDER ASSOCIATES AND MAY NOT BE REPRODUCED, COPIED OR ALTERED IN ANY WAY WITHOUT WRITTEN AUTHORITY.



SIMPSON HILDER ASSOCIATES LIMITED

67a High Street Lyndhurst Hampshire SO43 7BE

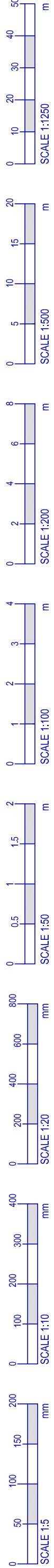
T: 023 80 283798 F: 023 80 283688 E: sha@simpsonhilder.co.uk

SITE PLAN

DRAWING STATUS: PLANNING

PROPOSED DEVELOPMENT  
LITTLE PARK FARM  
SEGENSWORTH  
HAMPSHIRE

DATE	DECEMBER 2015	DRAWN BY	TJD
SCALE @ A3	1:1250	CHECKED BY	GL
DATE	DEC 2015	APPROVED BY	SH
6504	102		





## Appendix B

Mr Richard Ivory  
Head of Legal  
Southampton and Fareham and Legal Services  
Partnership  
Southampton City Council Civic Centre  
Southampton  
SO14 7LT

4 December 2020

By email only: [Alex.Russell@southampton.gov.uk](mailto:Alex.Russell@southampton.gov.uk)

Your Reference:

Direct Line: 02380 930 320

Our Reference: MCK/F3622-5

Direct Fax:

Email: [mgilks@thrings.com](mailto:mgilks@thrings.com)

## JUDICIAL REVIEW PRE-ACTION PROTOCOL LETTER

Dear Sir

### De-allocation of employment land at Little Park Farm, Segensworth from the Local Plan

1. This is a pre-action letter under the Judicial Review Pre-Action Protocol in support of an application for permission to apply for judicial review to quash the Council's decision to omit our client's site at Little Park Farm from the regulation 19 draft of the Fareham Local Plan.

### The Claimant

2. The proposed Claimant is Frobisher Developments Limited.

### The Defendant

3. The proposed Defendant is Fareham Borough Council ("the Council").

### The decision being challenged

4. The decision of the Council to omit the Claimant's land at Little Park Farm, Segensworth (2993) from the Fareham Local Plan 2037, regulation 19 draft.

### Orders Sought

5. The following orders will be sought from the Court:

(a) an order quashing the regulation 19 local plan insofar as it relates to Little Park Farm or would revoke the existing Local Plan in respect of Little Park Farm;



---

(b) a mandatory order that the Council consider the inclusion of Little Park Farm as an employment allocation within the urban boundary in the Local Plan 2037;

(c) costs.

## **Factual and Legal background**

### *The 2015 Local Plan*

6. Policy DS18: Employment Allocations of the Local Plan Part 2: Development Sites and Policies (June 2015) allocated five sites for employment uses including Little Park Farm. The reasoned justification for the policy identified that there may be a need to improve the existing access under the railway line (para 5.25). Little Park Farm was also included within the urban area boundary.

### *The 2017 draft Local Plan*

7. The 2017 Draft Fareham Local Plan 2036 was published. By para 6.11 the plan 'seeks to retain the existing deliverable employment allocations by re-allocating them' and meets the need by extended and intensified allocations and a new allocation within an existing industrial area at Standard Way, Wallington. The allocations were in Policy E2: Employment Allocation. This produced a large overallocation of mixed industrial (of 54,267 m<sup>2</sup>), see para 6.17, table E4. This was to allow for some flexibility in the market (para 6.18).
8. Little Park Farm was omitted from the employment allocations, but those parts of the site which has already been developed were included as a new employment areas under Policy E3. As a consequence it has been removed from the urban area. The whole site remained within the urban area at that point.

### *The Environmental Report on the 2017 draft*

9. The Environmental Report with the draft Local Plan considered six potential strategic alternatives of which it was said 'three of these were not considered to be reasonable and are not considered in the appraisal' (para 4.4.8). It continued:

"Strategic alternatives for employment development are summarised in Table 4.4, together with an outline of the reasons for their selection and, where relevant, eventual rejection."
10. All six alternatives were shown in table 4.4 which said that five of these were 'Not considered to be a reasonable alternative'. The five discounted included two (options 4 and 5) which included Little Park Farm. In both cases the reasons for rejecting the option as a reasonable alternative included 'Significant delivery constraints at Little Park Farm'. The four other options included as 'reasons for selection' 'Reduction of existing Local Plan allocations because of problematic site access and deliverability at Little Park Farm'. The only option which was not rejected was the preferred option.
11. Appendix F of the report carried out a high-level assessment of individual sites, including Little Park Farm (2993). That found the site to be positive or neutral against all SEA objectives, one of only 15 housing or employment sites not to have negative or mixed/uncertain effects.
12. The Environmental Report contained Appendix I: High Level Assessment - Strategic Employment Alternatives which purported to look at options 4, 5 and 6, but only considered the new sites in those options, rather than the effect of the options as a whole. Paragraph 5.2.6 of the report said:

---

“Of the three strategic employment alternatives which were considered to be reasonable, Option 4 was assessed as being the most sustainable at the high-level stage. This was a result of both the overall amount of employment land being provided for in comparison to identified needs, together with the potential for site-specific effects at employment sites at Wallington including: limited accessibility by sustainable transport modes; proximity to the M27; impacts on the SPZ; or losses of priority habitat, BMV agricultural land and/or minerals deposits.”

*Frobisher’s representations*

13. Frobisher objected to the exclusion of the site, saying that access improvements were being considered. Frobisher continued to keep the Council informed of progress in resolving access. On 19<sup>th</sup> December 2018 Frobisher informed the Council’s consultant, Robin Dickens of Lambert Smith Hampton, that access improvements had been agreed with the County Council and Network Rail and the site ‘is fully deliverable’. Mr Dickens welcomed this and said he would ‘incorporate the current site status in our advice’ (email 19<sup>th</sup> December 2018).
14. On 6<sup>th</sup> August 2019 a further update was given by Frobisher to the Council and LSH. The County Council were to be paid £425,000 for access; there was a proposal to Network Rail for 4.85 m clearance (so allowing almost all heavy goods vehicles to access the site); and it was possible to get 16,000 m<sup>2</sup> of employment floorspace on the site.

*The Business Needs, Site Assessments and Employment Land Study*

15. A Business Needs, Site Assessments and Employment Land Study (January 2019 with addendum August 2019) was prepared by Lambert Smith Hampton for the Council. This remains as part of the evidence base for the plan.
16. In respect of Little Park Farm the Study said, in particular:

“1.6: Would employment development on this site be viable, without public funding to resolve infrastructure or other on-site constraints? No

Market Appraisal Site is an existing employment allocation within the urban area and has no neighbour constraints. However, highways access constraints mean only low traffic generating uses can be achieved unless a significant highways solution can be found. The site is currently considered suitable for low intensity open storage, though highly constrained by access issues. Widening of the access would significantly improve its marketability and given its location would be a suitable employment site.

Known constraints and infrastructure requirements Site access is via a 3.7m wide rail underbridge, which would require control measures for vehicles and pedestrians. Traffic

signals would appear to be feasible, linked to a separate pedestrian phase. There is a potential vulnerability if the underbridge became obstructed, such as by a large / high vehicle.

2.4: Is there public funding committed (or likely to be provided) sufficient to overcome infrastructure or on-site constraints to make employment development viable? No

Recommendation Site Score D - Below Average. The location of the site and the surrounding uses makes this site a viable employment site with further scope for development; however, the access constraints are currently limiting further expansion of this site.”

---

17. Notwithstanding the date on the document and its contents, on 30<sup>th</sup> September 2019 Mr Dickens informed Frobisher that they were still editing the Study and there was recognition that the new access can be delivered.

18. On 27<sup>th</sup> Feb 2020 Frobisher signed an Asset Protection Agreement with Network Rail.

19. On 2<sup>nd</sup> April 2020 Mr Dickens at LSH acknowledged with respect of the Study:

“... you are right that para 1.6 is inaccurate to my mind. In so much that with our subsequent knowledge of the finalised legal agreement with HCC and revised engineering solution to improve the bridge access - the cost of which will be reflected in the land value - therefore to develop the site would not require public subsidy.

I wish to discuss with Gayle to review the grade D scoring, and in fairness to Fareham we at LSH had ascribed this at the time (the initial work on this commenced in 2018 I recall).”

*The Strategic Housing and Employment Land Availability Assessment*

20. The Strategic Housing and Employment Land Availability Assessment (SHELAA) September 2020 is another evidence base document.

21. Little Park Farm is mentioned as a discounted employment site (page 243). At page 247 in discussing the site the report said:

“Highways/Pedestrian Access ‘The site would be appropriate for a development with 11,200 m2 of employment development subject to a full Transport Assessment. Given the site’s proximity to Swanwick Station, a pedestrian/cyclist link from the west end of the site should be investigated. To mitigate the length of the development cul de sac and its vulnerability, should obstruction occur at the bridge etc, an emergency vehicle link should be investigated leading west from the site to Chandlers Way and Botley Road

Reason for Discounting ‘The site is contrary to emerging policy for development in the countryside and there is no requirement to allocated (sic) additional land to meet employment need.’

22. The site was listed as available and achievable but not as suitable.

*The regulation 19 draft Local Plan*

23. The regulation 19 draft Local Plan continued the 2017 draft’s approach of excluding Little Park Farm from the allocated sites, but in addition it with only included the developed part within Policy E5: Existing Employment Areas. It also omitted the site from the urban area The draft said (para 6.24):

“It is recognised that the proposed supply of employment floorspace exceeds the floorspace requirement identified. This allows for flexibility in the delivery of sites over the plan period and flexibility for the market should actual take-up be greater than that which is anticipated and being planned for.”

*The Environmental Report on the 2020 draft*

24. The Environmental Report (dated November 2020) on the regulation 19 draft gave the same strategic employment alternatives and dealt with them in the same way as in the 2017 report (see 2020 para 4.5.6 and table 4.4). In particular, Little Park Farm was again dismissed for ‘Significant delivery constraints’ and ‘problematic site access and deliverability’.

- 
25. In the individual assessment of site allocation options Little Park Farm, Segensworth North West (2993) was omitted entirely.
26. In Appendix G: Rationale for Site Selection or Rejection, the sole reason for rejecting Little Park Farm, Segensworth North West (2993) was given as 'Rejected 2017 - no highways access solution identified'. The high-level assessment again failed to address the existing allocations in the options, including Little Park Farm.

#### ***Legislation and Guidance on the Local Plan process***

27. The Council is preparing a development plan document (the Local Plan 2037) under the Planning and Compulsory Purchase Act 2004. It has just published the draft local plan for representations under the Town and Country Planning (Local Planning) (England) Regulations 2012, reg 19. The Council should only submit the plan to the Secretary of State if they consider it to be lawful and sound: see Planning and Compulsory Purchase Act 2004, s 20(2). The Planning Inspectorate's *Procedure Guide for Local Plan Examinations* (6<sup>th</sup> Edition, November 2020) emphasises 'Before submission, the LPA must do all it can to resolve any substantive concerns about the soundness or legal compliance of the plan' (para 1.2).
28. The Inspectorate advise (para 1.5):

"If the LPA wish to make changes to the plan following the Regulation 19 consultation and before submission, and wish the changes to be considered as part of the submitted plan, they should prepare an addendum to the plan containing the proposed changes. The addendum, together with a sustainability appraisal [SA] and Habitats Regulation Assessment [HRA] of the proposed changes if they are significant, should be published for consultation, on the same basis as the Regulation 19 consultation, before the plan is submitted for examination."

#### ***Strategic Environmental Assessment***

29. The Council accepts it needs to carry out a strategic environmental assessment under the Environmental Assessment of Plans and Programmes Regulations 2012. It is required therefore to produce an environmental report (regulation 12(1)) which by regulation 12(2):

"shall identify, describe and evaluate the likely significant effects on the environment of-

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme."

30. The report shall also include such of the information referred to in Schedule 2 which may reasonably be required (regulation 12(3)). These include (Schedule 2, para 8):

"An outline of the reasons for selecting the alternatives dealt with"

#### ***The availability of Judicial Review***

31. The decisions of a local planning authority on the regulation 19 draft of a local plan are subject to judicial review: *R(Manydown Co) v Basingstoke and Deane Borough Council* [2012] EWHC 977 (Admin) at para 86 per Lindblom J; *R(IM Properties) v Lichfield District Council* [2014] EWHC 2440 (Admin) at para 71 per Patterson J; and *R(CK Properties (Theydon Bois) Ltd) v Epping Forest District Council* [2018] EWHC 1649 (Admin) at para 49-53 per Supperstone J.

- 
32. The role of the Court at this stage is different to that of the Planning Inspector conducting an examination. The Court is concerned with the lawfulness of the Council's decision to remove the Little Park Farm allocation from the development plan. An examination would consider whether the plan which is put forward is sound. The remedies sought in these proceedings will include requiring the Council to revisit the planning merits of keeping the employment allocation in the development plan, which is not the question before the Inspector.
33. Since a judicial review would be of a decision under the Planning and Compulsory Purchase Act 2004 the time for bringing proceedings is promptly and within three months: CPR 54.5, not the six-week period applicable to judicial review claims under any of the planning Acts 1990.

#### **Grounds of challenge**

34. The proposed removal of Little Park Farm from an allocated employment site within the urban boundary in the development plan was unlawful for the following reasons.
- (i) *The Council erred in considering that the deliverability of Little Park Farm was constrained by access issues, in circumstances where it was accepted by the Council that those issues had been resolved by Frobisher and public funds were not needed to resolve this. The Council therefore failed to have regard to the relevant considerations of the actual position, had regard, irrelevantly, to the incorrect position and made a material error of fact;*
35. The environmental report constitutes statutory reasons as reasons have to be given for the identification of reasonable alternatives in the SEA process. The only reason which it gives for removing the Little Park Farm site from the development plan is the ability to deliver access. That reason is also contained in the Land Study. It is not open to the Council to deny that the statutory reasons given were actually its reasons.
36. As the Council's consultant, Mr Dickens, acknowledged in April 2020, that view was no longer correct (even if it had been a reasonable view at any earlier stage). The Environmental Report failed to refer to that agreed position and so the Council's decision to exclude the site was on the false basis that the deliverability of the access was doubtful.
37. The Council therefore failed to have regard to a relevant consideration which was the actual position that access could be secured and the site delivered without recourse to public funds; had regard to an irrelevant consideration which was the false position that there was an issue about deliverability; and made a material error of fact in asserting that there were significant delivery constraints and problematic site access and deliverability.
- (ii) *Whilst the SHELAA does not contain the statutory reasons for rejecting the site, it misinterprets policy when suggesting that emerging policy towards the countryside is a reason for not allocating the site. For completeness, employment land availability is not a reason given for not allocating sites - the plan seeks an oversupply to maintain market competitiveness*
38. The SHELAA refers to additional objections to development on the Little Park Farm site. It does not constitute statutory reasons (those are in the Environmental Report), nor does there appear to be any reference to its comments on Little Park Farm elsewhere in the documentation.
39. The first point made in the SHELAA against the site is based on a misinterpretation of policy which amounts to an error of law. It is wrong to say that emerging policy for development in the countryside is against the allocation. The Local Plan allocation was based on policies which were more protective of the countryside, in particular the 2011 Core Strategy which itself was based on the Planning Policy Statement 7 approach of preserving the countryside for its own sake. That policy protection has been weakened by the NPPF. There is nothing in emerging policy at national or local level which provides any greater discouragement to development in the countryside. The site was included in the urban area because of its

---

allocation, and is proposed to be removed from the urban area because of the proposed de-allocation. The countryside boundaries therefore reflect the site allocation, rather than the site allocation reflecting the countryside boundary. The SHELAA does not identify any emerging policy which gives rise to a new objection to the development, and there is none. This part of the SHELAA is therefore based on a misunderstanding of the meaning of the policy and so on an error of law.

40. The Council has not considered its employment allocations to be bound by the identified employment need: it is prepared to over-allocate. Therefore the reference to there being 'no requirement' to allocate additional land was not a reason why the site was deallocated. It does not weigh against any errors in the Council's decision making.
41. Any error in the decision making process may have affected whether the site was included, so only one of the reasons needs to be unlawful for the Council to need to reconsider.

#### **Details of the action the Council is expected to take**

42. The Council is invited to agree:
- (a) to consider the retention of Little Park Farm as an employment site allocation within the urban boundary in the development plan as a change to the current draft plan;
  - (b) to agree to make that change;
  - (c) to correct the errors about the deliverability of the site in the environmental report
  - (d) to consult on that change in an addendum to the regulation 19 draft and as a correction to the environmental report.

#### **Details of Interested Parties**

43. There are no interested parties.

#### **Other applications made**

44. An application will be made for an interim injunction preventing the Council from submitting the draft Local Plan to the Secretary of State pending the resolution of these proposed proceedings.

#### **Further information required**

45. The Council is asked to provide copies of:
- Any notes, emails or letters relating to the allocation, or otherwise, of the Little Park Farm site in this Local Plan, which have been produced or received by the Council and have not been published by the authority.

#### **Address for reply and service of court documents**

46. At Thrings LLP, Stuart Court, Salisbury Road, Romsey, SO51 6DJ Matt Gilks - [mgilks@thrings.com](mailto:mgilks@thrings.com), contact details - 02380 930 320 or 07387 023890 and Alex Madden - [amadden@thrings.com](mailto:amadden@thrings.com), contact details - 01179 309575 or 07766517670.

#### **Timetable for a response**

47. Please reply substantively within 14 days of the date of this letter.
48. We look forward to hearing from the Council.



---

Yours faithfully

A black rectangular redaction box with a thin red border, used to obscure a signature.

**Thrings LLP**

cc. Richard Jolley, Director of Planning & Regeneration

## Appendix C

**Employment land report**

**Little Park Farm, Segensworth, Fareham, Hampshire**

**December 2020**

**Prepared for Frobisher Developments Ltd**

**for representations in response to the Fareham Local Plan 2037**

## **Contents**

- 1.0 Introduction
- 2.0 Executive Summary
- 3.0 Policy Context
- 4.0 Supply
- 5.0 Demand
- 6.0 Employment Land Guidance and SHELAA
- 7.0 Business Needs, Site Assessments and Employment Land Study
- 8.0 Summary and Conclusions (chapter summaries)

## **1.0 Introduction**

- 1.1 Frobisher Developments Limited (FDL) own development land known as Little Park Farm at Segensworth in the borough of Fareham, Hampshire. The site, which is located close to Junction 10 of the M27 motorway, is allocated to provide up to 11,200 sq m of B2/B8 floorspace.
- 1.2 It has been assessed favourably in the council's "Business Needs, Site Assessments and Employment Land Study" (2019) with a caveat to the effect that the access could be improved. Steps have been taken to improve the access but in the meantime the council has proposed to de-allocate the site in the emerging Fareham (Reg. 19) Local Plan 2037.
- 1.3 We understand from FDL that Little Park Farm has attracted market interest; that further development of the site is now proposed, including access improvements; and that the site is suitable, available and viable, meaning that development is achievable and deliverable.
- 1.4 The purpose of our report is to review the employment land evidence underpinning the proposed Local Plan to help test the merits or otherwise of de-allocating Little Park Farm.
- 1.5 Propernomics specialises in property research and analysis, including economic development consultancy, for private and public sector clients. The author is an experienced expert witness in these matters and a long term resident of Hampshire with local property market knowledge.

## **2.0 Executive summary**

- 2.1 The practical day to day choice of employment floorspace is limited and on a downward trend. Market feedback (within Lambert Smith Hampton's employment land evidence and advice from Vail Williams, plus former representations by the Chamber of Commerce) suggests that the situation is problematic for the business community. A simple summation of floorspace in the pipeline does not reveal these difficulties.
- 2.2 As explained in our report, alternative employment sites suggested in the Local Plan, upon which its soundness depends, are not without their problems and they tend to serve different markets.
- 2.3 Flexibility for a 17 year Local Plan is important, especially given uncertainties about the pace of development of the borough's major sites and how the balance between jobs and homes will unfold. To deallocate an allocated site like Little Park Farm removes flexibility for the council and the market.
- 2.4 Changes to the Use Classes Order and greater freedoms for changes of use created by Permitted Development also add to the need for flexibility in the Local Plan.
- 2.5 Economic recovery is especially important going into the next decade and employment generating land and premises, including Little Park Farm, are priority assets for the local economy to safeguard, especially in the context of the economic development policies of the borough and the sub-region.
- 2.6 The development of Little Park Farm will bring numerous benefits, including for example:
- Additional headroom in the proposed Local Plan for business growth and employment that will otherwise be constrained bearing in mind the qualitative and locational differences of sites (which are disguised by bald floorspace totals).
  - Responding to the market pressures and the tendency for floorspace demand to exceed supply, cause rental growth and limit choice – problems identified by both Lambert Smith Hampton and by Vail Williams.
  - Helping redress both a loss of existing employment floorspace at Welborne (due to new housing) and the acknowledged risks to the Welborne employment land trajectory during the proposed plan period



- Complementing without detracting from Daedalus due to being in different subsets of the market.
- Helping redress a loss of employment floorspace that cannot be fully realised at Solent 2 due to the reality of its constraints.
- Additional flexibility to help the borough achieve its objective of better self-containment.
- Less pressure for loss of employment generating land uses in the borough.
- Construction jobs and positive supply chain multiplier effects at a time when renewed economic activity is especially important.
- Helping to cater for strategic growth sectors and companies seeking space.
- Strategic fit with the national and local/LEP industrial strategies.
- Support for the sub-regional/cross-border role of Fareham within the M27 corridor.
- An estimated 150 to 270 ongoing operational jobs as a consequence of the development proposed by the current allocation.

2.7 We conclude that Little Park Farm should not be de-allocated in Fareham's proposed Local Plan and steps should be taken to proactively support the work being done on access improvements and the site's development.

### 3.0 Policy context

- 3.1 We defer to FDL's planning consultants (Southern Planning Practice) on Town Planning matters but it is appropriate that we should comment in our report on the council's Economic Development objectives, related policies and the underlying employment land evidence.
- 3.2 We start this chapter by reviewing the council's corporate strategy, then relevant objectives within the proposed Fareham Local Plan 2037 and Local Plan Part 3 (The Welborne Plan).

#### Fareham Corporate Strategy

- 3.3 The council's overarching objectives are set out in the document entitled, "Fareham, a Prosperous and Attractive Place to be, Corporate Strategy 2017-2023" (Reviewed December 2019).
- 3.4 Importantly, page 4 says the borough is "open for business". This implies that business growth, economic prosperity and employment are to be welcomed and that proper provision will be made in the Local Plan for a flexible supply of employment land to accommodate this ambition. As we have progressed with our research (see below) we have become increasingly concerned that the de-allocation of Little Park Farm as an employment site is inconsistent with this fundamental part of the corporate strategy.
- 3.5 Page 5 of the strategy focuses on the development of the Enterprise Zone and an innovation centre in the Daedalus area. This location is distinct from the Segensworth area, being located closer to Gosport in the southern part of the borough. This is a less well regarded location for business (as shown in market feedback and the relative scoring of sites in the employment land evidence); public investment in infrastructure and buildings has been necessary to catalyse development.
- 3.6 The strategy document promotes "high flying plans" for Solent Airport, confirming: "Solent Airport at Daedalus is owned by Fareham Borough Council. Forming part of the Solent Enterprise Zone, the site features two new business parks: Faraday and Swordfish"
- 3.7 The corporate strategy states: "Underpinned by an unflinching commitment to supporting and encouraging business growth, Fareham Borough Council's vision for the award winning Solent Airport at Daedalus has already begun to take shape." Whilst it makes sense to promote this part of the borough for economic development, not least to help reduce commuting from the Gosport peninsula and to create local job opportunities for Gosport, this is a long term site and should not

have the unfortunate by-product of displacing (mathematically) an employment site at Segensworth. These are separate sub-markets within Fareham that need their own supply and Little Park Farm is now part of the borough's short term supply.

- 3.8 The strategy also refers to Welborne, by Junction 10 of the M27: "Over the coming years, the new development at Welborne, which lies to the north of Fareham, will also play a significant role in creating jobs for the Borough." As explained later in our report, parts of the borough around Segensworth, including Little Park Farm, are rated highly in market terms for their location close to the M27; Welborne's employment is to help counterbalance the addition of homes.
- 3.9 Page 12 of the Corporate Strategy sets out "six corporate priorities" of which "Priority Four" has a business theme, i.e.:
- 3.10 "Maintain and extend prosperity by working with others to continue to support and promote the economic vitality of the Borough. Developing and improving vibrant town and district centres offering a range of shopping, leisure and employment opportunities, together with the delivery of an employment-led vision for Daedalus will be vital to achieving this."
- 3.11 Page 17 sets out greater detail on Priority Four, including endorsement of business growth and the need to attract new employers to the borough:
- 3.12 "We recognise that business growth is essential to the local economy, providing good quality jobs for local people and creating attractive, vibrant town and district centres. As well as supporting and protecting existing businesses we want to attract new employers to our Borough providing opportunities for future generations."
- 3.13 The employment capacity of Little Park Farm can play an important part in accommodating business growth, jobs and new employers. Hence its retention as an allocation would be consistent with the economic objectives of the strategy.

#### Fareham Local Plan 2037 (the proposed Local Plan)

- 3.14 Paragraph 2.10 of the proposed Local Plan 2037 affirms the council's vision for the borough including: "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 its associated jobs." Taking these points in turn:

- 3.15 Firstly, as confirmed by the employment land evidence and market feedback, Little Park Farm is located in an area that is attractive to the market. Secondly. Although environmental impact is outside the scope of our report, we note that development of the site would create positive socio-economic effects for the community. Thirdly, given that Little Park Farm is an existing, allocated site and on the cusp of further development there is no practical reason in market terms why it should not be afforded the same “support” as “existing employment areas”.
- 3.16 The vision in the proposed Local Plan (p.13) also signals the need for more self-containment (i.e. an improved choice of jobs as an alternative to commuting from/to the borough for work): “Fareham Borough will have a strong and diverse economy with improved levels of self-containment with people working from home or close to home, with opportunities for public transport use and other sustainable travel choices maximised.” The Welborne Plan suggests a ratio of about 1 job per home to help achieve a degree of self-containment.
- 3.17 If, as suggested by the vision, more of the borough’s residents are to work locally then the requirement for employment floorspace, net of home based working, will need to increase. Hence it is instructive to ask whether the planned rate of delivery of homes and jobs capacity at Welborne are synchronised or whether there is a risk of under or over provision of employment space prior to 2037. Para 4.12 and Table 4.2 of the Local Plan show that 4,020 out of 8,389 net new homes across the borough are attributable to Welborne. Table 6.3 shows that 52,000 sq m of business space is attributable to Welborne; the following table shows that its employment capacity is circa 1,927 jobs, or 3,322 if including the same ratio of employment in non B-class space/homes as suggested by the Welborne Plan.

Fareham Local Plan 2037 - jobs estimate for the employment floorspace suggested in Table 6.3 for the phasing of development at Welborne				
Use class	Floor area	sq m per job	Jobs capacity	% split
B1a	15,000	12	1,250	
B1c/B2	17,000	41.5	410	
B8	20,000	75	267	
Subtotal	52,000		1,927	58%
Non B-class jobs if at same ratio			1,395	42%
Total			3,322	100%

- 3.18 It is evident therefore that the aspiration for greater self-containment, at say one job per home (especially at Welborne), may not be met by 2037 – with an under provision on these figures of almost 700 jobs (3,322 jobs minus 4,020 homes).

- 3.19 If the same employment densities are applied to Little Park Farm then it could make a useful contribution of 149 to 270 jobs (average 210) depending on its use (11,200 sq m divided by either 41.5 sq m per job for B1c/B2 or 75 sq m per job for B8). This analysis suggests that the certainty of job creation at Little Park Farm is greater than the certainty that Welborne will deliver as many jobs as homes during the Local Plan period.
- 3.20 The vision outlined at pages 13/14 of the Local plan also states: “Significant road improvements will take place, such as changes at Junction 10 on the M27, and the Stubbington bypass, which will relieve traffic congestion issues. Wherever possible other highway works will be undertaken to support development and minimise the impacts to our highway network and those that use it.” We understand there are risks of further delay to some of this work, which may affect the delivery of employment floorspace upon which the Local Plan depends (e.g. at J10). Yet compared to Little Park Farm, the proposed Local Plan does not propose to deallocate these sites due to the need for road improvements – resolving such a need is seen as part and parcel of development. In the meantime FDL is making arrangements to improve the access to Little Park Farm which should be welcomed by the council and taken as a sign of progress and confirmation that Little Park Farm should remain allocated.
- 3.21 Para 2.12 of the proposed Local Plan sets out 12 Strategic Priorities which include addressing employment needs to create places where businesses want to locate, as well as protecting and enhancing employment areas required for future use. The development of Little Park Farm would be consistent with these objectives.

#### The Fareham Local Plan Part 3: The Welborne Plan

- 3.22 The Fareham Borough Council website explains that the new community at Welborne (immediately to the north of Junction 10 of the M27) will comprise “around 6,000 homes, supporting 5,700 jobs”, a ratio of almost 1 job per home (0.95).
- 3.23 Planning policy for Welborne is to be found in Local Plan Part 3. Chapter 5 (“Economy and Self-Containment”) includes two key principles, namely encouraging self-containment and supporting the economic growth of South Hampshire.
- 3.24 Para 5.1 states: “The daily needs of Welborne’s residents will be catered for through the provision of a mix of services and employment opportunities which are easily accessible from where they live.” The close proximity of homes and jobs within the community is emphasised: “The close co-location of homes with jobs, retail, services, education and recreation in Welborne

will provide the opportunity to satisfy employment and family needs within the local community, helping to encourage self-containment.”

- 3.25 The first principle of encouraging self-containment is supported by the statement that: “Welborne should provide a range of jobs so that residents have the opportunity to work locally. This will support the principle of self-containment by minimising residents’ need to travel between home and work.”
- 3.26 This approach is reinforced by paragraph 5.4 which says: “A critical mass of employment floorspace is needed in order that Welborne can provide opportunities for people to live and work on site”.
- 3.27 The second principle has three components:
- Alignment of Welborne’s employment space with the sub-region’s priority sectors (i.e. to reflect the nature of the local economy).
  - Prioritising Portsmouth and Southampton as the major employment centres especially for offices (the “Cities First” approach).
  - Complementing the economic activities at the Solent Enterprise Zone (near Gosport at HMS Daedalus).
- 3.28 Notwithstanding the fact that residents of Welborne may choose to work elsewhere, it is clear that the Local Plan policies for Welborne are intended to strike a balance between the number of homes and the number of jobs. Although the nature of those jobs is to align with the local economy and policies for the cities and the Enterprise Zone, the quantity of jobs at Welborne is intended to relate to the number of additional homes created there.
- 3.29 The desire to encourage office jobs in the two cities does not impinge on development plans for Little Park Farm. Similarly, in terms of complementary roles, the Solent Enterprise Zone further to the south is in a distinctly different sub-market to both Welborne and Little Park Farm which are very close to motorway junctions in the M27 corridor. This is very much reflected in market feedback and the “Business Needs, Site Assessments and Employment Land Study” (2019) upon which we comment later in our report.
- 3.30 The Welborne Plan sets out how a combination of jobs in B-class and non B-class space (Table 5.4 and para 5.14, p.51) could host about 5,700 jobs. This relies on the delivery of 97,520 sq m



of B-class space (Table 5.1 p.50) but, in reality, para 5.11 explains that the future loss of existing employment space to residential use will reduce this figure: “This means that approximately 13,860 sq. m of existing employment floorspace will be lost, resulting in an overall net increase of up to 83,390 sq. m.” This means that the Local Plan needs extra flexibility to make up for this loss of existing floorspace; this adds to the case for Little Park Farm to remain allocated for development.

- 3.31 As already explained above, not all the employment space planned at Welborne is expected to be delivered by 2037. Furthermore, para 5.14 (p.51) of the Welborne Plan warns that the delivery of employment space may take longer than expected and certainty about the number of jobs created is not possible: “It is important to emphasise that these estimates are based on all of the planned floorspace being built and occupied and it may take longer than the plan period to deliver the full quantum of employment floorspace. The actual number of jobs also depends on the final mix of development, the efficiency with which businesses occupy the floorspace and the nature of development of non-B class uses. Consequently certainty about the precise number and type of jobs that will be created at Welborne is not possible at this stage.”
- 3.32 For this reason the Welborne Plan recognises that flexibility is required in Forward Planning and there are dangers in being over prescriptive. Para 5.15 states: “In order to ensure flexibility within the employment areas, this plan will not prescribe exact quantities of each use class to be developed, but give clear guidance about how employment development at Welborne could best achieve the key objectives in paragraph 5.2” (i.e. the objectives of encouraging self-containment and supporting growth that is aligned with the local economy).
- 3.33 In the light of this and given the importance of flexibility when planning ahead for employment land requirements, especially over a Local Plan period to 2037, it seems short sighted to de-allocate Little Park Farm.
- 3.34 Para 5.20 of the Welborne Plan expands upon the “target sectors for the sub-region”. It suggests that employment at Welborne “should complement existing and planned economic development at the Solent Enterprise Zone by focusing on the lighter industrial elements of these sectors, as the Enterprise Zone is more suited in locational terms to the heavier industrial activities”. More pertinent perhaps would be the point that Welborne will be a mixed-use community where some sensitivity about the placement of residential and industrial/warehouse uses is required. Little Park Farm does not have that disadvantage and can be more flexible. Secondly, although the Enterprise Zone might be suited for heavier industrial uses than Welborne, it is not as well

located close to the motorway for industrial or logistics functions. Similarly, Little Park Farm, being close to Junction 9 of the M27 at Segensworth, is much better located than the Enterprise Zone in this respect.

#### Chapter summary

- 3.35 The Fareham Corporate Strategy says the borough is “open for business”. The de-allocation of Little Park Farm would be inconsistent with this principle.
- 3.36 Economic regeneration of the southern part of the Fareham/Gosport peninsula is welcomed but Daedalus is not a substitute for sites at Segensworth. These are separate sub-markets.
- 3.37 The Corporate Strategy includes large scale, mixed-use development at Welborne. Like Little Park Farm there will be a natural interplay with the M27 property market but the number of jobs at Welborne is intended to counterbalance the homes created there. The figures suggest a deficit of 700 jobs during the plan period. The Welborne Plan also envisages the loss of existing employment space (13,860 sq m) in the course of housing development.
- 3.38 By contrast, Little Park Farm could helpfully contribute 150 to 270 jobs based on its current allocation.
- 3.39 The proposed Local Plan endorses the idea of new employment space located in appropriate locations attractive to the market. Little Park Farm is aligned with these criteria and has been judged to be excellent in the employment land evidence, subject only to access improvements now in hand (part and parcel of development).
- 3.40 The plan's 12 Strategic Priorities include objectives for future development with which development of Little Park Farm would be consistent.
- 3.41 The desire to encourage office jobs in the two cities does not impinge on development plans for Little Park Farm.
- 3.42 The Welborne Plan warns that “certainty about the precise number and type of jobs that will be created at Welborne is not possible at this stage”. Little Park Farm has an important role for the council in creating much need flexibility within the proposed Local Plan. Furthermore, Little Park Farm is less sensitive to the proximity of housing than other sites, whilst having better proximity to the M27 than those sites further south.

## 4.0 Supply

- 4.1 We have checked the supply of industrial/warehouse accommodation on the market in the Fareham borough area. According to the CoStar database there is about 25,190 sq m to let at present. This is over 40% lower than the 5 year average reported at the time of the “Business Needs, Site Assessments and Employment Land Study” 2019, by Lambert Smith Hampton (LSH). We analyse this document in more detail later in our report.
- 4.2 Over half of the available space comprises units of less than 5,000 sq ft (465 sq m) in size. Medium and large units are in much shorter supply. There are none currently available in the 25 to 30,000 sq ft category.

Size band (sq ft)	Size band (sq m)	Space to let (sq m)	No. of units	% of units
0 to 5,000	0 to 465	4,147	16	50%
5,001 to 10,000	465 to 929	4,041	7	22%
10,001 to 15,000	929 to 1,394	3,383	3	9%
15,001 to 20,000	1,394 to 1,858	2,949	2	6%
20,001 to 25,000	1,858 to 2,323	1,900	1	3%
25,001 to 30,000	2,323 to 2,787	-	-	0%
30,001 to 35,000	2,787 to 3,252	8,769	3	9%
TOTAL		25,189	32	100%

Source: CoStar property register – industrial/warehouse units to let

- 4.3 Little Park Farm is allocated for 11,200 sq m of B2/B8 floorspace which means it is ideally sized to cover gaps in the market in response to demand.
- 4.4 Lambert Smith Hampton (LSH) has commented on the limited supply of industrial and warehouse property in the “Business Needs, Site Assessments and Employment Land Study” 2019. Paragraph 5.7 states: “Our study highlights that industrial and logistics occupiers looking to expand and relocate have become increasingly frustrated at the lack of availability of prime or good secondary stock along the M27 corridor, both due to heightened demand and the limited supply of new or replacement property coming onto the market. As a consequence, occupiers are out of necessity faced with paying higher rents which in turn justifies viable new development and secures confidence with the financial investors.”
- 4.5 These are strong market signals that point to the need for more B2/B8 floorspace, which Little Park Farm can supply.

- 4.6 In advice to FDL (see copy letter provided), commercial property agent Vail Williams, has said there is “a severe shortage of development sites” in Fareham and along the Solent corridor. Both tenants and owner occupiers find it difficult to find premises and sites.
- 4.7 Vail Williams has questioned the ability of Solent 2 to deliver as much space as is suggested in the proposed Local Plan due to persistent constraints that have hampered development. Like LSH they have also flagged the dependency of supply at Welborne upon major infrastructure whereas, in the meantime, supply at Little Park Farm can come forward in the short term.
- 4.8 Vail Williams’ experience in the south of the borough leads them to note the success of the Daedalus Enterprise Zone but they are firm in the view that the supply there is for a “localised” market.

#### Chapter summary

- 4.9 The supply of industrial/warehouse accommodation on the market is over 40% lower than the 5 year average reported at the time of the “Business Needs, Site Assessments and Employment Land Study” 2019, by Lambert Smith Hampton (LSH).
- 4.10 Size band analysis reveals a particular lack of choice of units above 5,000 sq ft (465 sq m). Little Park Farm offers extra options to cover gaps in the market.
- 4.11 LSH found that industrial and logistics occupiers are frustrated at the lack of availability (this hampers economic growth); although rising rents aid development, they also add cost to occupiers. These are strong “market signals” that favour the creation of more B2/B8 floorspace, which Little Park Farm can supply.
- 4.12 Separate, market-facing advice from Vail Williams records “a severe shortage” of development sites in Fareham and the sub-region, creating difficulty for businesses to find premises and sites.
- 4.13 Vail Williams note that Solent 2 is too constrained to deliver the space set out in the proposed Local Plan and supply at Welborne is a long term proposition, heavily reliant upon major new infrastructure.
- 4.14 Supply at Daedalus is judged to be for a “localised” market, whereas Little Park Farm has broader appeal, greatly aided by its location and the popularity of the surrounding area for business.

## **5.0 Demand**

- 5.1 The LSH report is extremely positive about Segensworth as a business location. They rate the industrial estates in that area highly and paragraph 6.30 says: “The Segensworth estates will continue to thrive throughout the Plan period.”
- 5.2 The LSH report highlights the strength of industrial property demand which is feeding through into rental growth. Para 6.19 states:
- 5.3 “We have seen a marked increase in industrial rents since 2014 post recession, rising from circa £7.25 per sq ft to over £9 per sq ft for prime stock or in excess of this for smaller units – due principally to the acute lack of supply and occupiers recognising that new or better quality modern stock improved the efficiency of their occupation and was worth paying for. We regard this rental tone to be now accepted and evidenced to justify and underwrite new development activity, either pre let or speculative.”
- 5.4 This very much suggests that the prospects for further B2/B8 development, as proposed at Little Park Farm, are good. This helps justify both the planned investment in access improvements as well as the site’s retention as an allocated site.
- 5.5 Market soundings by Vail Williams lead the firm to conclude that Little Park Farm “is viable and attractive to industrial and warehouse occupiers”. They inform us that they have demand from specific companies accounting for around 135,000 sq ft (12,540 sq m) of floorspace plus others accounting for 24 acres (9.7 ha).
- 5.6 Demand is such that these agents are advising companies searching for property in the area to plan up to 2 years ahead “owing to the dearth in supply” and more so for owner occupiers.
- 5.7 Commenting on Daedalus they say that demand there has been “orientated to airport related uses or for small unit development”. The distance from the motorway makes it a separate market and rents are lower. Consistent with this, demand and rents are greater closer to the M27; hence why “Segensworth has become such a popular and well-established business location”. The local labour supply is another positive factor. For these reasons Little Park Farm is attracting local and regional demand.

## Chapter summary

- 5.8 LSH rate the Segensworth employment areas very highly in their assessment. This is also reflected in the scores for Little Park Farm with the exception of access - until improved. They expect the Segensworth estates “to thrive throughout the Plan period.”
- 5.9 Market signals include strong demand and rising rents with better quality, modern stock being perceived as “worth paying for” and “accepted”.
- 5.10 Market consensus confirmed by Vail Williams is that Little Park Farm is viable and attractive for development, underpinned by market interest well in excess of the size of the site.
- 5.11 The strength of demand means companies must plan up to 2 years ahead to acquire space.
- 5.12 Demand at Daedalus is more localised or airport related, evidenced also by lower rents reflecting the distance from the motorway compared to Little Park Farm.



## 6.0 Employment land guidance and SHELAA

6.1 In this chapter we review the employment land evidence underpinning the Local Plan and comment on the methodologies used compared to best practice promoted in the government's Planning Policy Guidance. Documents we refer to include:

- Planning policy guidance (PPG) entitled "Housing and Economic Needs Assessment"
- Planning guidance entitled "Housing and economic land availability assessment" (2014, updated July 2019)
- "Strategic Housing and Employment Land Availability Assessment" (SHELAA) September 2020
- National Planning Policy Framework (NPPF)

6.2 We also comment on the "Business Needs, Site Assessments and Employment Land Study" 2019, by Lambert Smith Hampton (LSH), but the next chapter considers it greater detail.

### Guidance on Housing and Economic Needs Assessment

6.3 Government guidance on "Housing and Economic Needs Assessment" requires local planning authorities to prepare robust evidence on the employment land their areas require. This means understanding existing business needs and keeping them under review to reflect local circumstances and market conditions.

6.4 The guidance also notes (para 25): "Functional economic market areas can overlap several administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area."

6.5 Fareham is part of the Partnership for South Hampshire Area (PfSH, formerly PUSH). Paragraph 6.7 of the Fareham Local Plan 2037 (Reg. 19 publication version) explains that PfSH published a Spatial Position Statement (SPS) in June 2016 "setting out the overall need for and distribution of development in South Hampshire, to 2034". However, the SPS "is now considered to be out of date and needs replacing". Hence, "PfSH is committed to reviewing the study in 2020/21". We understand that the results will be known in Q1 2021, which is after the current consultation

period for the Fareham Local Plan closes in December 2020. This means that the current version of the Local Plan does not have the benefit of this evidence.

- 6.6 It is surprising therefore to read para 3.17 of the Local Plan which says that despite “an obligation to work with neighbouring authorities in order to identify and address unmet need within the region... the Council considers it unnecessary to wait for the outcome of the PfSH work in relation to the question of Fareham’s contribution to unmet need due to two main reasons. First, as has been mentioned the Council is a member of PfSH and as such is party to the discussions and technical assessment undertaken on potential SDOAs within the Borough. Second, the Council has undertaken bilateral conversations with neighbouring authorities through the Duty to Co-operate obligation and is aware of the unmet need arising there and the Borough’s capacity to address any unmet need.”
- 6.7 Although the council is familiar with the workings of PfSh and its other discussions with neighbouring authorities, their new employment and logistics study has not been completed and nor have interested parties had an opportunity to study all the evidence from PfSH before responding to this current consultation.
- 6.8 In the meantime, the council is relying on the “Business Needs, Site Assessments and Employment Land Study” 2019, by Lambert Smith Hampton (LSH). In the absence of the updated report from PfSH this provides only part of the evidence that is required for a proper consideration of the functional economic area of which Fareham is a part.
- 6.9 It is also notable that the government guidance on economic needs assessment recommends detailed work on labour demand (as distinct from extrapolating labour supply) that LSH did not undertake. For example, para 27 of the guidance says that local authorities “need to develop an idea of future needs based on a range of data which is current and robust, such as... sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)”.
- 6.10 Furthermore, the guidance requires councils to plan for alternative economic scenarios: “Authorities will need to take account of longer term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.” Para 29 adds that it is “important” to consider (inter alia) “forecasts (based on future scenarios)”.
- 6.11 This indicates that Local Plans should have sufficient flexibility to accommodate potential change. The need for flexibility is at odds with the notion of deallocating Little Park Farm just prior to its

development which, we understand from Frobisher and their agents, is supported by ready demand. This is a scenario that the council should have anticipated bearing in mind the success of employment sites in the Segensworth area and the strong scores attributed to Little Park Farm in the LSH study with only the exception of access arrangements which the council was aware were being enhanced by Frobisher with a view to development.

6.12 The guidance also sets out other necessary steps. For example, para 30 says: “When translating employment and output forecasts into land requirements, there are 4 key relationships which need to be quantified. This information can be used to inform the assessment of land requirements:

- Standard Industrial Classification sectors to use classes
- Standard Industrial Classification sectors to type of property
- Employment to floorspace (employment density) and
- Floorspace to site area (plot ratios based on industry proxies)”

6.13 The first of these two are associated with employment forecasts broken down by SIC code before conversion to different types of property, bearing in mind that not all jobs within a particular industry are necessarily based in the same type of premises. LSH took a different approach which was to omit SIC based employment demand forecasts linked to use classes and instead they approximated future growth by applying round numbered estimates (either -20%, 0%, 10% or 20%) to the looser industry groupings of labour supply presented on page 61. Although the report displays market feel and contains evidence of supply and past transactions, its approach to labour market forecasting is less sophisticated than other studies.

6.14 It is especially relevant to sites along the M27 (an important logistics corridor) that planning guidance has a particular focus on the need to allocate space for logistics (para 31). The guidance states:

6.15 “The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

- 6.16 Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:
- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
  - analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;
  - analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
  - engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.
- 6.17 Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).
- 6.18 Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of ‘last mile’ facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability.”
- 6.19 Close proximity to motorway junctions and ports add to the necessity for the council to safeguard an allocated site such as Little Park Farm which can provide accommodation for storage and logistics.
- 6.20 The research in progress, commissioned by PfSH (entitled “Economic, Employment and Commercial Needs (including logistics) Study”), is expected to include updated employment forecasts and further analysis of the needs of the logistics sector. We would certainly expect to

see some recognition in the report of growing demand for distribution space as part of the revolution in retailing which has diverted consumer products from shops to warehouses using new supply chains. Plans for the growth of Hampshire's ports (east and west of Fareham) are also likely to add to demand. This adds to the case for the Fareham Local Plan to be more flexible in its approach to employment land and makes the deallocation of a well located site such as Little Park Farm all the more surprising.

6.21 Finally, at para 32, the government guidance answers the question: "How can the specific locational requirements of specialist or new sectors be addressed?" The answer given highlights the importance of: allowing for the needs of different market segments; driving economic prospects; reflecting Local Industrial Strategies; and engaging with businesses and occupiers as part of the economic need assessment work. The guidance is reproduced here:

6.22 "When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities.

These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors."

6.23 Again, this requires that Local Plans recognise sub-markets within their area and have flexibility to accommodate growth. The de-allocation of Little Park Farm runs counter to this approach because it fetters growth and market choice.

6.24 The need for business engagement and business surveys to inform employment land studies is important but lacking in the evidence base. We note that earlier representations from the Hampshire Chamber of Commerce (at Regulation 18 stage) expressed concerns that insufficient employment land and insufficient breadth of choice have been provided. Their comments dated 17 February 2020 include:

- 6.25 “On initial study of the plan there are concerns that no new employment land has been proposed. The plan seems to rely on the existing commercial space allocations at Daedalus and Welborne, which are either heavily restricted in their uses or indeed have not been built. These allocations do not meet requirements of SMEs or general commercial businesses.”
- 6.26 “Other previously allocated employment land around Fareham Station (around 4 Hectares) has now been withdrawn and designated as housing. Proposed housing areas include areas next to the M27 and on previously designated strategic gaps.”
- 6.27 “Transport problems seem to be underplayed. Junction 10, which needs major improvement to access to the proposed Welborne Development, currently has insufficient funding to be constructed.”
- 6.28 The Chamber’s Planning and Transport Business Strategy Group concluded that it “objects to the current plan proposals on the following grounds”:
- “There are no new employment land allocations proposed.
  - The existing employment land allocations at Daedalus and Welborne do not meet the needs for SMEs or general commercial businesses.
  - The plan is too focussed on the provision of housing and compromises existing strategic gaps.
  - The plan should address the issues relating to road infrastructure; its capacity, interactions with existing networks and funding complications.
  - Junction 10 needs to be fully funded and constructed.
  - The plan should strengthen considerably provision for additional sustainable transport services and infrastructure including: bus rapid transit, railway development (including a new station at Knowle Hospital to serve Welborne), as well as more pedestrian links and cycleways. All should take account of the Transforming Cities Fund for the Solent and recent Government announcements on bus services, infrastructure, cycling and general sustainable transport initiatives.”



“Strategic Housing and Employment Land Availability Assessment” (SHELAA) September 2020

- 6.29 The introduction to the SHELAA indicates that it has a forward looking role in examining the “potential” of sites and the “likelihood of development coming forward”. Bearing in mind that the Local Plan runs to 2037, it is clear that both the SHELAA and the Local Plan should be concerned with future possibilities.
- 6.30 Similarly, the government’s Planning Policy Guidance (PPG) entitled “Housing and economic land availability assessment” (2014, updated July 2019) answers the question: “What happens when constraints are identified that impact on the suitability, availability and achievability?” The answer requires that actions to overcome constraints are explored: “Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them.” Arguably the council has been too hasty in suggesting the deallocation of Little Park Farm which is on the cusp of development, not least because access constraints are being overcome.
- 6.31 Para 2.1 of the SHELAA also explains that sites should be assessed with an eye to their potential and the likelihood of development coming forward in future. The SHELAA “provides an assessment of land within Fareham Borough that has the potential for future development by identifying sites, assessing their suitability to provide housing or employment, considering whether such development is achievable on the site and the likelihood of development coming forward.”
- 6.32 The SHELAA continues by referencing a base date “as at August 2020” and a Local Plan period to “2037” – i.e. a time period of 17 years which allows development to come forward on allocated sites even if they have constraints to resolve. This illustrates the inconsistency of de-allocating a site like Little Park Farm in a forward looking plan, especially as it would be prudent to have flexibility for different eventualities and possibilities, including the improvement of access to sites.
- 6.33 The PPG also requires consideration (expressed in positive terms) of how constraints “may be overcome”:
- 6.34 “When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location. For

example, an emerging site allocation may enable development to come forward. This will have to be reflected in the assessment of achievability.”

- 6.35 The PPG continues by suggesting that existing allocations are generally suitable but in any event councils should consider whether circumstances have changed. Change can be positive or negative; we understand from Frobisher that an important change at Little Park Farm is that its development prospects are improving due to demand and as a result of arrangements being put in place to enhance the access. Furthermore, we understand that these “market signals” have been made clear to the council by Frobisher as well as the council’s own consultants (LSH). The PPG states:
- 6.36 “Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.”
- 6.37 Para 3.1 of the SHELAA explains that to accord with the NPPF local planning authorities should have a “clear understanding” of land in their area:
- 6.38 “The requirement to undertake a Strategic Land Availability Assessment for housing and economic, or employment development is contained in the National Planning Policy Framework (NPPF) which was revised in February 2019. The NPPF states that “authorities should have a clear understanding of the land available in their area”.”
- 6.39 This suggests that the council should be open to information regarding the character and status of sites, including the evidence provided by Frobisher regarding their progress with plans to improve the access to Little Park Farm.
- 6.40 Para 3.6 indicates that the council has relied upon the “Business Needs, Site Assessments and Employment Land Study” for intelligence on the need for employment land until 2037. We comment further on this document later in our report.
- 6.41 In terms of the timing of sites, para 4.14 of the SHELAA refers to the glossary to the NPPF stating that “to be considered developable a site should be in a suitable location for development with a reasonable prospect that the site is available and could be viably developed at the point envisaged (achievable)”. However this is a slight misquote because the definition in the NPPF

glossary for “developable” is actually referring to “housing development”. The definition of “deliverable” references a period of five years but, again, this definition is concerned with “sites for housing”. Clearly some sites take longer to develop than others and arguably, for non-residential sites, the length of the plan period is more relevant than the 5 year horizon commonly considered in the context of housing development.

- 6.42 The PPG answers the question: “What factors can be considered when assessing the suitability of sites / broad locations for development?” The answer demands that measures to mitigate constraints are considered:
- 6.43 “A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”
- 6.44 This indicates that proper consideration of the possibilities for overcoming constraints is required. In the case of Little Park Farm we understand that Frobisher has identified solutions for creating an improved form of access but the council has relied upon outdated information, or disregarded new information, regarding the access in coming to the decision to deallocate the site.
- 6.45 The same PPG answers the question, “How should the assessment be reviewed?” It explains that the timing of development may vary between sites and there is clear recognition that development can occur in the short, medium or long term:
- 6.46 “Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be made as to whether sites will come forward as anticipated.” Notably, the SHELAA states (para 4.27) that: “This stage of the review will be completed for the Regulation 19 consultation.”
- 6.47 The PPG specifically addresses, “What happens when constraints are identified that impact on the suitability, availability and achievability?” Again, the guidance is expressed in positive terms and invites a proactive approach that explores solutions: “Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them.”
- 6.48 The PPG states that Stage 5 of the assessment (Final Evidence Base) should include a list of the sites considered and “where these have been discounted, evidence justifying reasons given”. The presence of barriers to development does not necessarily rule out the inclusion of sites, as

indicated by the statement that “where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when”. In other words, even with “barriers to development” a site can be included in a Local Plan and the evidence should examine how constraints might be resolved (not just noted).

- 6.49 Para 4.18 and the table that follows it in the SHELAA identifies “typical constraints that may apply” and “how they might be overcome”. With regards to access constraints, it is stated in the table (page 10) that if a site is land-locked or an access solution “will give rise to a highway safety implication that cannot be mitigated”, it is likely to be discounted. It goes on to say: “Other sites constrained by limited or difficult access point(s) have been considered on their merits. This has included looking at potential solutions to overcome the constraint.” The proposal to de-allocate Little Park Farm would suggest that the council has not yet done this or needs to review FDL’s current information on the topic.

#### Site assessments

- 6.50 Page 237 of the SHELAA lists the following “developable employment sites”:

7. Developable Employment Sites			
LIST OF CONTENTS			
ID:	Site Name:	Gross Site Area (ha):	Ward:
124	Solent Business Park - Solent 2, Sarisbury	9.84	Sarisbury
1168	Land at Rookery Avenue	2.29	Sarisbury
3113	Faraday Business Park, Daedalus East	37.91	Stubbington
3114	Swordfish Business Park, Daedalus West	20.00	Stubbington

- 6.51 The first two, within Sarisbury Ward, are located just to the north of the M27. The second two, within Stubbington Ward, are in the south of the borough close to Gosport. The LSH report (para 5.25) notes the niche that Daedalus occupies in the market is orientated to its airfield - “an important facility as the only hard runway available for general aviation in South Hampshire.”
- 6.52 Page 243 of the SHELAA lists the following “discounted employment sites”:

## 8. Discounted Employment Sites

### LIST OF CONTENTS

ID:	Site Name:	Gross Site Area (ha):	Ward:
20	Standard Way, Wallington	0.59	Fareham East
1365	Land adjoining Fort Wallington Industrial Estate	1.05	Fareham East
3011	Land at Down Barn Farm	32.85	Fareham East
3025	Little Park Farm, Park Gate	5.73	Park Gate
3034	Land rear of WTS, Wallington	1.23	Fareham East
3213	Maindell Pumping Station, Fareham	1.50	Fareham East
3218	Monument Farm	4.69	Fareham East
3225	Lowater Nursery Employment Site, Hook Lane	6.85	Warsash

- 6.53 Six of the eight sites are located within Fareham East Ward; one in Park Gate; and the last within Warsash. The fourth site, Little Park Farm, is the one owned by Frobisher and is the only one in Park Gate ward. The site is allocated for development in the current Local Plan but the stated “reason for discounting” it (page 247) is that it is “contrary to emerging policy for development in the countryside and there is no requirement to allocate additional land to meet employment need”. Our report does not address countryside policies but we note that it is not “additional land” over and above what is currently allocated so there need to be very strong reasons for its deletion; furthermore, we comment on the need for employment land later in our report.
- 6.54 Other information regarding Little Park Farm on page 247 confirms that it is located near to the M27 motorway and adjacent to other development, including the Chandlers Way employment area. These are positive attributes for business use because the site is close to the established and well regarded business areas around Segensworth and accessible to/from Junction 9 of the M27 which is nearby.
- 6.55 Furthermore, the assessment states that the site would be “appropriate for a development with 11,200 m<sup>2</sup> of employment development subject to a full Transport Assessment”. Another positive attribute is “the site’s proximity to Swanwick Station” which, together with a potential “pedestrian/cyclist link” from the west end of the site “should be investigated”. In addition, as the council has been made aware, Frobisher has taken steps to make a number of other helpful improvements to the site’s access. With this information the site should be judged suitable for development; it has already been assessed within the SHELAA as available and achievable.

## Chapter summary

- 6.56 It is necessary for Local Plans to be informed by robust evidence on their local economy and functional economic market areas, consistent with government guidance. Further work, which should be reflected in the Local Plan, is being done by PfSH on its spatial strategy and the area's employment and logistics needs.
- 6.57 Employment land evidence should fully explore employment forecasts (using SIC codes amongst other metrics) and prepare economic scenarios so that Local Plans are appropriately prepared and flexible.
- 6.58 Logistics is highlighted in guidance as an important growth sector to accommodate in planning policy. The importance of this locally is heightened by the connectivity created by the motorway and the role of the local ports and their distribution networks in the economy.
- 6.59 Market feedback (from property agents and the Chamber of Commerce) expresses concern about a lack of choice in the commercial property market, insufficient employment land and the limitations of other sites.
- 6.60 The SHELAA advocates a forward looking, positive and proactive examination of possibilities when exploring site constraints, being alert when circumstances change. De-allocating Little Park Farm because of a constraint that is soluble is inconsistent with this approach.
- 6.61 Even with "barriers to development" a site can be included in a Local Plan and the evidence should examine how constraints might be resolved (not just noted).
- 6.62 The NPPF states that "authorities should have a clear understanding of the land available in their area". The SHELAA says the site would be "appropriate for a development" subject to assessment of transport matters.



## **7.0 Business Needs, Site Assessments and Employment Land Study**

- 7.1 Further employment land evidence and specific references to Little Park Farm are to be found in the “Business Needs, Site Assessments and Employment Land Study”.

### Study brief and objectives

- 7.2 Paragraph 1.3 explains that the report examines the suitability of the borough’s employment premises and sites, assessing them with a market perspective and concluding which sites are “most unlikely to be brought forward for future employment use”. However, even if a site in a list is the least likely to come forward it does not necessarily follow that it is “most unlikely” to come forward. In any event, Little Park Farm is not in the lowest category of six used, nor is it described in the report as being unlikely to come forward. To the contrary, it is described in very positive terms even though its score was affected by the need to improve the access, which is now in hand with a view to the site’s development and use as intended by its existing allocation.
- 7.3 It is important to note that the report is subject to a number of caveats. For example the bullet points at paragraph 1.8 indicate that whilst the report provides market information it “is not to prescribe any formal recommendations or pre-empt Council decisions”. It also notes that during the Local Plan forecasting period there will be economic fluctuations plus political and unforeseen influences. This makes it especially important for the Local Plan to have some flexibility. Deleting Little Park Farm as an allocation would remove flexibility.
- 7.4 Furthermore, the report warns (second bullet point) that “site circumstances, planning assumptions, land ownership, property values etc. are liable to change”. Clearly this is the case at Little Park Farm where arrangements are being made to improve the access as intended.
- 7.5 Similarly, the third bullet point encourages new development opportunities stating: “The reference to existing or potential employment sites and buildings in the report does not preclude them from being developed for other purposes and clearly any planning application would be judged on its own merits. Whilst we have provided a comprehensive assessment, it is recognised and encouraged that new, and hitherto unrevealed, employment site opportunities will continue to come forward.”
- 7.6 Paragraph 1.9 notes the importance of, inter alia, “discussions with developers” and “information on infrastructure constraints to employment developments”. We understand that Frobisher Developments Ltd briefed LSH (the authors of the study), who in turn briefed the council,

regarding news on how the infrastructure constraints at Little Park Farm are being addressed to good effect. To be consistent with Planning Guidance and the intentions of the Local Plan we would expect these matters and the progress being made to be given full and continuing consideration by the council, keeping upon the possibility of developing Little Park Farm as intended by existing policy.

#### Methodology and planning policy framework

- 7.7 Continued flexibility is important given the length of the Local Plan period. Paragraph 2.6 repeats the point that the economy fluctuates, which means that flexibility is important. This is clear from the statement that “projections of demand and take-up and reallocation of use will no doubt require re-assessment during the period of the Local Spatial Plan”.
- 7.8 The need for flexibility is further emphasised in paragraph 2.7 which states that in order for Fareham to realise its ambitions there needs to be “a market focussed development strategy and adaptability in land use allocation (flexibility in planning determinations are vital to respond to occupier needs)”.
- 7.9 Changes to the planning system, including Permitted Development Rights, increase the need for flexibility. The report states (para 2.8): “There has been and continues to be, a significant transition in land use re-allocation within the Borough and where retail and housing development has already or may supercede B class land use, an objective judgement will be required to recommend safeguarding employment sites in the future (for existing, allocated or potential site opportunities).” Under these circumstances the deallocation of a site adversely affects the council’s flexibility.
- 7.10 This point about flexibility is amplified by the sub-regional role expected of sites along the M27 corridor. The report notes the dynamic and complex nature of employment land demand; this is an important part of the market context to which Fareham is expected to respond:
- 7.11 “2.9 The changing nature of occupier’s property requirements and the dynamics of how Fareham relates to its neighbouring sub-regional market place, are inevitably complex and will continue to be in a state of flux over the coming years due to the impact of major projected land releases and take up of development opportunities in the South Hampshire region.”
- 7.12 “2.10 Nevertheless, it is important to consider the wider picture as to how the land supply and perceived demand will be influenced in a sub-regional context, especially in relation to the

ambitions of the PUSH and Solent LEP based strategic policies. Fareham Borough is midway along the M27 corridor and accordingly benefits from the communication links and divided labour pool from both the Southampton and Portsmouth conurbations, but conversely its land supply and resident workforce is subjected to strong competition.”

- 7.13 The report echoes the NPPF, reminding readers of the government’s overarching policies including the need “to help build a strong, responsive and competitive economy”. Furthermore, paragraph 11 of the NPPF requires a positive approach to meeting development needs. With flexibility to adapt and the ability “as a minimum” to meet objectively assessed needs. This suggests that the council need not hamper its flexibility, nor that of the local economy, by deallocating a site that is attracting market interest and investment as intended by its current allocation.

#### South Hampshire market overview

- 7.14 Section 3.0 of the report provides an overview of the South Hampshire commercial property market. Much is said about the relatively robust nature of demand generally exceeding supply. For example, paragraph 3.2 references “sustained growth in occupier demand” and “an increase in headline rents and falling tenant’s incentives”.
- 7.15 The industrial and logistics sector is noted to be an important growth sector. Flexibility is required to cater for its growth. Paragraph 3.3 confirms this and also notes the focus of the Enterprise Zone on specific company types rather than the market at large (an advantage of Little Park Farm is that it does not have restrictions of this nature):
- 7.16 “3.3 This take up, combined with a lack of development, has seen availability reach an all-time low, and especially in key motorway locations this shortage will increasingly frustrate business expansion and relocation. In turn this has placed pressure on the available stock of employment sites, and whilst say Welborne in the Borough will present a significant contribution over time, the immediate supply of land is severely restricted. The opportunity for occupiers to acquire new premises at the Solent Enterprise Zone Daedalus East is proving reasonably successful and interest and take up here has been predominantly by local businesses relocating to retain staff, even though it is some distance from the motorway – one determining factor here is that the planning conditions insist on occupiers be involved in aviation, marine or advanced technology/engineering industries.”

7.17 Confirmation of the industrial market being constrained due to demand exceeding supply is confirmed on pages 16/17 of the report. For example:

- “strong and steady demand has been hampered by the critical lack of built supply which has impacted across all size ranges”
- “shortage of good quality, modern, detached industrial and logistics units, as a negligible amount of development had taken place over the last 5 to 10 years”
- “demand has virtually outstripped the supply of both prime and modern secondary units in the region across most unit size ranges”
- “occupiers struggled to identify suitable premises to move to and this will continue until the construction and take up of new development schemes are completed”
- “the opportunity for businesses to expand has been restricted, particularly in terms of small freehold unit schemes in good, strategic locations or low density type users requiring open storage land, transport depots etc.”
- “take-up of pre-let opportunities by larger companies should in theory release a stock of buildings into the market which will help soak up this latent demand but will not be adequate to satisfy the overall quantity of occupier requirements”

7.18 The tightness of supply is also seen in the (para 3.9) “shortage of secondary and tertiary grade stock in the market” which “is restricting the availability of second hand premises to incoming occupiers”.

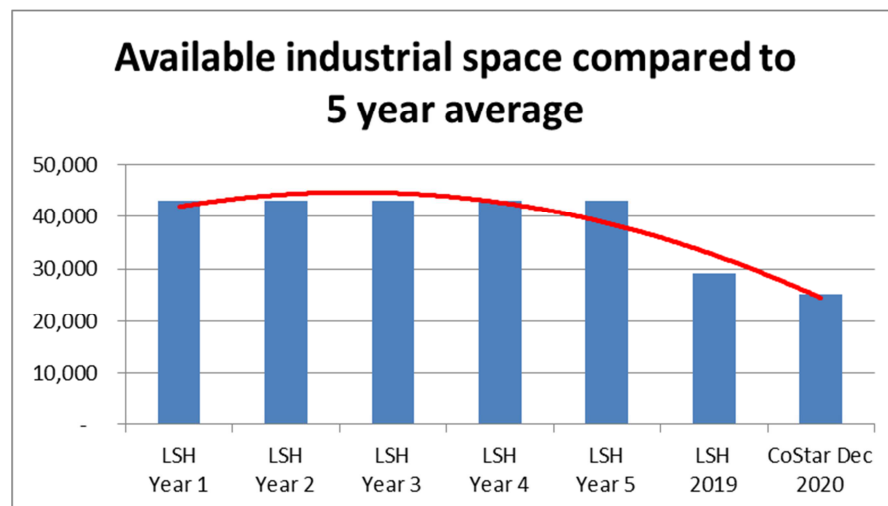
7.19 Paragraph 3.14 (p.18) again signals the need for flexibility in forward planning due to potential changes of use for which there is also growing interest, greater planning freedoms and legitimate demand:

7.20 “In certain locations (generally where there is a non-conforming use or in a mixed use area on the fringe of commercial activity) the existing older stock with an established industrial use, will increasingly be under pressure to be redeveloped for residential or alternative employment uses, as higher land values will almost certainly be more attractive to the freehold owner/developer. This tension between the delivery of housing growth targets in the PUSH region and at the same time safeguarding employment space, must be carefully adjudicated and each individual site evaluated on its own merits.”

- 7.21 The need to accommodate potential changes of use, including through Permitted Development and the flexibilities afforded by the new Class E, make it all the more important that the Local Plan has built-in flexibility. This is not achieved by deallocating Little Park Farm.
- 7.22 The industrial market is segmented in subtle ways that mean an overall quantity of supply does not satisfy all requirements. This is highlighted by paragraph 3.16 which explains that even “prime space in a local context... would not conform to the property industry’s definition of Grade A industrial space” and specialist space for logistics may be ill suited to many B2 purposes. An advantage of Little Park Farm, as an allocated site awaiting development, is that space can be specified and built to match specific demand at the time.
- 7.23 Looking five years ahead, the report says (para 3.22) that it is “unlikely” that the level of stock being released into the market from development activity will be sufficient to meet demand. Looking beyond that is difficult without finer grain employment forecasts than those used in this report. For both reasons (concern about the sufficiency of stock and the uncertainties of forecasting) make it all the more important that the Local Plan retains its land allocations.
- 7.24 There are also differences within supply by tenure. Not only is there evidence of rental growth but also in freehold values. Paragraph 3.31 says: “Freehold properties remain in hot demand and we anticipate that capital values will continue to increase across all size ranges and locations in 2018, as owner-occupiers, in particular, search for their own properties, rather than paying increasing rents.”
- 7.25 The authors also report (para 3.33) that businesses are frustrated by a lack of freehold units: “We are aware that many small businesses, given the opportunity, would prefer to buy and invest in their own premises.” This underlying anxiety about lack of choice is also to be seen in the investment market (para 3.34):
- 7.26 “The investment market along the South Coast continues to be ‘hot property’, with consistent levels of competition seen for all product types. Prime industrial yields now stand at approximately 4.5%. With opportunities in the region being far and few between and investors attracted to the strong occupational market dynamics, the outlook over the coming year is set to continue positively with strong demand and little product available.”
- 7.27 This adds further weight to the case for retaining Little Park Farm as an allocation, especially as the owners indicate that the access is to be improved.

## Fareham Borough overview

- 7.28 Paragraph 4.2 confirms that the market responds positively to the provision of new floorspace and local demand is supplemented by “business occupiers from outside the local area”.
- 7.29 Paragraph 4.3 is a reminder that the Segensworth area has proven to be “attractive to companies who could either move to new ready built accommodation or build to their own specific criteria, to satisfy their business space requirements and aspirations”. Furthermore, notwithstanding the current access to Little Park Farm, it is due to be improved which will be a helpful step towards having “well accessed and serviced land for development” which para 4.3 describes as “vital”.
- 7.30 The report also highlights (para 4.6) a downward trend in the availability of industrial space. It states: “The overall quantum of industrial stock in the Borough has decreased over the past 5 years with marginally more B1c/B2 floorspace occupied than for B8 use. This is due to a combination of higher take up rates and lack of replacement stock or new development activity.”
- 7.31 The amount of built industrial/warehouse floorspace stated to be available on the market in Fareham at the time of the report was approximately 29,030 sq m compared to a 5 year average of 42,969 sq m. They described this reduced level of supply as “a very low level of standing stock”. The difference compared to average was a drop of almost a third (-32%).
- 7.32 According to our research in December 2020, using the CoStar commercial property register, availability has continued to fall to a new low - a change of -41% compared to average. This downward trend, which has accelerated since publication of the LSH report is illustrated in the following graph:





- 7.33 This is consistent with the warnings in the report that the choice of industrial space is limited with a tendency for demand to exceed supply. The trend line further signals the need for Fareham to retain allocated land, supporting choice and flexibility, rather than to give it up.
- 7.34 Close scrutiny of choice by LSH, which concluded that it was "very low", also found that availability was "distorted by the availability of two units of over 6,503 sq m (70 000 sq ft)". This is consistent with our own analysis (shown earlier) in finding relatively few units of a given size on the market.
- 7.35 LSH comment that there is a pipeline of new development "predominantly at Daedalus and Welborne". As observed by us and others, Daedalus is a separate submarket of the Gosport peninsula which caters for local and niche demand; Welborne is dependent on delivery of significant infrastructure and policy seeks to balance the number of jobs there with the number of new homes (with an acknowledged risk in the council's evidence that the number of homes delivered will run ahead of the number of jobs).
- 7.36 LSH advises in para 4.7 that when compared to the average take-up rate (25,000 sq m pa), the supply of available space "is less than 14 months" and: "If one excluded the two much larger units, the current availability would correspond to only 7 months' supply."
- 7.37 It is evident from paragraph 8.6 that LSH is circumspect about former ambitions in the PUSH Spatial Position Statement (June 2016) for growth in the number of office jobs in particular. This may explain why Paragraph 4.8 shows that LSH departed from the methodology (recommended in guidance and commonly used by others) of estimating future floorspace requirements based on employment demand forecasts> These are often broken down into 38 or 45 SIC sectors using sophisticated models from Oxford Economics, Cambridge Econometrics and others to satisfy Planning Guidance. Instead LSH sets aside the work of PUSH and Solent LEP stating:
- 7.38 "We understand that to achieve the economic growth targets asserted by the Solent LEP, this will require new jobs and in turn the provision of additional B class employment space. The key question is whether the floorspace projections are realistic and if so, is there sufficient employment land available and suitably attractive to the market to accommodate this need."
- 7.39 Notably the report does consider Little Park Farm to be attractive to the market, subject only to improving the access.

## Employment land supply and demand

- 7.40 LSH looked at the quality of the built stock and para 5.1 emphasises the importance of there being new space of good quality: “Therefore continual refreshment and replacement of the available employment space is essential to match market churn and satisfy the demands of business occupiers”. Little Park Farm can help meet this requirement for new space.
- 7.41 The importance of flexibility to sustain a pipeline of stock is stressed in para 5.3 which says the “Local Plan must be continually reviewed and reappraised to react to future market trends, site opportunities and allocations”. The new access arrangements at Little Park Farm represent one such opportunity.
- 7.42 Even sites with poor access can have excellent prospects and perceptions can change in their favour. Paras 5.4 and 5.5 illustrate this in references to Welborne:
- 7.43 Welborne has (para 5.4) “remained dormant over many years and has therefore been disregarded by potential occupiers or prospective developers. This is principally due to the fact the site has compromised motorway access and infrastructure limitations which require significant public sector investment to upgrade Junction 10”.
- 7.44 “5.5 To change this mindset and market perception, evidence of infrastructure works commencing and physical activity on site, will be required together with a structured and concerted marketing campaign.”
- 7.45 Ample endorsement of B2/B8 demand is provided by the LSH report. For example:
- 5.7 – “occupiers... increasingly frustrated at the lack of availability of prime or good secondary stock along the M27 corridor”
  - 5.10 – “The advent and demand curve of e commerce logistics requires a greater recognition and understanding, as this sector will inevitably continue to grow.”
  - 5.12 – “We have witnessed significant activity in home delivery requirements across the Region, with companies such as Amazon, DPD Logistics, AO.com recently acquiring distribution depots and with the boom of on line retailing and new housing, the demand in this sector will only increase (particularly in well accessed motorway locations).”
- 7.46 In contrast, the report notes (para 5.25) that the sites at Daedalus are geared more to the aviation sector due to the presence of the runway. Hence, to a significant extent, they are

complementary rather than competing with Little Park Farm. Furthermore, the potential to deliver 73,000 sq m at Faraday (para 5.27) and 34,000 sq m at Swordfish (5.30) is described in each case as being “over the Plan period”. This means a period of 17 years during which it could well be helpful to have the flexibility to provide B2/B8 space closer to the M27 at Little Park Farm.

- 7.47 Paragraph 5.11 makes an important point about the breadth of industrial/warehouse demand and its employment content. Flexibility is called for in response to the statement: “there is a distinct difference between occupation for warehouse and logistics property (B8), light industrial space (B1c) and general industrial (B2). Whilst there is clear definition for certain operations, in practice, many businesses cross over the planning boundaries and occupy space for combined manufacturing and assembly, material and finished goods storage, distribution and often a variable office content.”
- 7.48 Furthermore, although much of the employment land evidence mentions B1a, B2 and B8 uses, there is less explicitly said about B1c and the fact that it has a lower average employment density (47 sq m NIA per job) compared to B2 at 36 sq m (GIA) per job. This means that some users of industrial space will host fewer jobs per sq m than the evidence assumes. This is another reason to be cautious about losing flexibility and employment space.

#### Occupier needs and future predictions

- 7.49 Section 6.0 of the LSH report is focused on occupier needs and future predictions
- 7.50 Paragraph 6.10 comments on investor/developer interest being stronger for B2/B8 than B1a: “Our market research and commentary demonstrates the strong investor/developer demand currently for B2/B8 uses along the Solent corridor, where there is greater confidence in its viability and return. This is in contrast to the traditional B1a office market, where occupier rationalisation is occurring and there is a pre dominance of flexible serviced/enterprise business centres which are more attractive to the business community.” This highlights the importance of B2/B8 development compared to B1a as a means of providing additional employment. Given that B2/B8 requires more floorspace per job than B1a, it is especially important to retain employment generating sites like Little Park Farm.
- 7.51 Paragraph 6.20 explains that LSH has used three different methodologies in order to consider employment needs and forecasts during the Plan period. These are:

- Page 61 – approximations of growth/decline in the existing labour supply suggested for high level categories of industry between 2018 and 2036. Para 6.22 says this was “a qualitative exercise”.
- Page 62 – reference to average completion rates for new B1a and B2/B8 space.
- Page 63 – a combination of historic take-up rates, plus a chance to “reflect” on employment modelling by PUSH, plus “our market judgement” of demand and supply. The table at para 6.25 shows numerical outcomes but not how the calculations work; this makes the method opaque and hard to audit.

7.52 Paragraph 6.29 trailed the upcoming Local Industrial Strategy (LIS), noting the objectives of productivity gains and job creation. Furthermore, whilst LSH expected the LIS to endorse the importance of the marine and maritime industry, “other significant employment clusters such as aviation, contact lens, logistics/supply chain etc should not be overlooked nor underestimated in employment terms”.

7.53 Paragraph 6.30 repeats the potential role of key sites but with some qualification. For example, Welborne’s jobs are subject to the new motorway junction becoming operational; road access to Daedalus has been an “inhibitive factor” but may improve; meanwhile the Segensworth estates “will continue to thrive”.

#### Site Assessment Analysis

7.54 Chapter 7.0, commencing on p.66, provides an assessment of employment areas and sites using five grades (A to E). The Table at paragraph 7.9 (p.70) comments specifically that Little Park Farm is “excellent” for its location and potential.

7.55 Although the report references “access constraints” the owner of the site says these are being overcome and should not be taken as permanent. In which case, armed with this knowledge, the property would score highly in all respects. The site’s development prospects continue to improve due to the access proposals and the suitability of the site is therefore getting stronger not weaker.

7.56 Favourable comparisons can also be made with adjoining sites due to the strengths of Segensworth. For example, in Appendix 1, the proforma for Segensworth West Industrial Estate (Site Ref. 80) next door to Little Park Farm is graded “A”, being “conveniently located adjacent to

the M27 at Junction 9 and whilst lacks local amenities and public transport is a popular business location”.

- 7.57 Similarly, Park Gate Centre & North (Site Ref. 81), also nearby, site scores well in terms of its “strategic location, the local amenities on offer and its public transport links”. Helpfully Little Park Farm occupies a nearby site that is not especially sensitive for housing estates or the countryside due to the close proximity of the motorway and the railway line.
- 7.58 Furthermore, Little Park Farm offers helpful capacity for expansion given that nearby properties (e.g. Park Gate Business Centre, Site Ref. 82) are critiqued for having “limited room for expansion given the proximity of the railway and motorway, although land to the east is allocated for employment uses (Little Park Farm, site 123).” (The proforma for Little Park Farm has the Site Ref.3025.)
- 7.59 Park Gate Business Centre scores well for its use despite the railway and motorway – “The site is well suited to this use; flanked by both a railway line and M27 motorway”. Furthermore: “The site offers little scope for further intensification or expansion”... but Little Park Farm can help by providing extra land.
- 7.60 It is acknowledged that access to Little Park Farm can be improved. Its proforma (Site Ref. 3025) notes the weakness of the status quo but points at potential solutions like traffic signals; access improvements “would significantly improve its marketability and given its location [it] would be a suitable employment site”.
- 7.61 The proforma states that Little Park Farm has “no neighbour constraints”. The recommendation is: “The location of the site and the surrounding uses makes this site a viable employment site with further scope for development; however the access constraints are currently limiting further expansion of this site.” The site is scored “D” (not “E”) based on the status quo pending realisation of its potential – i.e. the score was not terminal and should not, under the circumstances, trigger de-allocation.
- 7.62 The two summary pages in Appendix 3 show that the Segensworth sites are amongst the best. There is no reason what the score for Little Park Farm should not improve by a significant margin now that the access is being improved.

## Conclusions by LSH

- 7.63 Section 8.0 sets out the conclusions of the “Business Needs, Site Assessments and Employment Land Study”.
- 7.64 In paragraphs 8.1, LSH warns of the need to periodically review the balance of homes and employment and the pace at which they are delivered “to ensure that one does not have precedence over the other”. As already noted, there are already doubts that Welborne can deliver as many jobs as homes in the plan period. This supports our proposition that the Local Plan should have more flexibility and that the deallocation of Little Park Farm would be a mistake.
- 7.65 Paragraph 8.2 says that “all potential employment sites should be retained in the emerging Local Plan”.
- 7.66 The same paragraph goes further still in saying: “Moreover with the evident delay in delivery of the major employment sites in the short to medium term, one could advocate that certain identified housing sites should be re assessed and utilised for B class development instead (or in tandem as mixed use schemes).” Given the pressure to deliver more housing, this conclusion that housing sites should be given up for employment is yet another reason not to deallocate Little Park Farm.
- 7.67 Paragraph 8.3 also indicates the need for flexibility, not least because “site specific circumstances change as they invariably do and potential new development options arise”. The enhancement of the access at Little Park Farm is one such example and it is not logical to deallocate the site on the cusp of development.
- 7.68 The report advises (para 8.5) that “it is far preferable to have a surplus of employment land in the Local Plan, wherever possible, in order to enhance the choice and variation to developers and occupiers”. As already noted, much of the market commentary in the report reveals that demand exceeds supply (particularly for B2/B8 sites), generating rental growth and supporting the statement for Fareham that “arguably supply creates and attracts demand”. This also illustrates one of the deficiencies of “take-up” as a measure of demand compared to employment forecasts because take-up cannot occur without supply.
- 7.69 As noted above, paragraph 8.6 shows LSH is less convinced about growth in the number of office jobs in particular. The target of 55,000 sq m of B1a in the PUSH Spatial Position Statement (June 2016) contrasts with the lower figure from LSH on page 61 of 26,400 sq m. But in the case



of B2/B8 the difference is reversed – the equivalent figures are 64,000 to 75,000 sq m (from PUSH) compared to the higher figure of 127,200 sq m (from LSH). This would suggest that the Local Plan should be especially careful to safeguard B2/B8 sites compared to B1a sites. Again, this supports the proposition that Little Park Farm should be retained.

- 7.70 LSH goes further still in recommending that new tracts of development land for employment are found, over and above Daedalus and Welborne. Paragraph 8.8 states:
- 7.71 “Over time, Daedalus and Welborne will deliver new floorspace, however we suggest there is a need to identify new tracts of land, hitherto undiscovered, with potential to offer B Class use development during the Plan period, critically over the next 5 years or so and to provide genuine competition to alternative employment sites in other parts of the Solent region.”
- 7.72 Furthermore (para 8.9): “The economic importance of B8 logistics and supply chain activity should not be under estimated. This is particularly relevant to the Borough having direct access to the M27 with three motorway junctions and its proximity to Southampton Docks and Portsmouth International Ferryport. This sector is vital in supporting manufacturing activity and servicing the broader Solent economy, such as the cruise ship industry and the ever increasing demands of e tailing/ internet deliveries. In practice we contend that B8 designated occupiers do not necessarily generate lower job densities than a B2 user, nor infer lesser GVA productivity (as in many instances, B8 can provide a greater employee density if associated with a high office content).”
- 7.73 So the report is giving especially strong endorsement to the type of use (B2/B8) for which Little Park Farm is currently allocated. The northern part of the borough is also singled out as a good location for another enterprise/innovation centre to complement the one at Daedalus. Paragraph 8.10 states:
- 7.74 “We advocate the Council promote and support further investigation into development of a new enterprise/innovation centre, similar to the successful Daedalus model, further north within the Borough closer to the motorway or Town Centre, to encourage and stimulate entrepreneurial activity.”
- 7.75 This confirms that the two locations are seen as complementary rather than competing. Vail Williams has also indicated to Frobisher Developments Ltd that whilst the success of Daedalus is to be welcomed, it is not to the detriment of demand at Segensworth, hence there’s no logic in the deallocation of Little Park Farm.

7.76 The last paragraph of the report (8.11) and the table on page 73 signal a mathematical excess of employment land supply but this calculation belies the advice above about the pressure points in the market, the need for greater flexibility and the reliance of particular sites on infrastructure or assumptions.

7.77 The proposed Local Plan 2037 makes some adjustments to the figures in the LSH study due to the passage of time and other updates. However it should also recognise the following factors:

- Welborne
  - As noted above, the consequence of the altered figure means that the development is likely to undershoot its own employment targets during the Local Plan by almost 700 jobs.
  - The table on p.69 of the LSH study also indicates that the “possible timescale” for development starts 5 years later than for Little Park Farm which it recognises could start now.
  - Graphs in Appendix 5 highlight significant population growth in the borough from 2017 to 2037. This adds to the need for employment land, especially if the borough is to achieve a greater level of self-containment as set out in the council’s Corporate Strategy and within planning policy.
- Faraday Business Park, Daedalus (Policy E2)
  - Table 6.3 and the top of page 149 of the Local Plan suggest there is capacity of 65,100 sq m but the text includes non B-class uses: “Proposals shall contribute towards the delivery of a minimum of 65,100 sq.m of employment floorspace and ancillary uses including R&D, convenience, childcare and education and training of pilots”. Not only does this mean that less B-class space may be delivered, it also includes space for “niche” uses not applicable to the general market.
  - Furthermore, monitoring data from Hampshire County Council tells us that the development is “Part Complete”, leaving 13,900 sq m available for pipeline supply.
  - Pages 149/150 also list some potential constraints to take into account (possibly adding extra time or cost) related to, for example, Solent Airport, high quality

design, “Brent Geese and Waders” and possible consultation with Historic England.

- The table on p.69 of the LSH study indicates that the “possible timescale” for development is protracted, through to 2036, whereas Little Park Farm could be completed in the period to 2025. It is important to recognise the role that Little Park Farm can play within the early stages of the Local Plan when other sites cannot.
- A helpful map in Appendix 5 shows the different parts of the borough in relation to the M27. Little Park Farm and Segensworth are by the M27 near the annotation for Park Gate. Daedalus is further south near the annotation for Lee-on-Solent. These are separate sub-markets.
- Swordfish Business Park, Daedalus (Policy E3)
  - Table 6.3 and the top of page 151 of the Local Plan differ in the amount of floorspace capacity available by 700 sq m. Furthermore, like Faraday, the text includes non B-class uses: “Proposals shall contribute towards the delivery of 12,100 sq m of employment floorspace and ancillary uses including R&D, convenience, childcare and education and training of pilots”. Not only does this mean that less B-class space may be delivered, it also includes space for “niche” uses not applicable to the general market.
  - Like Faraday, pages 151/152 list potential constraints to take into account (possibly adding extra time or cost) related to, for example, Solent Airport, high quality design, “Brent Geese and Waders” and possible consultation with Historic England.
  - As above, the table on p.69 of the LSH study indicates that the “possible timescale” for development is protracted, through to 2036, whereas Little Park Farm could be completed in the period to 2025. It is important to recognise the role that Little Park Farm can play within the early stages of the Local Plan when other sites cannot.

- Solent 2 (Policy E4)
  - Paragraph 6.23 of the Local Plan 2037 (p.155) states: “Planning permission was granted in 2008 for 23,500 sq m of office floorspace, which has yet to be built out, however the permission remains extant and the site is undergoing renewed marketing and promotion for office uses. The Business Needs, Site Assessments and Employment Land Study identifies the site as a commercially attractive site for the proposed Office or Industrial uses 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.”
  - Several points arise from this statement. Firstly, we understand that FDL has had close involvement with the site in the past, including examining and testing potential development scenarios. They concluded that even disregarding environmental/ecological and water main constraints the site might yield circa 18,500 sq m but, more realistically in the light of these issues would yield only 13,170 sq m. This is a shortfall of up to 10,330 sq m compared to the figure of 23,500 sq m relied upon in the proposed Local Plan.
  - So the consent is historic, development has not been forthcoming and there are doubts about what can be delivered and when. The table on p.69 of the LSH study indicates a longer potential timescale (to 2029) compared to Little Park Farm which it recognises could start now (through to 2025).
  - The text of the Local Plan suggests a preference for office use. It is therefore in a separate part of the market to Little Park Farm.

7.78 The uncertainties associated with these sites are not apparent from Table 6.3, upon which the proposed Local Plan relies. Hence it would be prudent to have more flexibility in the Local Plan and to recognise that the prospects of development occurring at Little Park Farm are increasing. Employment generating floorspace can be delivered in the short term due to the access improvements being made and ready demand from businesses to locate at Segensworth.

#### Chapter summary

7.79 Further employment land evidence and specific references to Little Park Farm are to be found in the “Business Needs, Site Assessments and Employment Land Study” by LSH.

- 7.80 Little Park Farm is not in the lowest category of six used, nor is it described in the report as being unlikely to come forward; nor is it recommended for de-allocation. To the contrary, it is described as “excellent” even though its score was affected by the need to improve the access, which is now in hand. (The report advises that site circumstances are “liable to change”.)
- 7.81 Changes to the planning system, including Permitted Development Rights, increase the need for flexibility. The study notes the dynamic and complex nature of employment land demand in the borough and nearby.
- 7.82 It also notes the NPPF’s call for policies “to help build a strong, responsive and competitive economy”.
- 7.83 South Hampshire has a relatively robust industrial property market; the report cites demand exceeding supply. Limited choice, rising rents and “sustained growth in occupier demand” are symptoms of this.
- 7.84 The market is segmented and prospective sites are not without their problems or delays or they focus on a niche. Hence, like a strong business with a cashflow problem, this means that the sum of supply does not necessarily satisfy demand when and where required. The retention of Little Park Farm as an allocation would add flexibility and help the supply side of the equation.
- 7.85 The LSH study detects a downward trend in the supply of available space on the market – down a third compared to the 5 year average to “a very low level of standing stock”. Our research shows the change has accelerated to minus 41% compared to the average.
- 7.86 Site assessments indicate the Segensworth estates “will continue to thrive”. Little Park Farm can also address the inability of the local estates to expand.
- 7.87 Conclusions by LSH include “all potential employment sites should be retained in the emerging Local Plan”; the need to balance homes and jobs, even to the extent that “one could advocate that certain identified housing sites should be re assessed and utilised for B class development instead (or in tandem as mixed use schemes)”.
- 7.88 Furthermore, it is “far preferable to have a surplus of employment land in the Local Plan” not least for choice and because the nature of the market (especially for industrial and logistics space) means that supply is met by demand.
- 7.89 Site specific factors include:

- Welborne – likely shortfall of circa 700 jobs during the Local Plan period. Little Park Farm can deliver sooner.
- Faraday (Daedalus) – in reality Policy E2 includes non B-class space and “niche” space. HCC monitoring suggests it is already “Part Complete” meaning there is less than stated for the future pipeline. The evidence suggests a protracted rate of delivery up to 2036.
- Swordfish (Daedalus) – the Local Plan uses two figures differing by 700 sq m. Like Faraday, the space includes non B-class and “niche” uses; it also has a long term timescale.
- Solent 2 (Policy E4) – the estimated floorspace yield of 23,500 sq m of offices is historic (2008); FDL says from close knowledge of the site that this is potentially overstated by 10,330 sq m due to challenging constraints; it has not been delivered in many years and its prospects are in doubt. The plan expresses a preference for B1a use, so it is in a separate market compared to Little Park Farm (B2/B8).

7.90 The uncertainties associated with these sites are not apparent from Table 6.3, upon which the proposed Local Plan relies. Meanwhile, the development prospects of Little Park Farm are increasingly certain.

7.91 We have studied the LSH report at length. Nothing gainsays the suitability of Little Park Farm for development as intended by the existing allocation, even though the access is signalled as needing improvement. Although the council has suggested the site should be deallocated, this is not a recommendation to be found in the “Business Needs, Site Assessments and Employment Land Study”.



## **8.0 Summary and conclusions**

8.1 Text for this chapter is carried forward from our chapter summaries as follows.

### Policy context

- 8.2 The Fareham Corporate Strategy says the borough is “open for business”. The de-allocation of Little Park Farm would be inconsistent with this principle.
- 8.3 Economic regeneration of the southern part of the Fareham/Gosport peninsula is welcomed but Daedalus is not a substitute for sites at Segensworth. These are separate sub-markets.
- 8.4 The Corporate Strategy includes large scale, mixed-use development at Welborne. Like Little Park Farm there will be a natural interplay with the M27 property market but the number of jobs at Welborne is intended to counterbalance the homes created there. The figures suggest a deficit of 700 jobs during the plan period. The Welborne Plan also envisages the loss of existing employment space (13,860 sq m) in the course of housing development.
- 8.5 By contrast, Little Park Farm could helpfully contribute 150 to 270 jobs based on its current allocation.
- 8.6 The proposed Local Plan endorses the idea of new employment space located in appropriate locations attractive to the market. Little Park Farm is aligned with these criteria and has been judged to be excellent in the employment land evidence, subject only to access improvements now in hand (part and parcel of development).
- 8.7 The plan's 12 Strategic Priorities include objectives for future development with which development of Little Park Farm would be consistent.
- 8.8 The desire to encourage office jobs in the two cities does not impinge on development plans for Little Park Farm.
- 8.9 The Welborne Plan warns that “certainty about the precise number and type of jobs that will be created at Welborne is not possible at this stage”. Little Park Farm has an important role for the council in creating much need flexibility within the proposed Local Plan. Furthermore, Little Park Farm is less sensitive to the proximity of housing than other sites, whilst having better proximity to the M27 than those sites further south.

## Supply

- 8.10 The supply of industrial/warehouse accommodation on the market is over 40% lower than the 5 year average reported at the time of the “Business Needs, Site Assessments and Employment Land Study” 2019, by Lambert Smith Hampton (LSH).
- 8.11 Size band analysis reveals a particular lack of choice of units above 5,000 sq ft (465 sq m). Little Park Farm offers extra options to cover gaps in the market.
- 8.12 LSH found that industrial and logistics occupiers are frustrated at the lack of availability (this hampers economic growth); although rising rents aid development, they also add cost to occupiers. These are strong “market signals” that favour the creation of more B2/B8 floorspace, which Little Park Farm can supply.
- 8.13 Separate, market-facing advice from Vail Williams records “a severe shortage” of development sites in Fareham and the sub-region, creating difficulty for businesses to find premises and sites.
- 8.14 Vail Williams note that Solent 2 is too constrained to deliver the space set out in the proposed Local Plan and supply at Welborne is a long term proposition, heavily reliant upon major new infrastructure.
- 8.15 Supply at Daedalus is judged to be for a “localised” market, whereas Little Park Farm has broader appeal, greatly aided by its location and the popularity of the surrounding area for business.

## Demand

- 8.16 LSH rate the Segensworth employment areas very highly in their assessment. This is also reflected in the scores for Little Park Farm with the exception of access - until improved. They expect the Segensworth estates “to thrive throughout the Plan period.”
- 8.17 Market signals include strong demand and rising rents with better quality, modern stock being perceived as “worth paying for” and “accepted”.
- 8.18 Market consensus confirmed by Vail Williams is that Little Park Farm is viable and attractive for development, underpinned by market interest well in excess of the size of the site.
- 8.19 The strength of demand means companies must plan up to 2 years ahead to acquire space.

- 8.20 Demand at Daedalus is more localised or airport related, evidenced also by lower rents reflecting the distance from the motorway, compared to Little Park Farm.

#### Employment land guidance and SHELAA

- 8.21 It is necessary for Local Plans to be informed by robust evidence on their local economy and functional economic market areas, consistent with government guidance. Further work, which should be reflected in the Local Plan, is being done by PfSH on its spatial strategy and the area's employment and logistics needs.
- 8.22 Employment land evidence should fully explore employment forecasts (using SIC codes amongst other metrics) and prepare economic scenarios so that Local Plans are appropriately prepared and flexible.
- 8.23 Logistics is highlighted in guidance as an important growth sector to accommodate in planning policy. The importance of this locally is heightened by the connectivity created by the motorway and the role of the local ports and their distribution networks in the economy.
- 8.24 Market feedback (from property agents and the Chamber of Commerce) expresses concern about a lack of choice in the commercial property market, insufficient employment land and the limitations of other sites.
- 8.25 The SHELAA advocates a forward looking, positive and proactive examination of possibilities when exploring site constraints, being alert when circumstances change. De-allocating Little Park Farm because of a constraint that is soluble is inconsistent with this approach.
- 8.26 Even with "barriers to development" a site can be included in a Local Plan and the evidence should examine how constraints might be resolved (not just noted).
- 8.27 The NPPF states that "authorities should have a clear understanding of the land available in their area". The SHELAA says the site would be "appropriate for a development" subject to assessment of transport matters.

#### Business Needs, Site Assessments and Employment Land Study

- 8.28 Further employment land evidence and specific references to Little Park Farm are to be found in the "Business Needs, Site Assessments and Employment Land Study" by LSH.

- 8.29 Little Park Farm is not in the lowest category of six used, nor is it described in the report as being unlikely to come forward; nor is it recommended for de-allocation. To the contrary, it is described as “excellent” even though its score was affected by the need to improve the access, which is now in hand. (The report advises that site circumstances are “liable to change”.)
- 8.30 Changes to the planning system, including Permitted Development Rights, increase the need for flexibility. The study notes the dynamic and complex nature of employment land demand in the borough and nearby.
- 8.31 It also notes the NPPF’s call for policies “to help build a strong, responsive and competitive economy”.
- 8.32 South Hampshire has a relatively robust industrial property market; the report cites demand exceeding supply. Limited choice, rising rents and “sustained growth in occupier demand” are symptoms of this.
- 8.33 The market is segmented and prospective sites are not without their problems or delays or they focus on a niche. Hence, like a strong business with a cashflow problem, this means that the sum of supply does not necessarily satisfy demand when and where required. The retention of Little Park Farm as an allocation would add flexibility and help the supply side of the equation.
- 8.34 The LSH study detects a downward trend in the supply of available space on the market – down a third compared to the 5 year average to “a very low level of standing stock”. Our research shows the change has accelerated to minus 41% compared to the average.
- 8.35 Site assessments indicate the Segensworth estates “will continue to thrive”. Little Park Farm can also address the inability of the local estates to expand.
- 8.36 Conclusions by LSH include: “all potential employment sites should be retained in the emerging Local Plan”; the need to balance homes and jobs, even to the extent that “one could advocate that certain identified housing sites should be re assessed and utilised for B class development instead (or in tandem as mixed use schemes)”.
- 8.37 Furthermore, it is “far preferable to have a surplus of employment land in the Local Plan” not least for choice and because the nature of the market (especially for industrial and logistics space) means that supply is met by demand.
- 8.38 Site specific factors include:

- Welborne – likely shortfall of circa 700 jobs during the Local Plan period. Little Park Farm can deliver sooner.
- Faraday (Daedalus) – in reality Policy E2 includes non B-class space and “niche” space. HCC monitoring suggests it is already “Part Complete” meaning there is less than stated for the future pipeline. The evidence suggests a protracted rate of delivery up to 2036.
- Swordfish (Daedalus) – the Local Plan uses two figures differing by 700 sq m. Like Faraday, the space includes non B-class and “niche” uses; it also has a long term timescale.
- Solent 2 (Policy E4) – the estimated floorspace yield of 23,500 sq m of offices is historic (2008); FDL says from close knowledge of the site that this is potentially overstated by 10,330 sq m due to challenging constraints; it has not been delivered in many years and its prospects are in doubt. The plan expresses a preference for B1a use, so it is in a separate market compared to Little Park Farm (B2/B8).

8.39 The uncertainties associated with these sites are not apparent from Table 6.3, upon which the proposed Local Plan relies. Meanwhile, the development prospects of Little Park Farm are increasingly certain.

8.40 We have studied the LSH report at length. Nothing gainsays the suitability of Little Park Farm for development as intended by the existing allocation, even though the access is signalled as needing improvement. Although the council has suggested the site should be deallocated, this is not a recommendation to be found in the “Business Needs, Site Assessments and Employment Land Study”.

8.41 Our Executive Summary lists numerous benefits arising from the continued allocation of Little Park Farm, including an estimated 150 to 270 ongoing, operational jobs.

8.42 We conclude that Little Park Farm should not be de-allocated in Fareham’s proposed Local Plan and steps should be taken to proactively support the work being done on access improvements and the site’s development.

© Propernomics Ltd

December 2020

Ref: RWMLittleparkfarmroad  
Date: 18<sup>th</sup> December 2020



Vail Williams LLP  
Lakeside North Harbour  
Western Road  
Portsmouth  
PO6 3EN

Tel 023 9220 3200  
vailwilliams.com

Nigel Wolstenholme  
Frobisher Limited

Dear Nigel

**Re: Little Park Farm, Little Park Farm Road, Segensworth West**

Further to our recent conversation I was surprised to hear that Fareham Borough Council (FBC) are seeking to deallocate your land holding at the above location in the new Local Plan.

As you are aware Vail Williams have operated as a Partnership in the South East since the late 1980's and with offices at Portsmouth, Fareham, Southampton & Basingstoke were instrumental on many of the major schemes present today, including Solent Business Park, Port Solent, Gunwharf Quays, Ocean Village, Botleigh Grange office campus and Southampton Science Park.

My expertise has been in industrial & office development site sales and acquisitions as well as letting and sales strategies for the occupational market.

My most recent activities at Segensworth/Whiteley have included the sale of 5 acres for Hampshire County Council at Concorde Way and the sale of 6 acres for Allied Developments, to Kier, Lidl and KFC.

Prior to these I acquired 16 acres for you at Solent 2 East, which we subsequently sold to Catalyst Capital and then subsequently sold to Allied Developments and Business Homes. I also acquired 3 acres for ROK Developments and 4 acres for Osborne Developments on Solent Business Park

Elsewhere I have sold 4 acres to Sytner Group at Lakeside, North Harbour for a Land Rover dealership this year and 30 acres to Equation/ LaSalle at Berewood, Waterlooville in 2018.

Based on our off market discussions with Hampshire based occupiers over the last couple of years I feel that this is a grave mistake by FBC as there is a severe shortage of development sites deliverable within a two year time horizon not just within Fareham but along the entire Solent corridor of any size but in particular of this scale of approximately 12 acres.

We have clearly demonstrated that the site is viable and attractive to industrial and warehouse occupiers seeking unit sizes from 10,000 sq ft through to 50,000 sq ft in detached self-contained plots with yard areas as follows;

- |   |               |          |
|---|---------------|----------|
| • Southampton based manufacturing business: | 50, 000 sq ft | Freehold |
| • Segensworth based manufacturing business: | 50, 000 sq ft | Freehold |
| • Segensworth based distribution business:  | 15 000 sq ft  | Freehold |

Listen Care



Innovate Lead



• Segensworth based Logistics Business	20 000 sq ft	Freehold
• National leisure operator seeing	4 acres	Freehold
• Motor dealership Compound	5 acres	Leasehold
• National House Builder Storage Yard	6 acres	Freehold
• National Bus operator	5 acres	Leasehold
• National Civil Engineering company	4 acres	Freehold

Sites in this location have recently been constructed and completed namely:

- **Logistics City, Solent Way, Whiteley** – A 3-acre site developed by Kier with 60,000 sq ft (3 units.) The Scheme practically completed this month and has 38% under offer already.
- **Concord Park, Concord Way, Segensworth North** – A 5-acre site developed by Kingsbridge of 92,000 sq ft (10 units). The Scheme Practically completed this week and already has one unit let and another under offer.

I understand that the development site at Solent 2, Rookery Avenue, Whiteley is to be retained in the Local Plan, which is strange as if anything this has proved to be unviable, having been marketed by BNP (Strutt & Parker) & CBRE for over 10 years. In my mind this site sits within a residential district of Rookery Avenue hindered by ancient woodland and a water main running through it making the viability of development difficult despite the current strong demand in industrial warehouse sector. Furthermore, the constraints upon the site make it difficult to deliver as much space as might be expected from an unconstrained site of the same size. Hence Solent 2 is likely to take longer to develop and will yield less space than the 23,500 sq m assumed in the Local Plan. The location also suffers from peak time traffic congestion feeding onto the arterial route though Whiteley.

I am mindful that Welborne Garden Village, north of junction 10 of the M27 will be a major development area providing 6,000 homes with 1.13m sq ft of business floorspace including offices, R&D, industrial and warehouses. However, this is heavily reliant on junction 10 improvement works and I see this as satisfying long term (over 5 years) demand only.

Whereas, over the pandemic, we have seen a surge of enquiries to meet online retail demand and healthcare let alone more localised businesses who are seeking better quality buildings and environments to expand into.

Little Park Farm Road could see its first occupiers in 2022 with relatively modest infrastructure improvements.

Most business owners begin seeking their searches 6 to 12 months in advance of their lease events but it can take markedly longer. I have acted for industrial clients seeking premises along the Solent corridor and in recent years searches can take at least 1 to 2 years to identify suitable premises owing to the dearth in supply of built and available buildings.

The position is more severe for owner occupiers seeking freehold opportunities from 1-acre sites to turnkey new build from 10,000 sq ft. Owing to a shortage in sites with commercial planning consent, it is almost impossible to identify these opportunities. This is exaggerated as many sites are in the ownership of Institutional property funds who are only willing to lease units.



I note that Daedalus has been cited as a location to absorb demand. Whilst the location has been a success since being designated as an Enterprise Zone and Solent LEP monies deployed to improve infrastructure, it has principally been orientated to airport related uses or for small unit development which has satisfied pent up demand in the Gosport and South Fareham peninsular from either private investors or owner occupiers, attracted to smaller units of 1-2,000 sq ft.

Unfortunately, like Ensign Park, Hamble it is approximately 3.5 miles due south of the M27. Many of the industrial warehouse requirements that we deal with prefer to be located on or close to a motorway junction hence why Segensworth has become such a popular and well-established business location.

Typical industrial and logistics companies with many vehicle movements throughout the day will find the journey time to and from the motorway to be unacceptable, despite the highway improvements to Daedalus including the forthcoming Stubbington bypass. Whilst Daedalus and Ensign Park at Hamble will continue to enjoy success they invariably are at a lower rent and price point. They will draw localised demand as opposed to a location such as Little Park Farm Road at junction 9 which will also draw on regional demand.

### **Conclusion**

Having worked in the industrial and warehouse sector on the Solent corridor for 25-years the principles and criteria for good industrial location have remained the same. Quick access to motorways, located away from housing but reasonably close to a workforce. All of which are satisfied at Little Park Farm Road.

We believe that deallocating the land at Little Park Farm Road, which is well served by the motorway and located in a popular business area, would be a backward step and hinder business expansion from within the Borough, but would also deter other businesses moving into the Borough.

Please do not hesitate to contact me should you have any further questions.

Kind regards

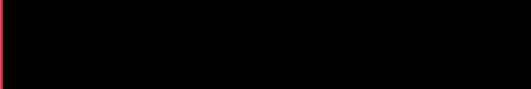
Yours sincerely

**Russell Mogridge**

Partner

Vail Williams LLP

0118 933202 202200



Listen Care



Innovate Lead

## Appendix D

**FAREHAM BOROUGH DRAFT LOCAL PLAN REVIEW  
REPRESENTATIONS ON EMPLOYMENT LAND ALLOCATION:**

**STATEMENT ON ECOLOGY ASPECTS**

*December 2020*

**DAVID BROOM**  
**Ecological Planning,**  
**Design and Management**  
18 Fisher Close,  
Banbury  
Oxfordshire  
OX16 3ZW

## CONTENTS

<b>1.0</b>	<b>INTRODUCTION.....</b>	<b>3</b>
1.1	Methodology.....	3
1.2	Biographical Note.....	4
1.3	Synopsis of Site Review .....	4
	Little Park Farm .....	4
	Solent Business Park.....	5
	Faraday Business Park and Swordfish Business Park .....	5
<b>2.0</b>	<b>REVIEW FRAMEWORK .....</b>	<b>6</b>
2.1	Fareham Borough Council Corporate Strategy 2017-2023.....	6
2.2	Development Strategy for Fareham Borough .....	6
2.3	Sustainability Appraisal and Strategic Environmental Assessment .....	9
2.4	Sustainability Appraisal of the Fareham Local Plan 2036 - Baseline Update .....	10
2.5	Strategic Housing and Employment Land Availability Assessment .....	11
<b>3.0</b>	<b>LITTLE PARK FARM DEVELOPMENT SITE .....</b>	<b>12</b>
3.1	Ecological Character and Interest.....	12
3.2	Development Proposals .....	13
3.3	Impacts on Vegetation and Habitats .....	14
3.4	Impacts on Notable and Protected Species.....	14
3.5	Comparative Allocation Site Review .....	14
	<b>APPENDIX ONE – Comparative Site Appraisal for Draft Local Plan Review.....</b>	<b>19</b>

## **1.0 INTRODUCTION**

1.0.1 This report has been prepared to support representations to the Fareham Borough Council Draft Local Plan review that seek formal recognition of land at Little Park Farm, Segensworth, as part of the Fareham Borough Strategic land allocation for employment. Key strengths of the Little Park Farm site as an employment land allocation are described through comparison with other allocation sites.

1.0.2 Draft local plan allocation sites considered in this comparative review are as follows:

- Faraday Business Park, Daedalus East, Stubbington;
- Solent Business Park, Rookery Way, Whiteley;
- Swordfish Business Park, Daedalus West, Stubbington.

1.0.3 The locations of these sites are shown in Figure One, Two and Three.

1.0.4 This report presents a comparative review of these allocation sites against the Little Park Farm proposed development site in terms of ecological considerations. In particular, these concern likely risk to designated nature conservation sites, likely risk to notable and protected wildlife species, likely risk to other features of nature conservation interest and the potential for delivery of ecological enhancement objectives. The location of the Little Park Farm site is shown in Figure Four.

## **1.1 Methodology**

1.1.1 The ecological matters considered within this review draw from the application of strategic objectives, policy objectives and site suitability criteria that form part of the Fareham Borough Council Draft Local Plan and Plan review frameworks. Draft Local Plan review considerations are used in this report as an appraisal framework to investigate the extent to which development of the sites considered in this comparative review would support Draft Local Plan policies and objectives that concern ecology and nature conservation.

1.1.2 A number of ecological assessments have been undertaken at the Little Park Farm site over a period of several years. A summary of these assessments is provided in this report, informing a review of likely implications for nature conservation of development proposals at the site. An outline development scheme has been prepared for the site, and this has been used for the review of likely implications for ecology and nature conservation described in this report.

1.1.3 An appraisal of possible consequences for ecology and nature conservation associated with development of the allocation sites is provided in this report. This appraisal is used to inform a comparative assessment of the sites and to support inclusion of the Little Park Farm site as part of the Fareham Borough Council employment sites allocation.



## **1.2 Biographical Note**

- 1.2.1 This report has been prepared by David Broom, Consultant Ecologist. David has been working as a professional ecologist advising on major development projects for over 30 years, including developments in the mineral extraction, mining and petrochemical industry, infrastructure and utilities projects and to commercial and residential developments.
- 1.2.2 David has provided evidence at a substantial number of Planning Inquiries that have included Local Plan review Inquiries. David has held several academic appointments and term consultancy commissions providing advice to Government development departments on matters of ecological impact assessment and environmental impact assessment.

## **1.3 Synopsis of Site Review**

- 1.3.1 The comparative site appraisal presented in this report has identified substantial differences in the likely outcome for Draft Local Plan review criteria that concern ecology and nature conservation matters. The comparative site appraisal is presented at Appendix One to this report, and a synopsis of conclusions drawn from the appraisal is provided below for each of the Draft Local Plan allocation sites considered.

### ***Little Park Farm***

- 1.3.2 The Little Park Farm site supports the majority of policies and criteria concerning nature conservation aspects of the Draft Local Plan review.
- 1.3.3 Extensive ecological assessments have established that development of the site would not result in adverse impacts on any designated nature conservation sites. In addition, no notable or legally protected wildlife species would be directly or indirectly impacted.
- 1.3.4 The site is located between existing locations of value for woodland nature conservation, and is situated at a location within an extensive habitat corridor associated with the M27 corridor and the Swanwick to Fareham railway line. As a consequence, ecological enhancements within the Little Park Farm site would contribute towards landscape scale habitat and ecological networks. This would be expected to benefit the conservation status of various mobile wildlife species in the locality, including birds, bats and dormice.
- 1.3.5 As the site generally lacks features of significant nature conservation interest, the implementation of ecological enhancement measures at the site through its development would be able to deliver net gain for biodiversity conservation.

### ***Solent Business Park***

- 1.3.6 Development of the Solent Business Park allocation site would contravene the majority of policies and criteria concerning nature conservation aspects of the Draft Local Plan review.
- 1.3.7 Development of the site has the potential for direct and indirect adverse impacts on a designated nature conservation site. Ecological impacts of habitat fragmentation would reduce the ecological connectivity of habitats in the locality, impairing the landscape scale ecological function of woodland, scrub and unimproved grassland habitats.
- 1.3.8 Development of the Solent Business Park allocation site would result in the loss of an extensive area of woodland, scrub and unimproved grassland habitats. These combine to create a mosaic of habitats with the capacity to support important populations of various notable and legally protected wildlife species. These include birds, bats, dormice, amphibians and reptiles.
- 1.3.9 Development of this site would result in significant adverse impacts on features of ecology and nature conservation interest that are unlikely to be mitigated through development proposals. The extent of habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation associated with development of the site are likely to be of a magnitude that would be difficult to mitigate through ecological enhancements within the development site.
- 1.3.10 As a consequence, it would be difficult for development of the site to deliver net benefits for biodiversity conservation.

### ***Faraday Business Park and Swordfish Business Park***

- 1.3.11 Development of the Faraday Business Park and Swordfish Business Park allocation sites would provide limited support for a variety of policies and criteria concerning nature conservation aspects of the Draft Local Plan review.
- 1.3.12 Development of the sites will require the removal of significant areas of established grassland habitat. This could have implications of the nature conservation interest of the grassland, in particular with regard to its potential use by ground nesting birds, reptiles and amphibians. Development of the site will also require the removal of several buildings that could be of nature conservation interest associated with their use by nesting birds and roosting bats.
- 1.3.13 The nature conservation value of ecological enhancements included within the development proposals are most likely to be confined to wildlife habitats introduced to the allocation sites. The contribution of ecological enhancements within the Faraday Business Park and Swordfish Business Park allocation sites to landscape scale nature conservation interest is unlikely to be substantial. In particular this would be the case as the sites are isolated from other sites of nature conservation interest in the locality.

## 2.0 REVIEW FRAMEWORK

2.0.1 The Fareham Borough Council Draft Local Plan review process applies a variety of review criteria and considers an extensive evidence base for scrutiny of Draft Plan objectives, policies and proposals. The following elements of the Draft Local Plan review process have been considered in the comparative review of employment land allocations sites presented in this report:

- Fareham Borough Council Corporate Strategy – 2017 to 2023;
- Development Strategy for Fareham Borough;
- Updated Sustainability Appraisal baseline report and high-level site assessment;
- Strategic Housing and Employment Land Availability Assessment.

2.0.2 Objectives and priorities for ecology and nature conservation contained within the preceding documents are set out in the following paragraphs. These are then used for a suitability appraisal of the Faraday Business Park, Solent Business Park, Swordfish Business Park and Little Park Farm site that is presented in Section 3.0 and Appendix One of this report.

### 2.1 Fareham Borough Council Corporate Strategy 2017-2023

2.1.1 Corporate Plan Priorities for the Draft Local Plan review include *inter alia*:

*“Protect and Enhance the Environment - ...make sure that... (the) natural environment (is) conserved and enhanced for future generations.”*

2.1.2 Objectives from the Council Corporate Strategy for a suitability review of the Draft Local Plan allocation sites and the Little Park Farm development site (as included within the suitability review presented in Appendix One of this report) are as follows:

<b>Fareham Borough Council Corporate Strategy 2017-2023</b>
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>
<ul style="list-style-type: none"> <li>• To ensure conservation and enhancement of the natural environment</li> </ul>

### 2.2 Development Strategy for Fareham Borough

2.2.1 A Development Strategy for Fareham Borough is presented within Section 2 of the local plan supplement. At para 2.3 of the Development Strategy it is stated that:

*“At the heart of the Development Strategy proposed for Fareham is the concept of good growth. Good growth means...protecting the most valued natural...environments. Developments need to respect environmental protections and deliver opportunities for environmental gain...whilst sensitively managing the countryside and valued landscapes.”*

2.2.2 At para 2.11 the local plan supplement states:

*“...the need (for development) to respect areas designated for nature conservation interest, both in terms of the intrinsic interest of the site in question and its role in a wider ecological network.”*

2.2.3 At para 2.18 the plan supplement states that:

*“This Development Strategy has been used to determine the suitability of proposed sites for development, alongside...the need to protect and enhance the ecological issues (sic)”*

2.2.4 The Natural Environment is considered in Section 4.0 of the development plan supplement. At para 4.2, the local plan supplement states that:

*“The NPPF states that planning policies 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.”*

2.2.5 At para 4.17 a proposed development plan policy concerning landscape conservation is described:

*Policy NEXX: Landscape*

*Development proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of landscape character areas. Development in the countryside will be permitted where it contributes to and enhances the landscape with particular regard to (inter alia):*

- d) The landscape’s role as part of the existing Local Ecological network;*
- f) Natural landscape features, such as trees, ancient woodland, hedgerows, water features and their function as ecological networks.*

*Major development proposals must include a comprehensive landscaping...enhancement scheme to ensure that the development is able to successfully integrate with the landscape and surroundings.*

- 2.2.6 At para 4.23 a proposed development plan policy concerning trees, woodland and hedgerows is described:

*Policy NEXX: Trees, Woodland and Hedgerows*

*The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.*

*A proposed loss or damage of non-protected trees, woodland or hedgerows which have high amenity values should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required.*

*Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an ecological survey and arboricultural method statement.*

*Where possible, opportunities for planting of new trees, woodlands and hedgerows should be identified and incorporated; particularly where this would help mitigate and adapt to the effects of climate change. New planting should be suitable for the site conditions, use native species where appropriate, build in resilience by a varied choice of species and be informed by and contribute to local character, and enhance or create new habitat linkages.*

- 2.2.7 With regard to the conservation of trees, woodlands and hedgerows, at para 4.28, the local plan supplement states that:

*“...the Council will seek opportunities for the planting of new trees, woodlands and hedgerows. This can be included as part of a development’s proposal to achieve net gains for biodiversity...Any new planting should be suitable for the site conditions, use native species where appropriate and be informed by and contribute to local character, and enhance or create new habitat linkages. The Ecological Network Map produced by the Hampshire Biodiversity Information Centre (HBIC) which covers the whole of Hampshire, highlights areas where additional planting could help improve habitat linkages and biodiversity.”*

- 2.2.8 Objectives from the Fareham Borough Council Development Strategy for a suitability review of the Draft Local Plan allocation sites and the Little Park Farm development site (as included within the suitability review presented in Appendix One of this report) are as follows:

Development Strategy for Fareham Borough	
Synopsis of Local Plan Review objectives for ecology and nature conservation	
	<ul style="list-style-type: none"> <li>• Protect the most valued natural environments, respect environmental protections and deliver opportunities for environmental gain</li> <li>• Respect the intrinsic interest of areas designated for nature conservation interest, and their role in a wider ecological network</li> <li>• Determine the suitability of proposed sites for development, considering the need to protect and enhance ecological interest</li> <li>• Enhance the natural and local environment by protecting and enhancing valued landscapes</li> <li>• Draft Local Plan Policy objective - Development in the countryside will be permitted where it contributes to and enhances the landscape with particular regard to the landscape's role as part of the existing Local Ecological network, and natural landscape features, and their contribution to ecological networks</li> <li>• Draft Local Plan Policy objective - Major development proposals must include a comprehensive landscaping enhancement scheme to ensure landscape integration</li> <li>• Draft Local Plan Policy objectives - proposed loss or damage of non-protected trees, woodland or hedgerows which have high amenity values should be avoided, and if unavoidable, replacement or compensation will be required</li> <li>• Draft Local Plan Policy objectives - opportunities for planting of new trees, woodlands and hedgerows should be identified and incorporated, contributing to enhancement or creation of habitat linkages</li> </ul>

## 2.3 Sustainability Appraisal and Strategic Environmental Assessment

2.3.1 January 2020 Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan 2036 - Interim Sustainability Report.

2.3.2 Sustainability Appraisal (SA) objectives for the Fareham Local Plan 2036 are summarised at para 2.3.4 of the Interim Sustainability Report. These include, *inter alia*: SA Objective 7 - To conserve and enhance biodiversity. Performance indices for this objective of the Fareham Local Plan 2036 SA are as follows:

Q7a	Protect and enhance internationally, nationally and locally designated habitats
Q7b	Protect and enhance priority habitats, and the habitat of priority species
Q7c	Achieve a net gain in biodiversity
Q7d	Enhance biodiversity through the restoration and creation of well-connected multifunctional green infrastructure
Q7e	Contribute to the achievement of Accessible Natural Greenspace Standards

2.3.3 The SA of the Fareham Local Plan 2036 includes a Site Options Assessment against each performance objective. With regard to SA Performance Objective 7 (To conserve and enhance biodiversity), the Site Options Assessment utilised the following geographic constraints datasets, as defined within the SA:

- **International sites** - Special Areas of Conservation, Special Protection Areas;
- **National sites** - Ramsar sites, Sites of Special Scientific Interest;
- **Local sites** - Marine Conservation Zones, National Nature Reserves, Local Nature Reserves, Ancient Woodland, Biodiversity Opportunity Areas, Wader & Brent Goose Network, Priority Habitats, Road Verges of Ecological Importance, Sites of Importance to Nature Conservation.



2.3.4 The Site Options Assessment utilised the following indicative scoring criteria:

- Ecological features within designated buffer zones;
- If it is clear that ecological features will be lost;
- No ecological features affected.

2.3.5 Objectives from the Fareham Local Plan Sustainability Appraisal for a suitability review of the Draft Local Plan allocation sites and the Little Park Farm development site (as included within the suitability review presented in Appendix One of this report) are as follows:

<b>Sustainability Appraisal and Strategic Environmental Assessment</b>
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>
<ul style="list-style-type: none"> <li>• Protect and enhance internationally, nationally and locally designated habitats</li> <li>• Protect and enhance priority habitats, and the habitat of priority species</li> <li>• Achieve a net gain in biodiversity</li> <li>• Enhance biodiversity through the restoration and creation of well-connected multifunctional green infrastructure</li> <li>• Contribute to the achievement of Accessible Natural Greenspace Standards</li> </ul>

## **2.4 Sustainability Appraisal of the Fareham Local Plan 2036 - Baseline Update**

2.4.1 The Sustainability Appraisal of the Fareham Local Plan 2036 includes a Baseline Update. Key issues for biodiversity relevant to the Local Plan are outlined at para 3.11.1 of the Update. These include the following:

- Potential impacts on priority habitats and species from new developments. Protected species are also present within the borough, including badger, bats, breeding birds, dormouse, great crested newt and reptiles;
- There are significant opportunities for biodiversity enhancement in the area, including at the landscape scale;
- Potential effects on designated sites of nature conservation interest;
- Hedgerows are important local biodiversity assets some of which may be lost to development;
- There are significant opportunities for tree planting and improved management of woodland through... development;
- Protecting and enhancing the area's green...infrastructure network will support local and sub-regional biodiversity networks by helping to improve connectivity for habitats and species, and provide benefits to local communities in terms of health and wellbeing;
- Improvements in local ecological networks will support biodiversity's adaptation to climate change;
- Access to the natural environment should be maintained and supported by the Local Plan.

2.4.2 In addition, key issues for biodiversity identified within consideration of Landscape are described at para 10.9.1 of the SA Baseline Update. This includes:

- Pressures on non-designated sites and landscapes: loss of key landscape features such as woodland or hedgerows.

2.4.3 Objectives from the Fareham Local Plan Sustainability Appraisal Baseline Update for a suitability review of the Draft Local Plan allocation sites and the Little Park Farm development site (as included within the suitability review presented in Appendix One of this report) are as follows:

Sustainability Appraisal of the Fareham Local Plan 2036 - Baseline Update
Synopsis of Local Plan Review objectives for ecology and nature conservation
<ul style="list-style-type: none"> <li>• Potential impacts on priority habitats, species and protected species</li> <li>• Opportunities for biodiversity enhancement in the area, including at the landscape scale</li> <li>• Effects on designated sites of nature conservation interest</li> <li>• Potential impacts on hedgerows as important local biodiversity assets</li> <li>• Opportunities for tree planting and improved management of woodland</li> <li>• Protecting and enhancing the area's green infrastructure network to support local and sub-regional biodiversity networks, improving connectivity for habitats and species, and providing health and wellbeing benefits to local communities</li> <li>• Improved ecological networks will support biodiversity's adaptation to climate change</li> <li>• Access to the natural environment should be maintained and supported</li> <li>• Pressures on non-designated conservation sites and landscapes</li> </ul>

## 2.5 Strategic Housing and Employment Land Availability Assessment

2.5.1 The Fareham Local Plan 2036 - Strategic Housing and Employment Land Availability Assessment (SHELAA) (December 2019) identifies Constraints and Potential Impacts for the strategic assessment of housing and employment land site suitability. These include the consideration of nature conservation aspects:

***"Nature Conservation** - There are international, national and local nature designations. This can act as a constraint on a site or render it unsuitable. This will depend on the individual nature conservation designation and potentially the detailed reasons for such a designation. Nature conservation constraints can also apply even when the land itself is not affected. If neighbouring land to the potential development site has a nature designation, then this may require mitigation or consideration..."*

2.4.4 Objectives from the Strategic Housing and Employment Land Availability Assessment for a suitability review of the Draft Local Plan allocation sites and the Little Park Farm development site (as included within the suitability review presented in Appendix One of this report) are as follows:

Fareham Local Plan 2036 - Strategic Housing and Employment Land Availability Assessment
Synopsis of Local Plan Review objectives for ecology and nature conservation
<ul style="list-style-type: none"> <li>• Implications for international, national and local nature designations</li> <li>• Implications for nature conservation sites when the land itself is not directly affected by development</li> </ul>

### **3.0 LITTLE PARK FARM DEVELOPMENT SITE**

3.0.1 This section provides an outline of the ecological character and interest of the Little Park Farm development site. A series of ecological surveys have been undertaken at the site since 2018 that have informed an assessment of the site's interest for wildlife habitats, notable and protected wildlife species. The findings of these surveys and assessments are summarised in the following paragraphs.

#### **3.1 Ecological Character and Interest**

3.1.1 The Little Park Farm development site occupies a corridor of land between the M27 to the north and a railway line to the south, west of junction 9 on the M27. The site has a relatively level topography, falling across gently sloping land to the east and west. The location and extent of the site is shown in Figure Four.

3.1.2 The western and eastern site boundaries are defined by blocks of mature broadleaved woodland. The northern site boundary is defined by a belt of established amenity woodland planted along a section of M27 embankment, with further broadleaved woodland along a railway embankment defining the southern boundary. A belt of established broadleaved woodland and mature scrub extends into the development site from its northern boundary.

3.1.3 The site comprises a series of discrete land parcels, including one bungalow building with associated out buildings. Adjacent to the bungalow is a stable block used to house horses that are grazed on surrounding paddock grassland. The land parcels that comprise the majority of the site consist of reseeded pasture grassland in use as horse paddocks.

3.1.4 Land to the east of the horse paddocks contains a light industrial plot with an extensive hard standing area and an open fronted warehouse building. The site also contains a small administration building.

3.1.5 A land parcel at the eastern end of the site is an extensive area of former horse grazing paddock that contains tall ruderal vegetation likely to have developed on ground trampled by horses.

3.1.6 The development site has vehicular access along its southern edge via a road that passes beneath the adjacent railway line. The road has a sinuous alignment, with broad road verges that are regularly mown to maintain a short sward, grass-dominated verge vegetation.

3.1.7 The wildlife habitats recorded within the proposed development site and shown on Figure Four are of no significant nature conservation interest. They are examples of widespread wildlife habitat types, and include extensive areas of grassland that are maintained by reseeded and management to maintain forage value as horse pasture.

3.1.8 A programme of protected species surveys has been undertaken at the site, including surveys for bats, Great Crested Newts, reptiles, Dormice and badgers. These surveys found no evidence for habitat utilisation by these protected species. Some bat commuting and foraging was recorded along woodland abutting the southern site boundary.

- 3.1.9 With regard to sites and features of nature conservation interest in the vicinity of the development site, these are shown in Figure Five to Eight. Figures Five and Six show that no statutory or non-statutory nature conservation designations apply to any part of the development site. A corridor of land that contains a number of statutory and non-statutory nature conservation sites is present to the north, separated from the development site by the M27 along the northern site boundary.
- 3.1.10 Figure Seven and Figure Eight recognise the nature conservation interest of woodland habitats within and adjacent to the development site. Woodland patches that define the eastern and western site boundaries and that extend into the site from the northern boundary are identified as examples of lowland mixed deciduous woodland Priority Habitat as described within the United Kingdom Biodiversity Action Plan (UK BAP).
- 3.1.11 Figure Seven shows these woodland blocks as forming part of a more extensive network of broadleaved, mixed and yew woodland UK BAP Broad Habitat types. No other UK BAP Priority or Broad habitat types identified on Figure Seven or Eight are indicated as occurring within the development site.

## **3.2 Development Proposals**

- 3.2.1 Development of the Little Park Farm site would comprise two components. The main site would be developed to accommodate a series of commercial units with associated access and other infrastructure. In addition, access to the site from Little Park Farm Road would be modified.
- 4.1.1 The entire development would be set within a landscape structure that would comprise a combination of retained landscape features and new features introduced through implementation of a landscape design scheme.
- 3.2.2 The entire site would be progressively developed as a series of development phases. Development will not encroach upon the eastern and western woodland areas. In addition, the woodland corridor that extends into the site from the north will also be retained intact.
- 3.2.3 Site access improvements involve amending the vertical alignment of Little Park Farm Road to provide increased headroom clearance beneath the railway underpass to accommodate heavy goods vehicles. In addition, the horizontal alignment of the Little Park Farm Road will be straightened and modified to accommodate passing places. This will increase the capacity of the road for long wheelbase vehicles. This will require lateral expansion of the road pavement onto roadside verges.
- 3.2.4 Development of the Little Park Farm site would include opportunities for substantial ecological enhancement. In particular, these would comprise the following elements:
- Site boundary ecological buffer strips would be established, helping to increase the biodiversity value of the site prior to its development. The ecological buffer strips would be protected from disturbance during implementation of site development, and would benefit from consolidation through the inclusion of ecological enhancement measures that would extend throughout development and landscape design proposals for the site;

- The site boundary ecological buffer strips would provide opportunities for the creation of wildflower-rich grassland. This would provide general ecological enhancement benefits and would consolidate the ecological interest of adjacent woodland edge habitats;
- The ecological buffer along the northern boundary of the proposed development site would include a strip of native species tree and shrub planting to create a wooded habitat strip that will help to maintain ecological continuity along the northern boundary of the development site, complementing wooded habitats along the adjacent section of motorway embankment;
- Development of the site would include the preparation of a landscape design scheme to provide a setting for individual development plots. A landscape structure would be developed that would encourage wildlife species dispersal through the site. In particular, this would involve the introduction of linear habitat features that would benefit ecological connectivity. The structure and composition of landscape planting proposals would reflect and replicate existing habitats and ecological communities of nature conservation interest and importance in the locality.

### **3.3 Impacts on Vegetation and Habitats**

- 3.3.1 With regard to impacts on vegetation and habitats that are likely to arise from development of the Little Park Farm site no part of the proposed development has the potential to result in adverse impacts of vegetation and habitat loss that are of a severity that is greater than the level of the development site.
- 3.3.2 In particular, semi-natural broadleaved woodland that is considered to be of District nature conservation interest will be retained intact and not encroached upon by any aspect of site development.

### **3.4 Impacts on Notable and Protected Species**

- 3.4.1 With regard to the extent of impacts on notable and protected wildlife species that are likely to arise from implementation of the proposed development, on the basis of assessments carried out during 2019 there is negligible potential for adverse impacts on roosting bats, commuting and foraging bats, nesting birds, reptiles, amphibians, Dormice and Badgers.

### **3.5 Comparative Allocation Site Review**

- 3.5.1 The preceding summary of information on features of nature conservation interest at the Little Park Farm site and outline of development proposals for the site are used to inform the comparative site review presented at Appendix One to this report.

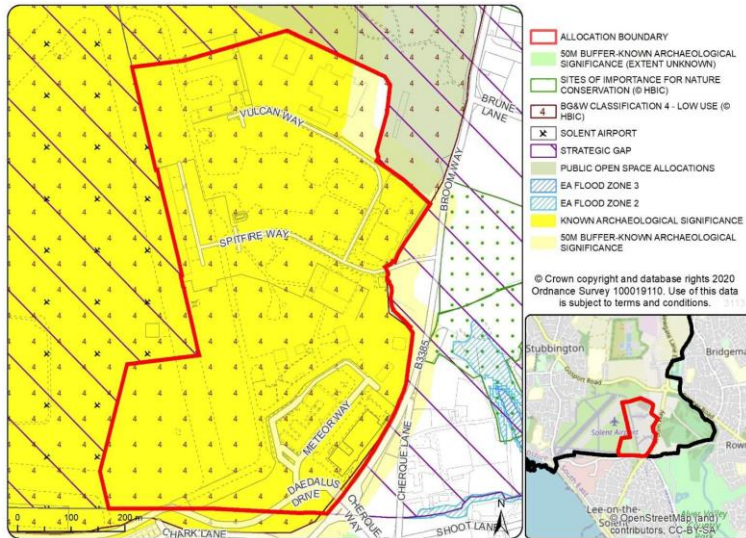


Figure One - Faraday Business Park Allocation Site

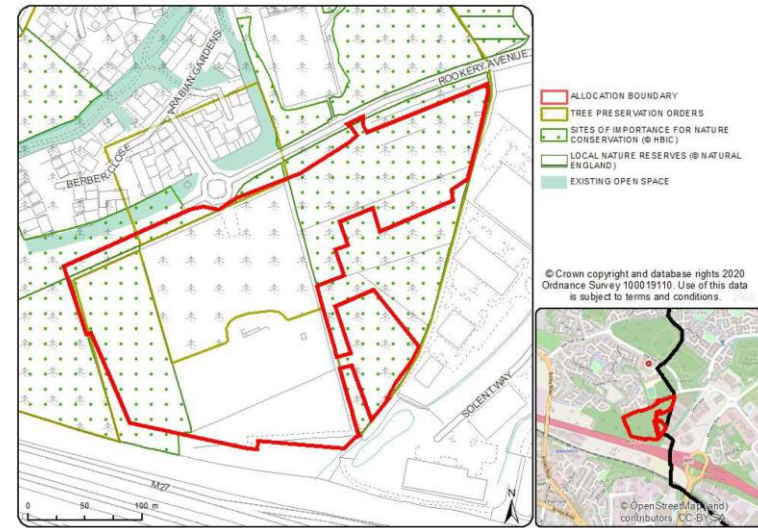


Figure Two - Solent Business Park Allocation Site

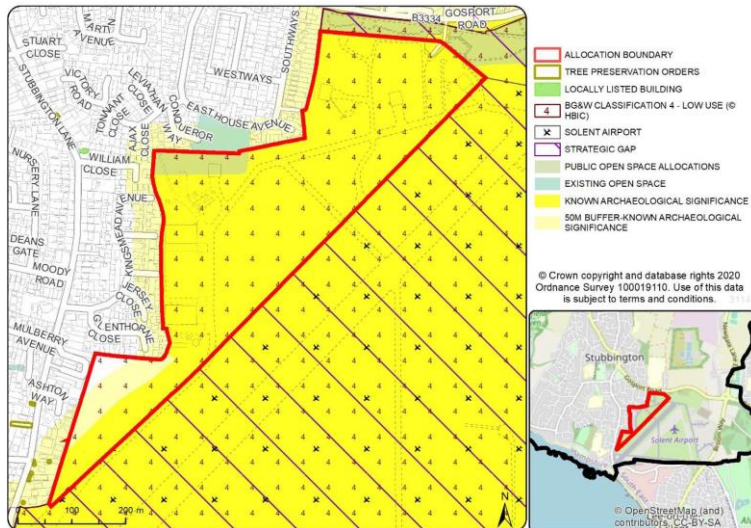
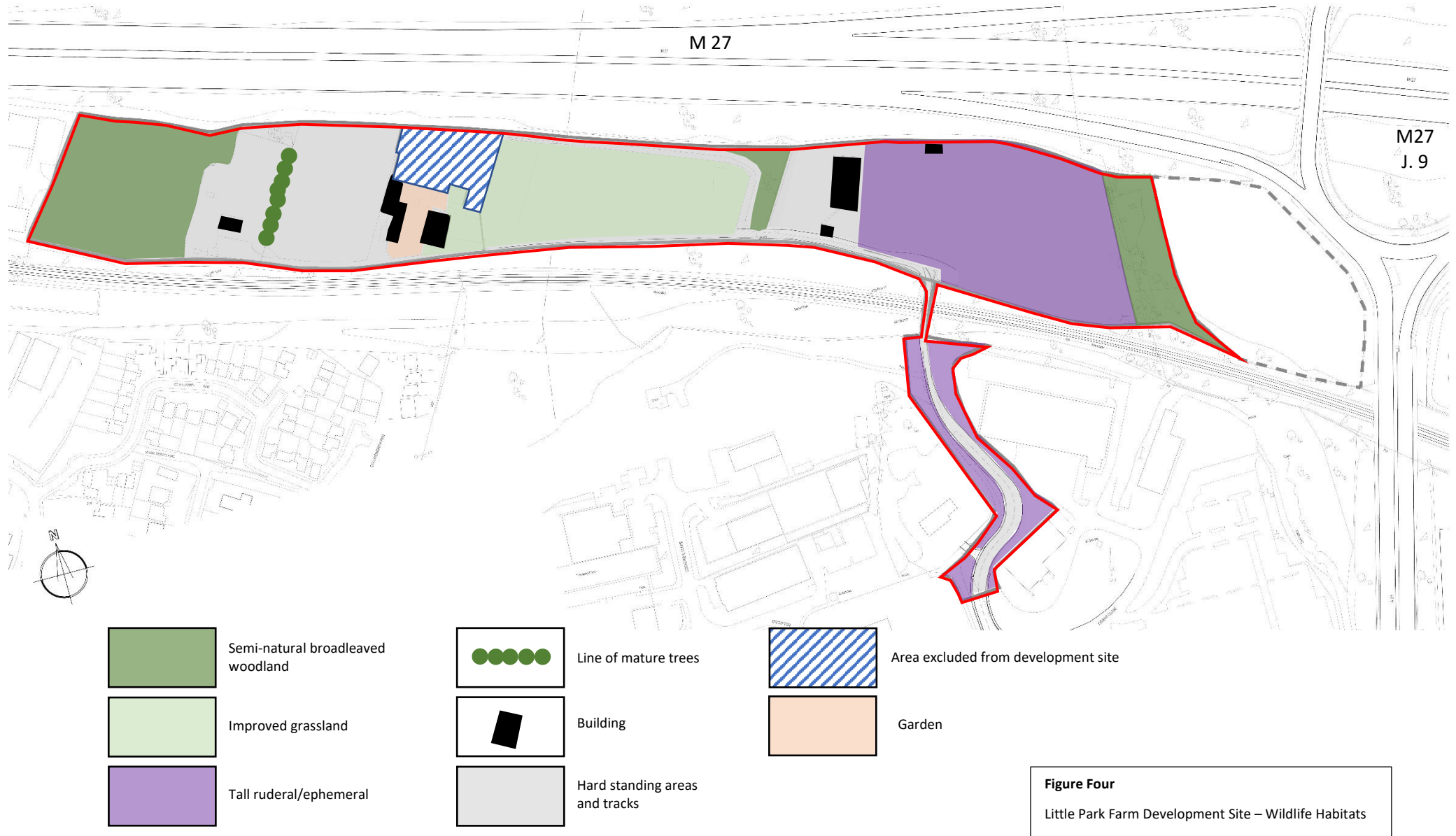
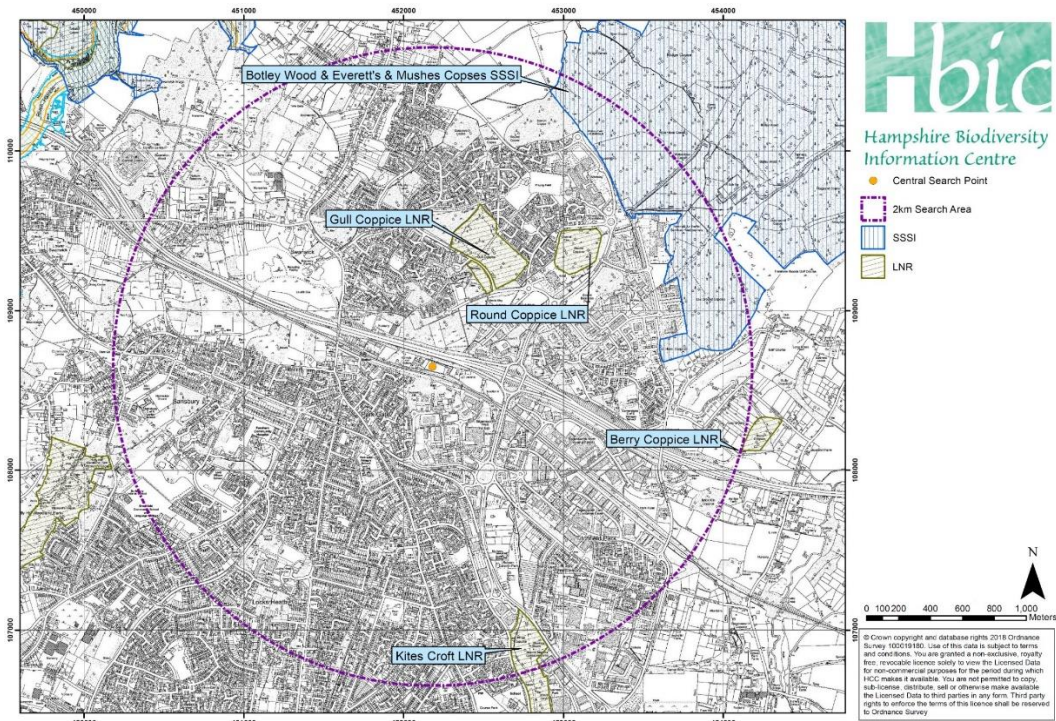


Figure Three - Swordfish Business Park Allocation Site

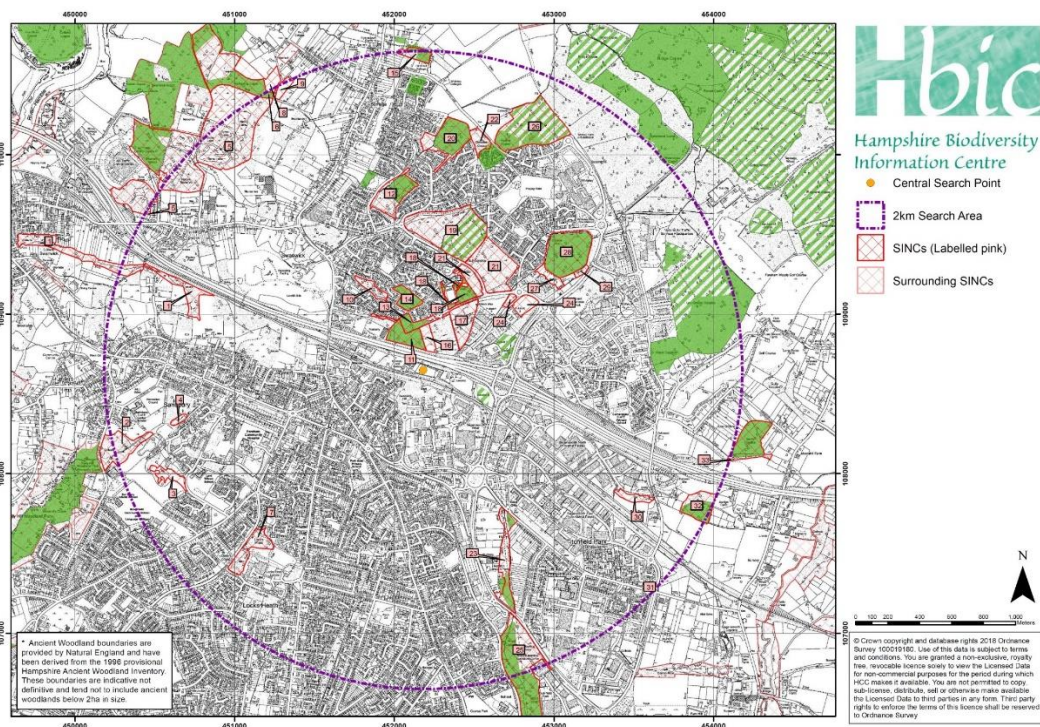






**Figure Five**

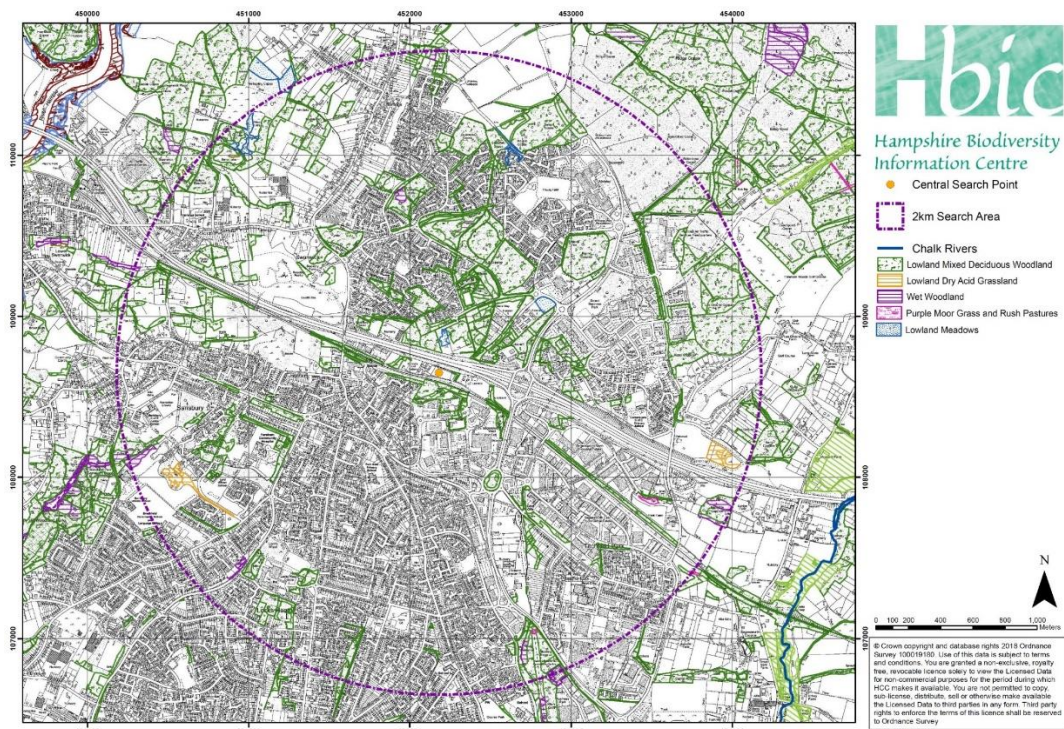
Little Park Farm Development Site – Statutory Nature Conservation Sites



**Figure Six**

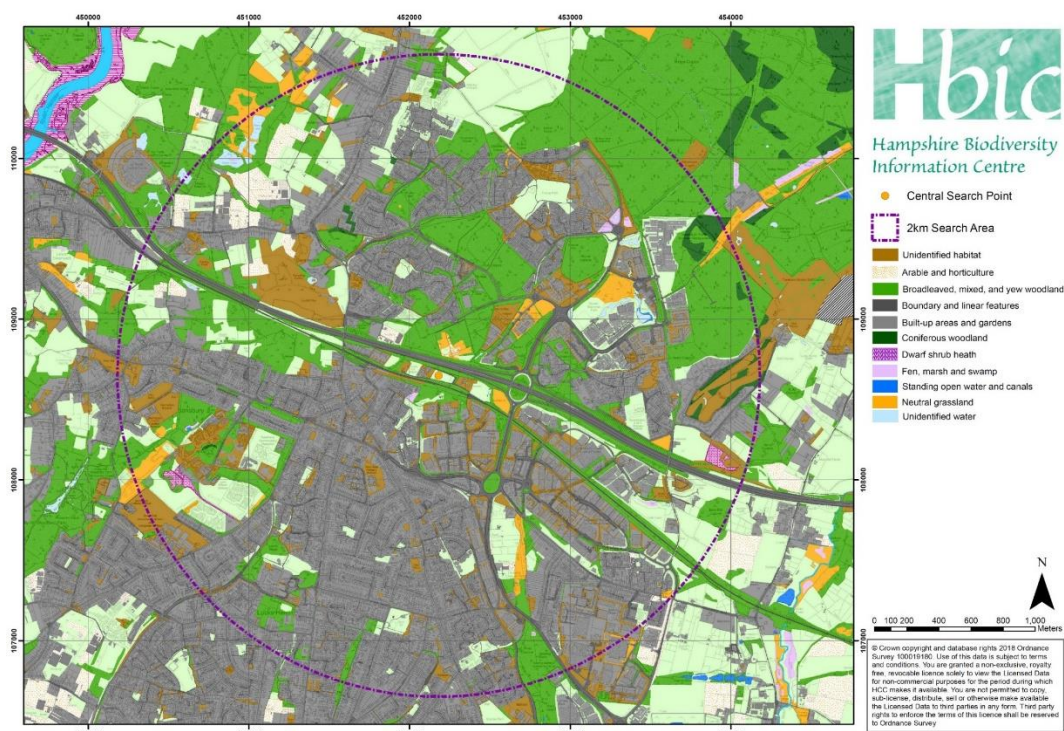
Little Park Farm Development Site – Non-statutory Nature Conservation Sites





**Figure Seven**

Little Park Farm Development Site – Priority Habitats



**Figure Eight**

Little Park Farm Development Site – Broad Habitats

## APPENDIX ONE – Comparative Site Appraisal for Draft Local Plan Review

This Appendix provides a summary review of the Little Park Farm, Solent Way Business Park, Swordfish Business Park and Faraday Business Park Fareham Borough Council Draft Local Plan allocation sites against the following Draft Local Plan review frameworks:

- Fareham Borough Council Corporate Strategy – 2017 to 2023;
- Development Strategy for Fareham Borough;
- Updated Sustainability Appraisal baseline report and high-level site assessment;
- Strategic Housing and Employment Land Availability Assessment.

Comments are provided in the following tables for each allocation site against key Draft Local Plan review objectives that concern nature conservation matters contained within the Draft Local Plan review frameworks.

### Little Park Farm

Fareham Borough Council Corporate Strategy 2017-2023				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
<ul style="list-style-type: none"> <li>• To ensure conservation and enhancement of the natural environment</li> </ul>	<ul style="list-style-type: none"> <li>• No designated nature conservation sites would be directly or indirectly impacted by development of the site.</li> <li>• No direct adverse impacts upon notable or legally protected wildlife habitats or species would result from the proposed development.</li> <li>• Indirect impacts upon woodland habitats and wildlife adjacent to the development site would be avoided by the establishment of a</li> </ul>	<ul style="list-style-type: none"> <li>• Development of the Solent Business Park site would result in direct and indirect adverse impacts on a nature conservation designation.</li> <li>• Development of the site would result in the loss of woodland, scrub and unimproved grassland.</li> <li>• The habitats that would be affected by development of this site combine to create a habitat mosaic likely to</li> </ul>	<ul style="list-style-type: none"> <li>• Development of the Swordfish Business Park allocation site would provide support for a variety of policies and criteria concerning nature conservation aspects of the Draft Local Plan review.</li> <li>• Development of the site will require the removal of significant areas of established grassland habitat. This could have implications</li> </ul>	<ul style="list-style-type: none"> <li>• Development of the Faraday Business Park allocation site would provide support for a variety of policies and criteria concerning nature conservation aspects of the Draft Local Plan review.</li> <li>• Development of the site will require the removal of significant areas of established grassland habitat. This could have implications of the nature conservation</li> </ul>

<b>Fareham Borough Council Corporate Strategy 2017-2023</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
	<p>site perimeter ecological protection buffer.</p> <ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> <li>As the site is located between existing locations of value for woodland nature conservation, and is situated at a location within an extensive habitat corridor associated with the M27 corridor and the Swanwick to Fareham railway line, ecological enhancements within the Little Park Farm site would contribute towards landscape scale habitat and ecological networks.</li> <li>This would be expected to benefit the conservation status of various mobile wildlife species in the locality, including birds, bats and dormice.</li> </ul>	<p>support important populations of notable and legally protected wildlife species. These include birds, bats, dormice, amphibians and reptiles.</p> <ul style="list-style-type: none"> <li>Ecological impacts of habitat fragmentation would reduce the ecological connectivity of habitats in the locality, impairing the landscape scale ecological function of woodland, scrub and unimproved grassland.</li> <li>The extent of habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation associated with development of the site are likely to be of a magnitude that would be difficult to mitigate through ecological enhancements within the development site.</li> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development to deliver net benefits for biodiversity conservation.</li> </ul>	<p>of the nature conservation interest of the grassland, in particular with regard to its potential use by ground nesting birds, reptiles and amphibians.</p> <ul style="list-style-type: none"> <li>Development of the site will also require the removal of several buildings that could be of nature conservation interest associated with their use by nesting birds and roosting bats.</li> <li>The nature conservation value of ecological enhancements included within the development proposals are most likely to be confined to wildlife habitats introduced to the site.</li> <li>The contribution of ecological enhancements within the Swordfish Business Park allocation sites to landscape scale nature conservation interest is unlikely to be substantial. In particular this would be the case as the site is isolated from other sites of nature conservation interest in the locality.</li> </ul>	<p>interest of the grassland, in particular with regard to its potential use by ground nesting birds, reptiles and amphibians.</p> <ul style="list-style-type: none"> <li>Development of the site will also require the removal of several buildings that could be of nature conservation interest associated with their use by nesting birds and roosting bats.</li> <li>The nature conservation value of ecological enhancements included within the development proposals are most likely to be confined to wildlife habitats introduced to the site.</li> <li>The contribution of ecological enhancements within the Faraday Business Park allocation sites to landscape scale nature conservation interest is unlikely to be substantial. In particular this would be the case as the site is isolated from other sites of nature conservation interest in the locality.</li> </ul>

<b>Development Strategy for Fareham Borough</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
<ul style="list-style-type: none"> <li>Protect the most valued natural environments, respect environmental protections and deliver opportunities for environmental gain</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon notable or legally protected wildlife habitats or species would result from the proposed development.</li> <li>Indirect impacts upon woodland habitats and wildlife adjacent to the development site would be avoided by the establishment of a site perimeter ecological protection buffer.</li> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the Solent Business Park allocation site would result in direct and indirect adverse impacts on a designated nature conservation site.</li> <li>Development of the site would result in the loss of an extensive area of woodland, scrub and unimproved grassland habitats.</li> <li>The habitats that would be affected by development of this site combine to create a mosaic of habitats with the capacity to support important populations of various notable and legally protected wildlife species. These include birds, bats, dormice, amphibians and reptiles.</li> <li>The extent of habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation associated with development of the site are likely to be of a magnitude that would be difficult to mitigate through</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly impacted upon by development of this site.</li> <li>Notable and legally protected wildlife species could be adversely affected by development of this site.</li> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly impacted upon by development of this site.</li> <li>Notable and legally protected wildlife species could be adversely affected by development of this site.</li> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> </ul>



<b>Development Strategy for Fareham Borough</b>				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
		<p>ecological enhancements within the development site.</p> <ul style="list-style-type: none"> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development to deliver net benefits for biodiversity conservation.</li> </ul>		
<ul style="list-style-type: none"> <li>Respect the intrinsic interest of areas designated for nature conservation interest, and their role in a wider ecological network</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly affected by the proposed development</li> <li>As the site is located between existing locations of value for woodland nature conservation, and is situated at a location within an extensive habitat corridor associated with the M27 corridor and the Swanwick to Fareham railway line, ecological enhancements within the Little Park Farm site would contribute towards landscape scale habitat and ecological networks.</li> <li>This would be expected to benefit the conservation status of various mobile wildlife species in the locality, including birds, bats and dormice.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the Solent Business Park allocation site has the potential for direct and indirect adverse impacts on a designated nature conservation site.</li> <li>Habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation would be expected to have landscape-scale adverse ecological impacts.</li> <li>In particular, habitats that would be affected by development of this site combine to create a mosaic of habitats with the capacity to support important populations of various notable and legally protected wildlife species that rely upon landscape scale habitat</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly impacted upon by development of this site.</li> <li>Development proposals would have the potential for incorporation of new wildlife habitat features. These will be relatively isolated from designated nature conservation sites in the locality and as a consequence are unlikely to make a significant beneficial contribution to wider ecological networks that feature designated nature conservation sites.</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly impacted upon by development of this site.</li> <li>Development proposals would have the potential for incorporation of new wildlife habitat features. These will be relatively isolated from designated nature conservation sites in the locality and as a consequence are unlikely to make a significant beneficial contribution to wider ecological networks that feature designated nature conservation sites.</li> </ul>

Development Strategy for Fareham Borough				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
		associations. These include birds, bats, dormice, amphibians and reptiles.		
<ul style="list-style-type: none"> <li>Determine the suitability of proposed sites for development, considering the need to protect and enhance ecological interest</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon notable or legally protected wildlife habitats or species would result from the proposed development.</li> <li>Indirect impacts upon woodland habitats and wildlife adjacent to the development site would be avoided by the establishment of a site perimeter ecological protection buffer.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would fail to achieve ecological protection objectives. Development of the site would fail to achieve ecological enhancement objectives that seek a net gain for biodiversity conservation.</li> <li>Development of the Solent Business Park allocation site has the potential for direct and indirect adverse impacts on a designated nature conservation site.</li> <li>Development of the site would result in the loss of an extensive area of woodland, scrub and unimproved grassland habitats.</li> <li>The habitats that would be affected by development of this site combine to create a mosaic of habitats with the capacity to support important populations of various notable and legally protected wildlife species. These include birds, bats,</li> </ul>	<ul style="list-style-type: none"> <li>Relatively few features of nature conservation interest are likely to be present within the development site, likely to require modest interventions to ensure protection.</li> <li>Development proposals are unlikely to require significant commitments towards ecological enhancement to achieve ecological impact mitigation objectives. However, development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> </ul>	<ul style="list-style-type: none"> <li>Relatively few features of nature conservation interest are likely to be present within the development site, likely to require modest interventions to ensure protection.</li> <li>Development proposals are unlikely to require significant commitments towards ecological enhancement to achieve ecological impact mitigation objectives. However, development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> </ul>

<b>Development Strategy for Fareham Borough</b>				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
		<p>dormice, amphibians and reptiles.</p> <ul style="list-style-type: none"> <li>The extent of habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation associated with development of the site are likely to be of a magnitude that would be difficult to mitigate through ecological enhancements within the development site.</li> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development to deliver net benefits for biodiversity conservation.</li> </ul>		
<ul style="list-style-type: none"> <li>Enhance the natural and local environment by protecting and enhancing valued landscapes</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites or Priority Habitats would be directly affected by development of this site.</li> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the Solent Business Park allocation site has the potential for direct and indirect adverse impacts on a designated nature conservation site.</li> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites or Priority Habitats would be directly affected by development of this site.</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites or Priority Habitats would be directly affected by development of this site.</li> </ul>

Development Strategy for Fareham Borough				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
		to deliver net benefits for biodiversity conservation.		
<ul style="list-style-type: none"> <li>Draft Local Plan Policy objective - Development in the countryside will be permitted where it contributes to and enhances the landscape with particular regard to the landscape's role as part of the existing Local Ecological network, and natural landscape features, and their contribution to ecological networks</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> <li>Ecological enhancement within the proposed development site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>The extent of habitat loss from within the development site, and the likely significance of indirect impacts of habitat fragmentation associated with development of the site are likely to be of a magnitude that would be difficult to mitigate through ecological enhancements within the development site.</li> <li>Habitat loss and disturbance likely to arise from development of this site is likely to impact upon the site's contribution to landscape scale ecological benefits of habitat associations, likely to be of benefit for the conservation of notable and legally protected wildlife species that would include wild birds, bats, dormice, reptiles and amphibians.</li> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>The site is set within an area that is generally isolated from sites of nature conservation importance in the surrounding landscape. As a consequence, ecological enhancements within the development site would create a location of interest that has the potential to benefit the nature conservation interest of surrounding areas by potentially providing a colonisation source for wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>The site is set within an area that is generally isolated from sites of nature conservation importance in the surrounding landscape. As a consequence, ecological enhancements within the development site would create a location of interest that has the potential to benefit the nature conservation interest of surrounding areas by potentially providing a colonisation source for wildlife.</li> </ul>

<b>Development Strategy for Fareham Borough</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
		to deliver net benefits for biodiversity conservation.		
<ul style="list-style-type: none"> <li>Draft Local Plan Policy objective - Major development proposals must include a comprehensive landscaping enhancement scheme to ensure landscape integration</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Considering the extent of direct adverse impacts of habitat loss that would result from development of this site, landscape enhancement proposals are unlikely to achieve landscape integration in terms of landscape scale habitat associations, ecological function and contribution towards biodiversity conservation objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>
<ul style="list-style-type: none"> <li>Draft Local Plan Policy objectives - proposed loss or damage of non-protected trees, woodland or hedgerows which have high amenity values should be avoided, and if unavoidable, replacement or compensation will be required</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon trees, woodland or hedgerows would result from the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>A significant area of woodland, scrub and other wooded habitats would be directly impacted upon by clearance from the development site.</li> <li>The magnitude of ecological impacts associated with woodland, tree and wooded habitat loss from the site is unlikely to be adequately compensated by limitations on the extent of tree planting</li> </ul>	<ul style="list-style-type: none"> <li>Development of this site will require relatively limited loss of existing trees, woodland or hedgerows.</li> </ul>	<ul style="list-style-type: none"> <li>Development of this site will require relatively limited loss of existing trees, woodland or hedgerows.</li> </ul>

<b>Development Strategy for Fareham Borough</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
		that would be possible within a development scheme for the site.		
<ul style="list-style-type: none"> <li>Draft Local Plan Policy objectives - opportunities for planting of new trees, woodlands and hedgerows should be identified and incorporated, contributing to enhancement or creation of habitat linkages</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that include new tree planting to support ecological enhancement objectives.</li> <li>Ecological enhancement within the proposed development site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>A significant area of woodland, scrub and other wooded habitats would be directly impacted upon by clearance from the development site.</li> <li>The magnitude of ecological impacts associated with woodland, tree and wooded habitat loss from the site is unlikely to be adequately compensated by limitations on the extent of tree planting that would be possible within a development scheme for the site.</li> </ul>	<ul style="list-style-type: none"> <li>Landscape design proposals within the development site would have opportunities to include new tree planting to support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Landscape design proposals within the development site would have opportunities to include new tree planting to support ecological enhancement objectives.</li> </ul>



<b>Sustainability Appraisal and Strategic Environmental Assessment</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
<ul style="list-style-type: none"> <li>Protect and enhance internationally, nationally and locally designated habitats</li> </ul>	<ul style="list-style-type: none"> <li>Designated nature conservation sites would not be affected by the development.</li> <li>The ecological value of nature conservation sites in the locality is likely to benefit from landscape scale effects of ecological enhancements carried out within the proposed development site.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would result in direct and indirect adverse impacts upon a locally designated nature conservation site.</li> </ul>	<ul style="list-style-type: none"> <li>Designated nature conservation sites would not be affected by the development.</li> </ul>	<ul style="list-style-type: none"> <li>Designated nature conservation sites would not be affected by the development.</li> </ul>
<ul style="list-style-type: none"> <li>Protect and enhance priority habitats, and the habitat of priority species</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon Priority habitats or species would result from the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would result in direct and indirect adverse impacts upon several Priority Habitat types as listed within the UK Biodiversity Action Plan.</li> <li>Adverse direct and indirect ecological impacts on habitats within and adjacent to the development site has the potential to impact upon several Priority Species of wildlife as identified within the UK Biodiversity Action Plan.</li> </ul>	<ul style="list-style-type: none"> <li>Direct adverse impacts upon Priority habitats or species are unlikely to result from development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>Direct adverse impacts upon Priority habitats or species are unlikely to result from development of the site.</li> </ul>
<ul style="list-style-type: none"> <li>Achieve a net gain in biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities through habitat creation within the ecological protection buffer and landscape design proposals would support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the Solent Business Park allocation site has the potential for direct and indirect adverse impacts on a designated nature conservation site, Priority Habitats, notable and legally protected wildlife species.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for ecological enhancement through habitat creation within development proposals Could support ecological enhancement objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for ecological enhancement through habitat creation within development proposals Could support ecological enhancement objectives.</li> </ul>

<b>Sustainability Appraisal and Strategic Environmental Assessment</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
	<ul style="list-style-type: none"> <li>As the current ecological interest of the site is low, its development has the potential to deliver a high level of net gain for biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>Considering the magnitude of adverse ecological impacts associated with development of this site it would be difficult for its development to deliver net benefits for biodiversity conservation.</li> </ul>		
<ul style="list-style-type: none"> <li>Enhance biodiversity through the restoration and creation of well-connected multifunctional green infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> <li>Ecological enhancement within the proposed development site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>Considering the extent of direct adverse impacts of habitat loss that would result from development of this site, ecological enhancement proposals are unlikely to achieve ecological integration in terms of landscape scale habitat associations, ecological function and contribution towards biodiversity conservation objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>

<b>Sustainability Appraisal of the Fareham Draft Local Plan - Baseline Update</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
<ul style="list-style-type: none"> <li>Potential impacts on priority habitats, species and protected species</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon Priority Habitats, notable or legally protected wildlife habitats or species would result from the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would result in direct and indirect adverse impacts upon several Priority Habitat types as listed within the UK Biodiversity Action Plan.</li> <li>Adverse direct and indirect ecological impacts on habitats within and adjacent to the development site has the potential to impact upon several Priority Species of wildlife as identified within the UK Biodiversity Action Plan.</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon Priority Habitats, notable or legally protected wildlife habitats or species are likely to result from the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>No direct adverse impacts upon Priority Habitats, notable or legally protected wildlife habitats or species are likely to result from the proposed development.</li> </ul>
<ul style="list-style-type: none"> <li>Opportunities for biodiversity enhancement in the area, including at the landscape scale</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities would be taken through habitat creation within the ecological protection buffer and through landscape design proposals within the development site that support ecological enhancement objectives.</li> <li>Ecological enhancement within the proposed development site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>Considering the extent of direct adverse impacts of habitat loss that would result from development of this site, ecological enhancement proposals are unlikely to achieve ecological integration in terms of landscape scale habitat associations, ecological function and contribution towards biodiversity conservation objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.</li> </ul>

<b>Sustainability Appraisal of the Fareham Draft Local Plan - Baseline Update</b>				
<b><i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i></b>	<b><i>Little Park Farm</i></b>	<b><i>Solent Way Business Park, Rookery Avenue</i></b>	<b><i>Swordfish Business Park</i></b>	<b><i>Faraday Business Park</i></b>
<ul style="list-style-type: none"> <li>Effects on designated sites of nature conservation interest</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly affected by development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would result in adverse direct and indirect impacts upon a designated nature conservation site.</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly affected by development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>No designated nature conservation sites would be directly or indirectly affected by development of the site.</li> </ul>
<ul style="list-style-type: none"> <li>Potential impacts on hedgerows as important local biodiversity assets</li> </ul>	<ul style="list-style-type: none"> <li>No hedgerows would be adversely affected by development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>No hedgerows would be adversely affected by development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would not impact upon hedgerows of ecological importance.</li> </ul>	<ul style="list-style-type: none"> <li>Development of the site would not impact upon hedgerows of ecological importance.</li> </ul>
<ul style="list-style-type: none"> <li>Opportunities for tree planting and improved management of woodland</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities include the introduction of new wildlife habitats through tree planting which would include the creation of new woodland habitat and consolidation of existing broadleaved woodland that abuts the development site boundaries.</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement proposals for this site could include opportunities for tree planting.</li> <li>Development proposals for the site could include opportunities for ecological management of any woodland habitat patches retained within the development site.</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement proposals for this site could include opportunities for tree planting.</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement proposals for this site could include opportunities for tree planting.</li> </ul>
<ul style="list-style-type: none"> <li>Protecting and enhancing the area's green infrastructure network to support local and sub-regional biodiversity networks, improving connectivity for habitats and species, and providing health and wellbeing benefits to local communities</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement opportunities within the proposed development would consolidate the value of the development site as part of a local network of linear wildlife habitat corridors.</li> <li>Ecological enhancement within the site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>Considering the extent of direct adverse impacts of habitat loss that would result from development of this site, ecological enhancement proposals are unlikely to achieve ecological integration in terms of landscape scale habitat associations, ecological function and contribution towards biodiversity conservation objectives.</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are</li> </ul>	<ul style="list-style-type: none"> <li>Development proposals would have the potential for incorporation of new wildlife habitat features that could result in biodiversity conservation gain.</li> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are</li> </ul>

<b>Sustainability Appraisal of the Fareham Draft Local Plan - Baseline Update</b>				
<i>Synopsis of Local Plan Review objectives for ecology and nature conservation</i>	<i>Little Park Farm</i>	<i>Solent Way Business Park, Rookery Avenue</i>	<i>Swordfish Business Park</i>	<i>Faraday Business Park</i>
			more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.	more likely to introduce new interest to the landscape rather than integrate with existing biodiversity conservation features.
<ul style="list-style-type: none"> <li>Improved ecological networks will support biodiversity's adaptation to climate change</li> </ul>	<ul style="list-style-type: none"> <li>Ecological enhancement within the proposed development site will augment the ecological corridor function likely to be provided by adjacent linear habitats (railway corridor woodland and M27 embankment woodland corridor).</li> </ul>	<ul style="list-style-type: none"> <li>Considering the extent of direct adverse impacts of habitat loss that would result from development of this site, ecological enhancement proposals are unlikely to achieve ecological integration in terms of landscape scale habitat associations, ecological function and contribution towards biodiversity conservation objectives.</li> </ul>	<ul style="list-style-type: none"> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing ecological networks.</li> </ul>	<ul style="list-style-type: none"> <li>As the surrounding landscape generally lacks features of nature conservation importance development proposals that include ecological enhancement features are more likely to introduce new interest to the landscape rather than integrate with existing ecological networks.</li> </ul>
<ul style="list-style-type: none"> <li>Pressures on non-designated conservation sites and landscapes</li> </ul>	<ul style="list-style-type: none"> <li>No ecological interest sites outside those formally designated for nature conservation would be directly or indirectly affected by the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>Adverse direct and indirect ecological impacts on areas of land that are not included within nature conservation designations but contain habitat of biodiversity conservation interest will result from development of this site.</li> </ul>	<ul style="list-style-type: none"> <li>No ecological interest sites outside those formally designated for nature conservation would be directly or indirectly affected by development of this site.</li> </ul>	<ul style="list-style-type: none"> <li>No ecological interest sites outside those formally designated for nature conservation would be directly or indirectly affected by development of this site.</li> </ul>

<b>Fareham Draft Local Plan - Strategic Housing and Employment Land Availability Assessment</b>				
<i><b>Synopsis of Local Plan Review objectives for ecology and nature conservation</b></i>	<i><b>Little Park Farm</b></i>	<i><b>Solent Way Business Park, Rookery Avenue</b></i>	<i><b>Swordfish Business Park</b></i>	<i><b>Faraday Business Park</b></i>
<ul style="list-style-type: none"> <li>• Implications for international, national and local nature designations</li> </ul>	<ul style="list-style-type: none"> <li>• No designated nature conservation sites would be directly or indirectly affected by the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>• Development of the site would result in adverse direct and indirect impacts upon a designated nature conservation site.</li> </ul>	<ul style="list-style-type: none"> <li>• No designated nature conservation sites would be directly or indirectly affected by development of the site.</li> </ul>	<ul style="list-style-type: none"> <li>• No designated nature conservation sites would be directly or indirectly affected by development of the site.</li> </ul>
<ul style="list-style-type: none"> <li>• Implications for nature conservation sites when the land itself is not directly affected by development</li> </ul>	<ul style="list-style-type: none"> <li>• Indirect impacts upon woodland habitats and wildlife adjacent to the development site would be avoided by the establishment of a site perimeter ecological protection buffer.</li> </ul>	<ul style="list-style-type: none"> <li>• Development of the site would adversely impact surrounding designated nature conservation sites, in particular through ecological effects of habitat fragmentation.</li> </ul>	<ul style="list-style-type: none"> <li>• As the development site is not in close proximity to any designated nature conservation sites its development would have no implications for nature conservation sites beyond the development site boundary.</li> </ul>	<ul style="list-style-type: none"> <li>• As the development site is not in close proximity to any designated nature conservation sites its development would have no implications for nature conservation sites beyond the development site boundary.</li> </ul>



## Appendix E

*Railton*

**Railton TPC Ltd**, 41 York Road, Newbury, RG14 7NJ T: 07500 557255 E: brbamber@hotmail.com

**Railton TPC Ltd**, 41 York Road, Newbury, RG14 7NJ T: 07500 557255 E: brbamber@hotmail.com

## Fareham Local Plan 2037: Regulation 19 Consultation

### Representations on Policies E1, E2, E3 and E4

---

Project: Fareham Local Plan

Subject: Employment Allocations

Client: Frobisher Ltd

Prepared by: Bruce Bamber, Director Railton TPC Ltd

Date: 01/12/2020

---

#### Introduction

1. These representations have been prepared on behalf of Frobisher Ltd in relation to the proposed employment land strategy set out in the Regulation 19 version of the Fareham Local Plan 2037.
2. The current proposed strategy concentrates employment allocations at Faraday and Swordfish Business Parks at Daedalus and Solent 2 Whiteley. It is considered that the proposed allocations allow insufficient flexibility, lack opportunities for sustainable travel and risk leading to adverse transport and air quality impacts.
3. The proposed allocations are considered in turn before considering the potential benefits of the Little Park Farm site as part of the overall employment allocation strategy.
4. **Figure 1** shows the currently proposed sites and the Little Park Farm site in the wider context of the Borough.

#### Daedalus, Faraday Business Park (Policy E2)

5. The Faraday Business Park lies on the eastern side of Solent Airport. There is no train station serving the site and no regular bus service passing the site. The amount of residential area within walking distance of the site is limited by the presence of the airfield and essentially comprises the northern part of Lee-on-Solent. Some provision is available for trips by bicycle but this mode has the potential to cater for only a very small proportion of overall travel.
6. The site is unlikely to contribute towards a reduction in the overall need to travel as a result of its location in the far south-east of the local authority area requiring a relatively long journey through the area to access the wider strategic highway network including the M27.
7. The site's poor level of sustainable access is reflected in its 'negative' rating for Objective 4, '*To promote accessibility and encourage travel by sustainable means*' (as set out in the Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036: Site Options Assessment).
8. The route between the site and the north-east comprises the B3385 and Newgate Lane that lead to a 1km section of Gosport Road south of the A27 that is currently designated as an Air Quality Management Area (AQMA) (see **Figure 1**). The vast majority of vehicle movements between the site and Fareham, Portsmouth and other areas accessed via the M27 east will pass through this sensitive AQMA.

9. The Stubbington Bypass, that is currently being constructed, offers an improved route between the site and the A27 to the north-west. However, strategic transport modelling undertaken by Systra to support the Local Plan (Fareham Local Plan – SRTM Modelling, Systra, January 2020) identifies a number of junctions along both the B3385 corridor to the north-east (leading to M27 J11) and the B3334/A27 corridor to the north-west (leading to M27 J9) that are identified as congested (see **Figure 1**). Development in the vicinity of Solent Airport will generate additional traffic on both of these routes and thus adversely impact on these sensitive junctions.

#### **Daedalus, Swordfish Business Park (Policy E3)**

10. The Swordfish Business Park lies on the northern side of Solent Airport. There is no railway station serving the site. A bus service passes the site with a current frequency of seven services in each direction per day. Although the presence of the airfield limits the amount of residential area surrounding the site, the majority of Stubbington lies within reasonable walking distance. There is some scope for trips to be made by bicycle.
11. As with Faraday Business Park, the site is unlikely to contribute towards a reduction in the overall need to travel as a result of its location in the far south-east of the local authority area requiring a relatively long journey through the area to access the wider strategic highway network including the M27.
12. The site is given a 'positive' rating for Objective 4 in the Sustainability Appraisal, presumably reflecting a higher level of bus and pedestrian accessibility.
13. The site also benefits from the Stubbington Bypass but development in this location will also generate traffic through the AQMA area for those trips to and from areas to the north-east, Fareham and Portsmouth. The route also passes through a number of junctions that are or are predicted to be congested in the future as shown on **Figure 1**.

#### **Solent 2 (Policy E4)**

14. The site is located to the north of the M27 and is therefore likely to generate a significant number of vehicle trips crossing the motorway junction to access the wider higher network within the Borough.
15. The site lies within walking and cycling distance of residential areas around Whiteley but has poor pedestrian access to the larger residential areas to the south of the motorway. The site is within walking distance of a bus service (5 services per day in each direction) and offers the potential for employees to use Swanwick railway station (0.8 mile walk). The site is given a neutral rating for sustainable access in the Sustainability Appraisal.
16. It is noted that the section of Rookery Avenue from which vehicle access is proposed lies immediately to the south of Whiteley Primary School. Rookery Avenue is used by parents when dropping off and picking up children. The intensification of the use of the road for employment and industrial uses is likely to lead to conflict between HGV traffic and vulnerable highway users associated with the school. Policy E4 is currently silent on this potential conflict.

#### **Comment on Current Strategy**

17. The proposed employment allocation strategy relies very heavily on sites around Solent Airport. This location does not provide high levels of transport sustainability since there are limited areas of residential development within walking distance of the sites, there is no potential for train travel and bus access is either limited or absent. Further, the sites, being located at the far south-east of the Borough, do not minimise the need to travel and will inevitably lead to longer vehicle trips for those seeking to access the strategic highway network, particularly the M27. Despite the Stubbington Bypass offering relief to Stubbington Village, the sites around the airport will generate additional traffic along the congested routes leading to Junctions 9 and 11 of the M27 with the route to the east also passing through the sensitive Gosport Road AQMA.
18. The Solent 2 site offers some advantages in terms of access to a railway station and more direct access to the motorway but suffers from poor pedestrian access to the large residential areas to the south of the motorway and generates vehicle trips across the motorway junction to access the bulk of the Borough. The site also raises a concern about conflict with the use of Rookery Avenue by parents and children accessing Whiteley Primary School.
19. It is concluded that in transport terms, the proposed employment strategy is inflexible, fails to minimise the need to travel and offers only limited opportunities to travel by sustainable modes.

#### **Little Park Farm, Park Gate (id. 3015)**

20. The Little Park Farm site was previously included within the employment allocation strategy but has now been omitted.
21. The site lies just to the south of the motorway adjacent to the existing Segensworth West employment area. The site benefits from proximity to large residential areas to the south, facilitating pedestrian access, a good quality pedestrian and cycle route to Swanwick railway station that would be further enhanced as part of site development and access to bus services that currently serve the Segensworth West employment area. The site is given a neutral rating for sustainable access although it is clear from the above assessments that the site is at least as sustainable as the most accessible sites currently included as allocations.
22. It is inevitable that some traffic from the site would impact on sensitive or congested junctions within the Borough, however, the site's location reduces its impact on congested routes and junctions and reduces the overall need to travel within the Borough and to access the strategic network compared with the current allocations.

#### **Conclusion**

23. With the above assessments in mind, it is considered that the Little Park Farm site offers a high level of pedestrian access to major residential areas to the south of the motorway, benefits from a level of bus access equivalent to the highest level available at the currently proposed sites, offers better access to a railway station than any of the currently proposed sites, allows access to most of the Borough without the need for vehicles to cross the motorway junction and offers direct access to the motorway, if required, with the need to negotiate only one junction on the A27.

24. On the basis of the above, it is concluded that the employment allocation strategy would benefit from greater flexibility and the inclusion of the Little Park Farm site that, in transport and transport sustainability terms, offers significant benefits compared with the currently proposed sites.





## **Memorandum / Preliminary Briefing Note**

**Date: 02.12.2020**

**Solent 2, J9/M27, Solent Business Park, Whiteley, Hampshire**

### Background

Solent 2, in its original form and all under the ownership of Arlington Securities, comprised the majority of the residual undeveloped commercial land at Solent Business Park. It was/is split into two parts straddling the Winchester City Council (WCC) and Fareham Borough Council (FBC) administrative boundaries. The whole totals some 35 acres of land. Some 20 acres lie in WCC with the balance of 14.5 acres in FBC.

The two parts of Solent 2 are shown on dwg. no. 3791.19.A, with Little Park Farm (LPF), for marketing purposes we refer to as "Segensworth North-West", also shown, at that time euphemistically referred to as Solent 3. A small part of the FBC land is shown inside the broken red site delineation, used for a drainage balancing pond.

The Solent 2 WCC land was acquired by Frobisher Ltd. (FL), for JSD the then commercial development subsidiary of J Sainsbury, acting as their development manager. With most of Frobisher's file records on this now shredded, chronology of the acquisition timeline is from my recollection and somewhat incomplete electronic file records.

At the time of the FL/JSD acquisition of the WCC land, from recollection early in 2003, FL/JSD declined to purchase the FBC land which, even back in 2002, had major problems with necessary infrastructure diversions and the extensive maturing flora and fauna, making it evident that the floor area capacity allocated and approved under an extant Outline Planning Consent, was unachievable, on which I comment in detail below.

During 2004 J Sainsbury went through a major corporate restructure in which many non-core businesses were sold away. As part of this restructure JSD was sold to Blue Capital, part of Catalyst and for whom FL continued as development manager. Blue Capital followed a strategy of site break-up into parcels for development by others, whether owner occupiers or 3<sup>rd</sup> party developers.

### FBC Land Development Capacity

Again from recollection, at the time of grant of the currently extant Outline Planning Consent on the FBC land, development of Solent Business Park was restricted by both WCC and FBC to B1a use. A copy of the website brochure issued by JSD for this form of development is attached. On the southern part of the WCC land this changed and from 2006 onward planning consents were granted by WCC for B1c, B2 and B8 "shed uses", also reflected in the present FBC allocation of Solent 2.

The demand in the area is for industrial and warehousing "sheds", accepted in the move toward this type of development on the WCC land, now followed by FBC. Following any current commercial and/or institutional funding yardstick, 23,500m<sup>2</sup> / 253,954 sq.ft. reflecting a density of 39.8% on the gross area won't in reality fit on to the FBC part of Solent 2.

In 2002 FL undertook a study for JSD to see what capacity of B2/B8 development could be accommodated on the FBC land. Proposal 1 attached, ignores site constraints of the SINC, flora and fauna and the necessity to move the major 600mm water service transmission main together with other utilities running through the site as per Solent 2 Infrastructure Plan PBA dwg.no. 3391/007/SK43.A.

Notional Capacity:

Based on Proposal 1 the maximum notional floor area that can be accommodated comprises circa 18,500m<sup>2</sup>/200,000sq.ft., approximately 75% of the FBC quantum allocated. This is however an artificial review as one cannot ignore the maturing SINC and flora and fauna, now advanced by a further two decades of growth since this review. Whilst needing corroboration, as I understand it this site has remained untouched over this period. As a result, the actual capacity will inevitably have been significantly eroded.

Current Development Capacity:

Simpson Hilder Associates (SHA) have been asked to revisit Proposal 1 study and advise FL on the current likely development capacity; preliminary findings are set out below.

SHA Indicative Site Layout (3), copy attached, indicates that development capacity of the site, if working around the encumbrances' referred to above is likely to be no more than 13,170m<sup>2</sup>.

Site layout (3) has not made any specific provision to changes imposed by the SINC designation and other development policy restraints that have emerged over the last 15 years.

The principle impediment, aside from the generality of the above, is the 600m water main which also bisects LPF, albeit in a much less intrusive manner. The wayleave for this on LPF is recited below:

- 7-12m per side stand off distance requirement by the water authority
- Not to stack any heavy or bulky objects or materials or to construct any building road path drain or structure of any sort over the pipe or in close proximity to it so as to interfere with access to it
- Not to raise or lower the level of the ground in any way which might affect the depth of cover over the said pipe

The stand-off distance of between 7 and 12m has been allowed at 12m. We believe this to be a reasonable assumption, but site-specific searches will be necessary to confirm this.

There is a likely differential of development floor space between the Proposal 3 offset and that of the wayleave offset of some 1,280m<sup>2</sup>.

#### Market Perception of Solent 2

Solent 2, with an extant outline planning consent, has been languishing in the local market, undelivered, for significantly longer than LPF.

A summary of the market weaknesses of Solent 2 FBC land, in the context of the current allocation is broadly:

- The site is too far along Rookery Avenue to cope with HGV traffic that will be generated on some scale

- Rookery Avenue, as an access, already suffers from congestion in the rush-hour, spilling in and out from the adjacent residential areas and the hotel
- The ecological issues and associated costs are seen as challenging, exacerbated by the ancient woodland affecting the manner and ease of development
- Whiteley seen by industrial and warehouse users and investors as a less suitable location than the Segensworth business area
- Solent 2 is, at best seen as a possible small unit development area, working within its spatial impediments

## Appendix F

## Appendix G

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>1</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

# Hayling Farm Underbridge

SDP1 11m 2ch

Bridge Underpinning, Soil Nailing &amp; Carriageway Lowering

NR/L2/CIV/003/F001

## Revision History

Edition	Description	Prepared		Checked		Approved	
		By	Date	By	Date	By	Date
1	First Issue	WD	13/9/2019	JCR	13/9/19	JCR	13/9/19

Document: 18-018B-FRM-001



PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page 2 of 11
GRIP Stage	4	Date	13/09/2019	

Project Title	Hayling Farm Underbridge		
Project Nr	18-018B		
Location	Hayling Farm Underbridge, Little Park Farm Road, Fareham, Hampshire		
ELR	SDP1	Mileage	11m 2ch
Asset Nr	E15/37	OS grid ref	SU 523 085
RRD Reference Nr	Not applicable		
DRRD Reference Nr	Not applicable		
CR-T Reference Nr	Not applicable		
Other AiP documents associated with this submission	Not applicable		

## PART 1: DETAILS

### 1.1 Existing Structure

The existing railway bridge over Little Park Farm Road is a brick masonry arch structure supporting two railway tracks between Fareham Junction and Swanwick Station. The abutments, wingwalls, spandrels and parapet are all of brick masonry construction. The Network Rail reference for the structure is bridge number E15/37 on ELR SDP1 11m 2ch.

Little Park Farm Road is the only access to a large area of land that is to be developed for commercial use. The current clearance below the structure prevents this development from being viable.

The semi-circular arch spans approximately 3.65m, reducing the width of Little Park Farm Road to a single lane beneath the bridge, and has a rise of 1.83m from the springing. The reported headroom clearance above existing ground level is 4.22m at the centre of the arch and 2.25m at the arch springing. Network Rail records indicate the length of the arch to be 8.38m.

Evidence of previous strengthening works in the form of tie bars to the spandrel walls was observed to the structure. The mortar joints throughout have been recently repointed. The current condition of the bridge is fair with signs of minor spalling to the arch rings and abutments.

A trial pit investigation was undertaken on the 7/10/2015 to determine the level of the existing foundations and if a structural slab or abutment-to-abutment propping exists in the invert. It was concluded that there is no structural slab, or abutment-to-abutment propping in the invert below the structure. See Hayling Farm Ground Investigation Report R14-311G for further details. A layer of compacted gravel formation, adjacent to the abutments was located at a depth of approximately

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

## NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page 3 of 11
GRIP Stage	4	Date	13/09/2019	

900mm at the downside and approximately 600mm at the upside, ie: the observed foundation level of Hayling Farm Bridge. No compacted gravel was located in the centre of the invert which suggests the compacted gravel has been used locally at the mass abutment foundations only. The invert level reduces by approximately 300mm from Downside to Upside of the structure, accounting for the formation level differences described.

### 1.2 Proposed Works

The proposed works involve lowering the existing road surface on the invert, below the structure, and installing a new flexible pavement at the lower level, to increase the existing headroom for HGV traffic.

Traffic management will be installed at either end of the bridge to only allow single direction traffic flow at any one time. To further minimise any risk of bridge strikes it is proposed to install a physical traffic warning on the bridge approach road, at the start of Little Park Farm Road, adjacent to Dewar Close roundabout, in the form of a goal post-type frame to warn oversized traffic. Sufficient turning space will be included in the highway design to allow these vehicles to manoeuvre and return.

It is proposed to underpin the bridge abutments with reinforced concrete foundations, and further laterally stabilise the bridge abutments with ground anchors near their bases to replicate the passive resistance of the removed soils. A detailed underpinning methodology will need to be developed as part of the detailed design.

Ground anchors are proposed to maintain the stability and integrity of the bridge. Indicative lengths of 7-10m (bonded length) are initially proposed, with horizontal spacings of 1.5m between anchors. The exact specification of the anchors will be confirmed at detailed design stage.

### Suggested sequence of works

The suggested sequence of works for the installation of ground anchors is as follows:

- Mobilise to site;
- Prepare site for installation (vegetation clearance, temporary works, etc);
- Drill hole for installation of ground anchors (required diameter/length to be confirmed);
- Install and grout ground anchors;
- Place facings as required;
- Sacrificial testing of ground anchors

The suggested sequence of works for the installation of abutment underpinning is as follows:

- Mobilise to site;
- Excavate existing road surface down to proposed levels.

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page 4 of 11
GRIP Stage	4	Date	13/09/2019	

- Following a 'Dig 1 – Miss 2' methodology for the construction of the underpinning bays:
  - Excavate out foundation material beneath existing bridge foundations;
  - Pour concrete foundation into underpin bay;
  - After appropriate curing time, move on to next underpin bay, as per 'Dig 1 – Miss 2'.

**Additional design / accompanying investigations / documents**

*The existing ground investigation data is no longer relevant for the proposed lowering of the road level. Therefore, further ground investigation should be completed prior to the detailed design stage. As a minimum, the following scope is recommended:*

- 2 No. boreholes to 6m below ground level (bGL) or practical refusal, located at either end of the bridge:
  - Undisturbed samples taken from approximately 1.5m and/or 2.0m bGL.
  - In-situ testing (standard penetration testing) throughout both boreholes.
  - Standard logging and sampling of soils to BS 5930.
- 2 No. concrete coring samples through the bridge sidewall to determine its thickness/make-up.
- 2 No. trial pits to 3-4m bGL in order to sample the underlying Made Ground and natural soils which will be excavated during the lowering of the bridge and roadway:
  - Contamination testing and Waste Acceptance Criteria testing should be completed on these soils to determine how they can be exported off site.
  - It is anticipated that these works could be completed with a mini excavator.

*Upon completion of further ground investigation works, this information will be incorporated into the Form F003 designs.*

*It is anticipated that in order to complete the ground investigation works, Little Park Farm road will need to be temporarily closed.*

**Temporary Works that will be required**

*The following temporary works may be required and are not included in this submission (note that the below list is not exhaustive, and further works not listed below may also be required):*

- Access scaffolding
- Vegetation clearance
- Temporary track and/or structure monitoring

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------


**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>5</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**1.3 Assets Affected (See Appendix A).**
*Asset No. 1 – Hayling Farm Underbridge, asset number E15/37*
**PART 2: DESIGNER'S SUBMISSION**

*I confirm that the criteria specified in NR/L2/CIV/003 have been considered and that the Design is submitted for Approval in Principle on behalf of Crouch Waterfall, 15 Apex Court, Woodlands, Bradley Stoke, Bristol, BS32 4JT.*

Signed		Title <b>Associate</b>
Name (print) <b>JOHN ROBERTSON</b>		Date <b>13/9/19</b>
To be signed by the Contractor's Responsible Engineer		

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>6</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**PART 3: PROJECT ENGINEER'S COMMENTS**

*I have considered this submission for Approval in Principle and I am satisfied that this has adequately addressed the criteria specified in NR/L2/CIV/003 and confirm that the Design of the Permanent Works is to be checked in accordance with the Design Check Categories listed in Appendix A of NR/L2/CIV/003.*

*My comments on the submission are given below. Provided that these comments are addressed, I hereby give Approval in Principle to the proposals.*

Signed	Title	Asset Protection Engineer
Name (print) Neil Jones	Date	22/07/2020
To be signed by the Project Engineer (Building and Civil Engineering)		

Signed	Title
Name (print)	Date
To be signed by other responsible person (if applicable) (Project Engineer (Building Services) for example)	

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>7</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**PART 4: ASSET MANAGER'S APPROVAL**

*I have considered the submission and confirm that this is approved subject to the comments given below being addressed within the Detailed Design.*

Signed	Title
Name (print)	Date
To be signed by the Asset Manager (Structures)	

Signed	Title
Name (print)	Date
To be signed by the Asset Manager (Geotechnical)	

Signed	Title
Name (print)	Date
To be signed by the Asset Manager (Drainage)	

Signed	Title
Name (print)	Date
To be signed by the Asset Manager (Buildings)	

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>8</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**APPENDIX A**
**A.1 LIST OF BUILDINGS AND CIVILS ENGINEERING ASSETS AFFECTED BY THE PROPOSAL**

- Asset No 1 – Hayling Farm Underbridge, SDP1 11m 2ch*

**ASSET NO 1**

Description	Hayling Farm Underbridge		
Location	Hayling Farm Underbridge, Little Park Farm Road, Fareham, Hampshire		
ELR	SDP1	Mileage	11m 2ch
Asset Nr	E15/37	OS grid ref	SU 523 085

**A.1.1 – DRAWINGS AND MODELS OF PROPOSAL**

Drawing No	Description	Revision
18-018B-DRG-001	Topographical Survey of Existing Bridge & Railway	A01
18-018B-DRG-002	General Arrangements of Existing Structure	A01
18-018B-DRG-003	Proposed General Arrangement	A01
18-018B-DRG-004	Ground Anchor and Faceplate Detail	A01
18-018B-DRG-005	General Notes	A01



PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page 9 of 11
GRIP Stage	4	Date	13/09/2019	

**A.1.2 – DESIGN CRITERIA**
**Design Life**

- 60 years for additional structural elements to bridge abutments
- 40 years for carriageway in accordance with HD26/06 Clause 2.27

**Loading requirements**
*Loads to be considered in design:*

- Rail load as per DMRB, BD 37/01 (50kN/m & 200kN point load);
- Earth pressure as a result of ballast and embankment fill. As no information is available on the materials used, the following parameters have been assumed:
  - Unit weight: 18kN/m<sup>3</sup>
  - Angle of shearing resistance: 28°

**Environmental requirements**

N/A.

**Materials to be used**

Element	Material	Exposure class
Dywidag bar anchor	Stainless Steel, grade TBC	XC2
Concrete grout	TBC	XC2

**Other**

N/A.

**A.1.3 – ANTICIPATED DEVIATIONS FROM STANDARDS (WITH JUSTIFICATION)**
*None anticipated.*

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>10</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**A.1.4 – GEOTECHNICAL CONSIDERATIONS**

*The trial pit investigation completed in October 2015 is of limited use for the proposed works. It is recommended that further investigation work be carried out prior to the finalisation of design. Information is required on the type of material underlying the existing foundations, as well as the make up and thickness of the bridge sidewalls.*

*All proposed design work is expected to be classed as Geotechnical Category 2 in line with BS EN 1997-1:2004. The selection of this category is on the basis that the structures in questions are conventional and the ground conditions are expected to be relatively simple.*

**A.1.5 – ACCOMPANYING DRAWINGS AND OTHER DOCUMENTS**

*List documents / drawings accompanying this form including reference numbers are the following:*

- Drawings – see Section A.1.1 above
- 18-018B-RAR-001 – Designer's Risk Assessment
- Ground Investigation Report R14-311G

**A.1.6 – OTHER RELEVANT INFORMATION**

*None.*

**A.1.7 – REQUIREMENTS FOR OPERATION, INSPECTION, MAINTENANCE, REPAIR, RENEWAL OR REMOVAL INCLUDING SPECIAL ACCESS ARRANGEMENTS**

*Access for repairs and maintenance will require installation of temporary works i.e. scaffold type structure.*

**A.1.8 – CHECKING CATEGORY**

*The Design of the Permanent Works is proposed to be checked in accordance with the following Categories in NR/L2/CIV/003.*

Description of asset	Permanent or Temporary Works	Design Check Category
Hayling Farm Underbridge	Permanent	CAT-II

PROJECT TITLE	Hayling Farm Underbridge	ELR and Mileage	SDP1 11m 2ch
---------------	--------------------------	-----------------	--------------

**NR/L2/CIV/003/F001: APPROVAL IN PRINCIPLE**

NR/L2/CIV/003/F001. Issue 3. December 2018

Document reference	18-018B-FRM-001	Revision	P01	Page <b>11</b> of <b>11</b>
GRIP Stage	4	Date	13/09/2019	

**A.1.9 – TEMPORARY WORKS**

*Access for repairs and maintenance will require installation of temporary works and submission of proposals to NR for acceptance under cover of a F002/F003. The following temporary works may be required and are not included in this submission (note that the below list is not exhaustive, and further works not listed may also be required):*

- *Detailed underpinning sequence;*
- *Access scaffolding;*
- *Vegetation clearance;*
- *Temporary track and / or structure monitoring;*

## Appendix H

# Segensworth North-West of Fareham: Review of HGV Access

## **Railton TPC Ltd**

**41 York Road**  
**Newbury**  
**Berkshire RG14 7NJ**  
**T. 07500 557255**  
**E. [brbamber@hotmail.com](mailto:brbamber@hotmail.com)**

Railton TPC Ltd ref:	NW Fareham 02B
Planning Inspectorate	Ref: N/A
Planning Authority	Ref: N/A
Date:	08/05/2019
Author:	Bruce Bamber BSc MA MSc CMILT MCIHT

## Table of Contents

1.	Introduction.....	1
2.	Height of HGVs.....	3
	Legal Position in UK .....	3
	Examples of Haulage Vehicle Heights .....	3
	Heights of other HGVs.....	4
	Other Height Options .....	6
3.	Summary and Conclusion.....	8

## 1. INTRODUCTION

- 1.1. This report has been prepared on behalf of Frobisher Developments Ltd to review the access constraints imposed by the railway underbridge that provides access to land lying between the railway and M27 at Segensworth, north-west of Fareham, Hampshire.
- 1.2. It is possible to provide a consistent clearance through the bridge of 3.87m without the need for significant engineering works. This option is referred to as '**the scrape**'. The clearance is based on a typical HGV width of 2.50m. The height does not allow for any safety margin. It is understood that the required safety margin is 75mm. The maximum permitted height of a vehicle of standard width passing under the bridge would therefore be 3.795m.
- 1.3. Crouch Waterfall has identified a scheme involving the lowering of the existing carriageway at the underbridge to provide a clearance envelope 2.5m wide (the width of a standard HGV) and 4.325m high. This option is referred to as '**CW1**'. The maximum permitted height of a vehicle of standard width passing under the bridge would therefore be 4.25m allowing for a 75mm safety margin. A vehicle with a high point greater than this but narrower and positioned in the centre of the vehicle would be able to pass under the bridge due to the shape of the arch.
- 1.4. An alternative scheme comprising underpinning and soil nailing allows the existing brickwork corbelling at the base of the bridge to be removed and provides a consistent clearance of 4.90m through the underbridge allowing the passage of a vehicle with standard width and a height of 4.825m again with a 75mm safety clearance. This option is referred to a '**CW2**'.
- 1.5. The purpose of this report is to assess the proportion of HGVs that would be able to negotiate the various bridge heights and to consider the merit in providing greater clearances through more significant engineering works.
- 1.6. It has been assumed that all data on vehicle heights refers to maximum unladen heights. Vehicles will tend to be lower when laden due to the effects of suspension and this would need to be taken into account when accessing the site.
- 1.7. There is no regular monitoring of the height of the national vehicle fleet. Vehicles are generally either categorised in terms of their overall weight and numbers of axles (since there are limits set for axle weight) or by overall length. Inventories are made of different categories of vehicle according to engine type/emissions but again there is no logical correlation between engine type and vehicle height. There is therefore no



definitive information available as to the overall proportion of the HGV fleet that would be unable to pass under a bridge with the various clearances. This report therefore considers typical heights of a range of vehicle types to provide some understanding of the degree to which the site would be constrained by each of the engineering options.

- 1.8. The author has undertaken observations adjacent to a major A road to provide some additional understanding of the current vehicle categories that are generally more and less than 4m in height.

## 2. HEIGHT OF HGVS

### Legal Position in UK

- 2.1. There is no legal limit on the height of vehicles in the UK, apart from buses. However, the maximum height of standard HGVs 4.95m since any vehicle with a height in excess of this will find it difficult to negotiate many routes with overbridges. The standard height of a motorway bridge is 5.1m. Any bridge less than 4.95m used by road vehicles is required to carry a sign indicating the minimum clearance available at the bridge.

### Examples of Haulage Vehicle Heights

- 2.2. The following table sets out the heights of a range of HGVs derived from information available on company websites and other sources. Each vehicle is colour coded to indicate whether it would be able to pass through either the scrape option (3.87m) or the CW1 option (4.325m) or if it would not be able to negotiate either:

*Table 2.1: Example Haulage Vehicle Heights*

Company	Vehicle Name/Type	Weight	Height
Eddie Stobart	HT Trailer	28t payload	4.63m
	Chilled variable double deck trailer	24t payload	4.87
	International ET Trailer	28t payload	4.00m
	Fuel Tanker	43,000l capacity	3.31m
	Retail Boxvan Tail Lift Trailer	-	4.23m
	Car Transporter*	8 cars	4.00m
	Chilled FST Fridge Trailer	28t payload	4.09m
	Convertible Double Deck Trailer	28t payload	4.62m
Shipleigh Transport	18 tonne rigid curtain-sider	18t	4.00m
	26 tonne rigid curtain-sider	26t	4.00m
	44 tonne artic.	44t	4.20m
Hunts Transport	9m curtain sided with tail lift	7.5t	3.50m
	10m curtain sided with tail lift	12t	3.75m
	10m curtain sided with tail lift	18t	4.03
	12m curtain sided with tail lift	26t	3.90m-4.10m
	16.5m curtain sided	44t	4.2m
S&K Haulage (Glamorgan) Ltd	UK standard curtainsiders	28t payload	4.2m
	European standard curtainsiders	28t payload	4.0m
	European standard euroliners	28t payload	4.0m
	Urban curtainsiders with taillift	23t payload	3.84m
	Tailboy curtainsiders	28t payload	4.6m

	General purpose liquid tankers	≤ 28t payload	3.9m
	Temperature controlled trailers	≤ 25t payload	4.0m
	Boxvan trailers	≤ 26t payload	4.0m
Container Transport	Container height 2.59m + 1.45m trailer height		4.04m
	Container height 2.90m + 1.45m trailer height		4.35m
<b>KEY</b>			
	Unable to negotiate either option		
	Able to negotiate CW1 option only		
	Able to negotiate both scrape and CW1 options		

\*other car transporters may have maximum loaded height in excess of 4.00m

- 2.3. It can be seen that almost all haulage HGVs have heights in excess of 3.87m (shown as orange or red). The payload limit for those vehicles that have heights less than 3.87m is around 12 tonnes. Standard transport containers loaded onto an HGV will have a height in excess of 4.0m.
- 2.4. A general purpose liquid tanker has been assumed to be accommodated by the lower bridge since its high point, although greater than 3.87 is positioned centrally on the vehicle and has a width less than 2.5.
- 2.5. The Freight Transport Association has stated that 80% of the UK semitrailer fleet has a height of 4.25m or more  
([http://www.fta.co.uk/export/sites/fta/galleries/downloads/trailer\\_height\\_briefing\\_note.pdf](http://www.fta.co.uk/export/sites/fta/galleries/downloads/trailer_height_briefing_note.pdf)).
- 2.6. The author has noted that almost all distribution vehicles used by the large national retailers and haulage companies have heights in excess of 4.0m. There were one or two exceptions but these were a very small minority.
- 2.7. It is concluded that a height restriction of 3.87m would prevent the vast majority of larger British haulage HGVs from accessing the site. However, a clearance of 4.0m with an additional safety margin would allow the site to be accessible by European standard height haulage HGVs.

#### Heights of other HGVs

- 2.8. The following table identifies the heights of a range of other HGVs. It should be noted that some vehicles are identified as being able to negotiate the lower height despite having a maximum height of more than 3.795m since the highest point is likely to be narrower than 2.5m and centrally located on the vehicle and thus able to pass under the higher central section of the bridge:

Table 2.2: Other HGV Heights

Vehicle Name/Type	Height
Concrete Mixer (6m3)	3.58m
Concrete Mixer*	3.81m
FTA Design Drawbar Vehicle	3.745m
50 tonne truck crane	3.65m
Tower crane	3.25m
Tower crane**	4.00m
Grab truck	3.70m
Tipper truck	3.50m
Cherry Picker	3.30m
Refuse vehicle	3.30m – 3.40m
Single deck bus	3.00m
Coach	3.50m
Rigid vans	3.60m (see text below)
Rigid vans (tall)	4.20m (estimate)
Fire appliance	3.40m
Skip loader (small)	3.68m
Skip loader (medium)	3.90m
Skip loader (large)	4.72m
<b>KEY</b>	
	Unable to negotiate either option
	Able to negotiate CW1 option only
	Able to negotiate both scrape and CW1 options

**Sources:** Internet and 'Designing for Deliveries' (FTA, August 1998)

\*height exceeds 3.795m but highest part of vehicle is centrally positioned

\*\*height exceeds 3.795m but design is likely to allow highest central structure to pass under higher section of bridge

- 2.9. The table shows that the vast majority of other HGVs would be able to negotiate the lower bridge height of 3.87m. The author has also observed a rigid van/lorry with a height of over 4.0m although the vast majority of rigid vehicles have heights less than 3.87m.
- 2.10. There appears to be little merit in increasing the height available under the bridge to more than 3.87m to accommodate non-haulage HGVs since very few exceed this height. There also appears to be little merit in reducing the height to less than 3.87m since this would compromise the safety margin available.
- 2.11. It appears that the majority of construction vehicles would be able to negotiate a bridge with a height of 3.87m. Most materials and equipment would be able to pass

under the bridge although it is not possible to say, at this stage, whether individual structures or pre-constructed components could be transported to the site.

- 2.12. It is noted that some tower cranes have a maximum width of around 3.0m. This width would also need to be taken into account when considering the ability to develop the site.
- 2.13. All service vehicles and emergency vehicles with standard dimensions would be able to pass under the bridge. The author observed a large post office rigid transport vehicle with a height in excess of 4.0m. However, this category of vehicle is unlikely to need to access an employment site.

#### Other Height Options

- 2.14. The discussion above indicates that neither the scrape nor CW1 options cater for all HGV types. The following table summarises the vehicle types that can be accommodated by the scrape and CW1 options but also includes a column relating to the CW2 option that provides for vehicles with heights up to 4.825m and one further option comprising an entirely new flat beam bridge with a clearance of 5.35m:

*Table 2.3: Vehicle Types Accommodated by Height Options*

Vehicle Name/Type	Height	Option			
		scrape	CW1	CW2	New bridge
		3.795m (3.87m)	4.25m (4.325m)	4.825m (4.950m)	5.275 (5.35m)
HT Trailer	4.63m	N	N	Y	Y
Chilled variable double deck trailer	4.87	N	N	N	Y
International ET Trailer	4.00m	N	Y	Y	Y
Fuel Tanker	3.31m	Y	Y	Y	Y
Retail Boxvan Tail Lift Trailer	4.23m	N	Y	Y	Y
Car Transporter*	4.00m	N	Y	Y	Y
Chilled FST Fridge Trailer	4.09m	N	Y	Y	Y
Convertible Double Deck Trailer	4.62m	N	N	Y	Y
18 tonne rigid curtain-sider	4.00m	N	Y	Y	Y
26 tonne rigid curtain-sider	4.00m	N	Y	Y	Y
44 tonne artic.	4.20m	N	Y	Y	Y
9m curtain sided with tail lift	3.50m	Y	Y	Y	Y
10m curtain sided with tail lift	3.75m	Y	Y	Y	Y
10m curtain sided with tail lift	4.03	N	Y	Y	Y
12m curtain sided with tail lift	3.90m	N	Y	Y	Y
12m curtain sided with tail lift	4.10m	N	Y	Y	Y
16.5m curtain sided	4.2m	N	Y	Y	Y

UK standard curtainsiders	4.2m	N	Y	Y	Y
European standard curtainsiders	4.0m	N	Y	Y	Y
European standard euroliners	4.0m	N	Y	Y	Y
Urban curtainsiders with taillift	3.84m	N	Y	Y	Y
Tailboy curtainsiders	4.6m	N	N	Y	Y
General purpose liquid tankers	3.9m	N	Y	Y	Y
Temperature controlled trailers	4.0m	N	Y	Y	Y
Boxvan trailers	4.0m	N	Y	Y	Y
Container ht 2.59m + 1.45m trailer ht	4.04m	N	Y	Y	Y
Container ht 2.90m + 1.45m trailer ht	4.35m	N	N	Y	Y
Concrete Mixer (6m3)	3.58m	Y	Y	Y	Y
Concrete Mixer	3.81m	Y	Y	Y	Y
FTA Design Drawbar Vehicle	3.745m	Y	Y	Y	Y
50 tonne truck crane	3.65m	Y	Y	Y	Y
Tower crane	3.25m	Y	Y	Y	Y
Tower crane	4.00m	Y	Y	Y	Y
Grab truck	3.70m	Y	Y	Y	Y
Tipper truck	3.50m	Y	Y	Y	Y
Cherry Picker	3.30m	Y	Y	Y	Y
Refuse vehicle	3.40m	Y	Y	Y	Y
Single deck bus	3.00m	Y	Y	Y	Y
Coach	3.50m	Y	Y	Y	Y
Rigid vans	3.60m	Y	Y	Y	Y
Rigid vans (tall)	4.20m	N	Y	Y	Y
Fire appliance	3.40m	Y	Y	Y	Y
Skip loader (small)	3.68m	Y	Y	Y	Y
Skip loader (medium)	3.90m	N	Y	Y	Y
Skip loader (large)	4.72m	N	N	Y	Y

\*the height does depend on the vehicles being carried although 4.0m is stated as the maximum loaded height for an Eddie Stobart car transporter

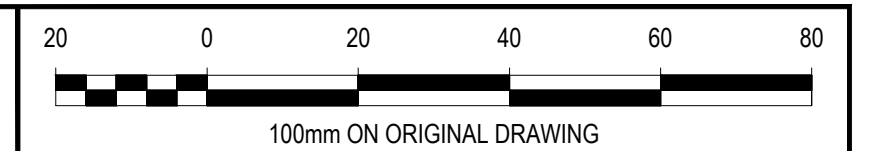
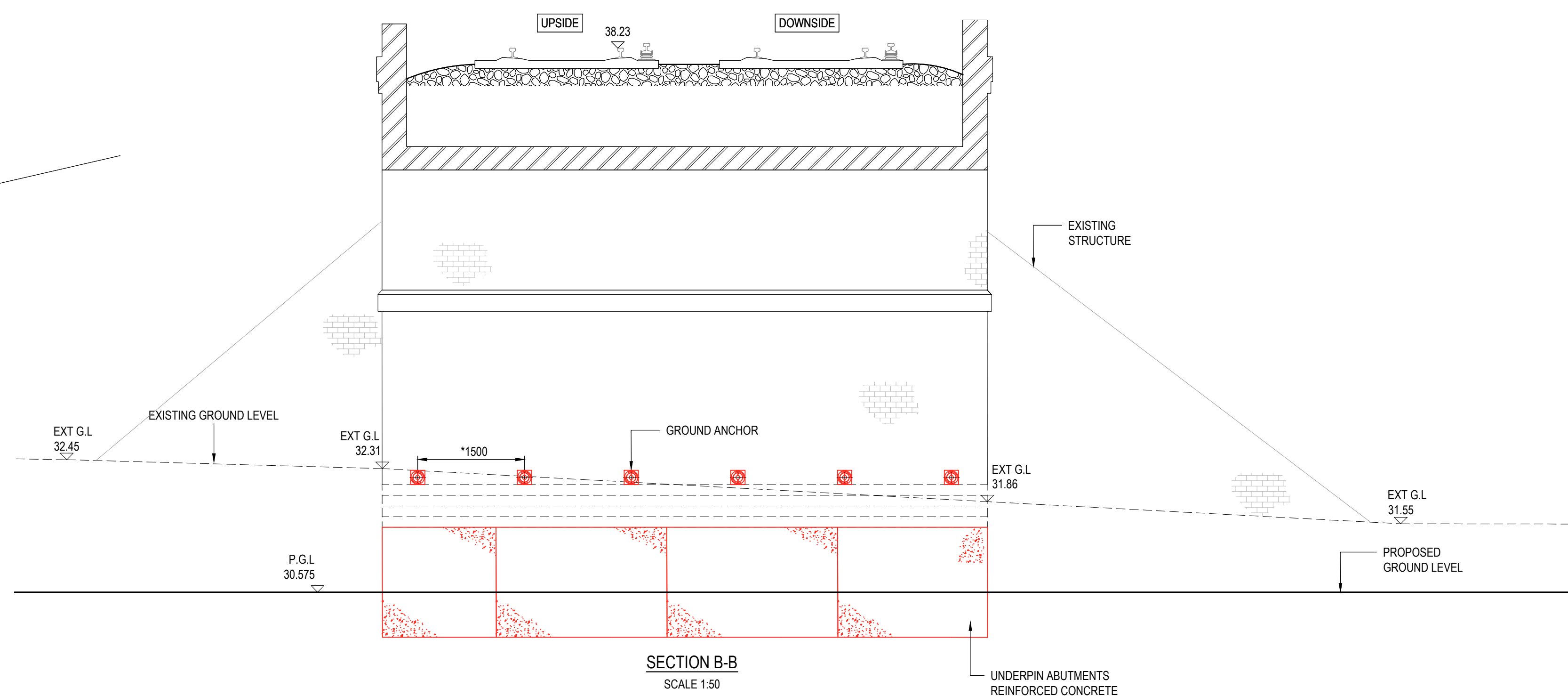
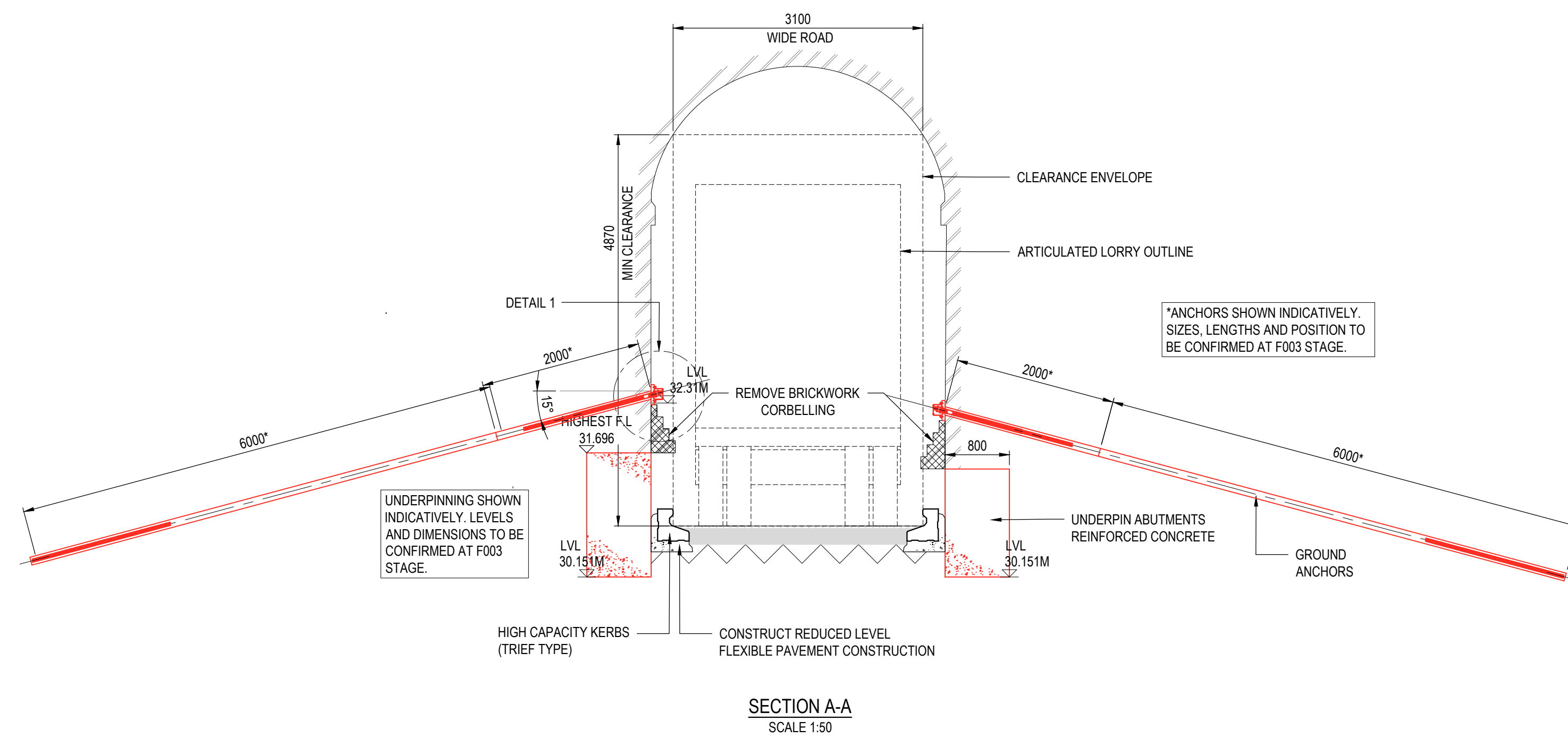
- 2.15. An available height of 4.25m (CW1 option) allows a number of additional vehicle categories to pass under the bridge compared with the 3.795m available height option (scrape) including European standard haulage vehicles and curtain-siders, liquid tankers, boxvan trailers and some skip loaders.
- 2.16. The CW2 option accommodates all specified vehicle types with the exception of the chilled variable double deck trailer.
- 2.17. The new bridge option accommodates all standard HGVs.

### **3. SUMMARY AND CONCLUSION**

- 3.1. It is clear from the information that is available that the site would be unable to accommodate any type of development that attracted large haulage vehicles (B8 warehousing and distribution) if the maximum height available under the bridge were 3.87m (scrape option). According to Freight Transport Association figures, 80% of the British semitrailer haulage fleet has a height of 4.25m or more. It is concluded that a significant proportion of large haulage HGVs would be unable to access the site with the scrape option.
- 3.2. All standard service and emergency vehicles would be able to negotiate a bridge with a height of 3.87m.
- 3.3. It appears that most non-haulage HGVs and LGVs have heights less than 3.87m. There are some exceptions to this but in these cases there generally appears to be some flexibility in the choice of vehicle that can be used. For example, some large rigid box vans are in excess of 3.87m in height but other versions with heights less than 3.87m are available that could presumably undertake the same functions.
- 3.4. On the basis of the above it appears that the site could accommodate a range of industrial types although it should be stressed that any potential occupier would need to be aware of the constraint and would need to assess the likely vehicle fleet that would be associated with the operations on site.
- 3.5. In terms of construction it appears that most construction vehicles would be able to negotiate the 3.87m bridge although, again, consideration would need to be given to the need to transport large non-divisible components or equipment to and from the site. The width of a tower crane may also constitute a constraint to development since tower cranes in transit exceed the standard HGV width (3.0m compared with a standard HGV width of 2.5m).
- 3.6. The CW1 option that provides a clearance of 4.325m is able to accommodate a number of additional vehicle types including European standard haulage vehicles and curtain-siders, liquid tankers, boxvan trailers and some skip loaders.
- 3.7. The CW2 option that provides a clearance of 4.95m is able to accommodate all the specified vehicle types with the exception of the chilled variable double deck trailer.







## NOTES

1. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES ABOVE ORDNANCE DATUM UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS AND LEVELS SHALL BE CHECKED ON SITE PRIOR TO ANY WORKS BEING PUT IN HAND.
4. THE CONTRACTOR IS RESPONSIBLE FOR THE STABILITY OF THE EXISTING STRUCTURE AT ALL TIMES DURING THE WORKS.
5. THIS DRAWING SHALL BE READ IN CONJUNCTION WITH ALL OTHER CONTRACT DRAWINGS AND RELEVANT STRUCTURAL SPECIFICATIONS.
6. ANY DISCREPANCIES BETWEEN THE INFORMATION GIVEN SHALL BE BROUGHT TO THE ATTENTION OF THE ENGINEER AS SOON AS POSSIBLE.
7. ALL MATERIALS USED IN THE WORKS SHALL BE TO BRITISH STANDARDS OR OTHER APPLICABLE SPECIFICATIONS.
8. ALL WORK IS TO BE CARRIED OUT TO B.S. CODES OF PRACTICE AND IN ACCORDANCE WITH GOOD WORKMANSHIP PRACTICE.
9. ALL PROPRIETARY MATERIALS USED IN THE WORKS SHALL BE USED IN COMPLETE ACCORDANCE WITH THE MANUFACTURERS RECOMMENDATIONS.
10. ALL BURIED, SURFACE AND OVERHEAD SERVICE INFORMATION CONTAINED WITHIN THIS DRAWING IS SHOWN INDICATIVELY. THE SERVICES SHOWN MAY NOT REPRESENT THE ENTIRETY OF ALL SERVICES THAT MAY BE ENCOUNTERED. ALL SURFACE INFORMATION SHOULD BE REFERRED TO PRIOR TO UNDERTAKING WORKS ON SITE. CROWN WATERFALL ACCEPT NO RESPONSIBILITY FOR OMISSIONS OR ERRORS IN THE POSITIONING OF THE SERVICES PRESENT ON SITE. REFER TO ALL RELATED ENGINEERING DRAWINGS, FORMS AND SPECIFICATIONS FOR FURTHER INFORMATION. REFER TO THE RESIDUAL/DESIGNERS RISK ASSESSMENT FOR ACTIONS TO MINIMISE AND MITIGATE RISK ASSOCIATED WITH KNOWN AND UNKNOWN SERVICES ON SITE

FORM 001

A01	FORM F001 ISSUE	KL	WD	JCR	13/09/19
REV	AMENDMENT	DRN	CHK	APP	DATE

Unit 15 Apex Court  
Woodlands  
Bradley Stoke  
Bristol  
BS32 4JT

Tel 01454 270 707  
office@crouchwaterfall.co.uk

CLIENT

FR  BISHIER

PROJECT TITLE	HAYLING FARM BRIDGE STR:E15/37 ELR: SDP1 MILEAGE:11M 2CH
---------------	--

DRAWING TITLE

PROPOSED GENERAL  
ARRANGEMENT

DRAWN	CHK	APP	DATE	SCALE
KL	WD	JCR	SEP' 19	AS SHOWN AT A1
JOB NUMBER		DRAWING NUMBER		REVISION
18018		003		A01

A prestigious new development by

# J Sainsbury Developments

20 acres providing

**20,000 – 420,000 sq ft  
of new business space**

a project by



**JSD**

J Sainsbury Developments Ltd

**Solent2 Business Overview** page 1 of 2

Solent 2, Solent Business Park is at the very hub of business locations in the Solent corridor. Situated midway between Southampton and Portsmouth it has excellent road links to the M3 (6 miles), mainline rail links to London Waterloo at Southampton Parkway (4 miles) and an International airport at Southampton (Eastleigh) Airport (4 miles).

More than 40 companies and over 3000 people enjoy the benefits and amenities of the site including the 111 bed Solent Hotel, Pub, Wine Bar, Whiteley Village Factory Outlet Centre and Supermarket and Petrol Station. Much residential development has also taken place around the park. Occupiers already present at Solent Business Park include Zurich, Kvaerner, Exxonmobil Chemicals, Norwich Union and Abbey National.

[forward to page 2 >](#)



Development Manager

**FROBISHER  
LIMITED**

a project by



**JSD**

J Sainsbury Developments Ltd



## Solent2 Business Overview page 2 of 2

[back to page 1](#) <

Solent 2 is a site extending to some 20 acres of developable land that has been purchased by JSD for the construction of a new fixed use Business Park adjoining the existing Solent Business Park. It is situated immediately adjacent to J9 of the M27 and is the closest available site to the Motorway junction.

Outline planning consent exists for the construction of up to 420,000 sq ft of B1 accommodation and the site is zoned for employment uses. JSD, in association with its development manager Frobisher Ltd, are now seeking expressions of interest from companies looking to acquire purpose built office and industrial premises on a freehold or leasehold basis. Sites may also be available, for sale.

The opportunity now exists with Solent 2 for your company to stamp its identity on their own building, or depending on scale, on the site itself.



Development Manager

**FROBISHER  
LIMITED**

a project by



**JSD**  
J Sainsbury Developments Ltd

## Solent2 Business Park Site Location

Strategically located mid-way between Southampton and Portsmouth, just off junction 9 M27, close to Solent Business Park.



Regional Map - Click for larger image



Local Map - Click for larger image



Site Map - Click for larger image

Development Manager

FROBISHER  
LIMITED

a project by



JSD

J Sainsbury Developments Ltd

## Solent2 Business Park Site Location

The plan below is an indicative scheme illustrating how accommodation might be arranged on the site



Aerial View - [Click for larger image](#)



Site Plan - [Click for larger image](#)

Development Manager

**FROBISHER  
LIMITED**

a project by



**JSD**

J Sainsbury Developments Ltd



## Solent2 Business Park Building

Computer rendering of proposed building style.



Building 1 - [Click for larger image](#)



Building 3 - [Click for larger image](#)



Building 4 - [Click for larger image](#)



Building 2 - [Click for larger image](#)



Building 3 - [Click for larger image](#)



Building 4 - [Click for larger image](#)

Development Manager

FROBISHER  
LIMITED

a project by



JSD  
J Sainsbury Developments Ltd

## Solent2 Business Park Contacts

Joint Letting/Selling Agents



Contact

Jeremy Braybrooke

jb@palmerfry.co.uk



Contact

Russell Mogridge

rmogridge@hughes-ellard.co.uk

\* The particulars given in respect of this property are believed to be correct but their accuracy cannot be guaranteed and they are expressly excluded from any contract.

Development Manager

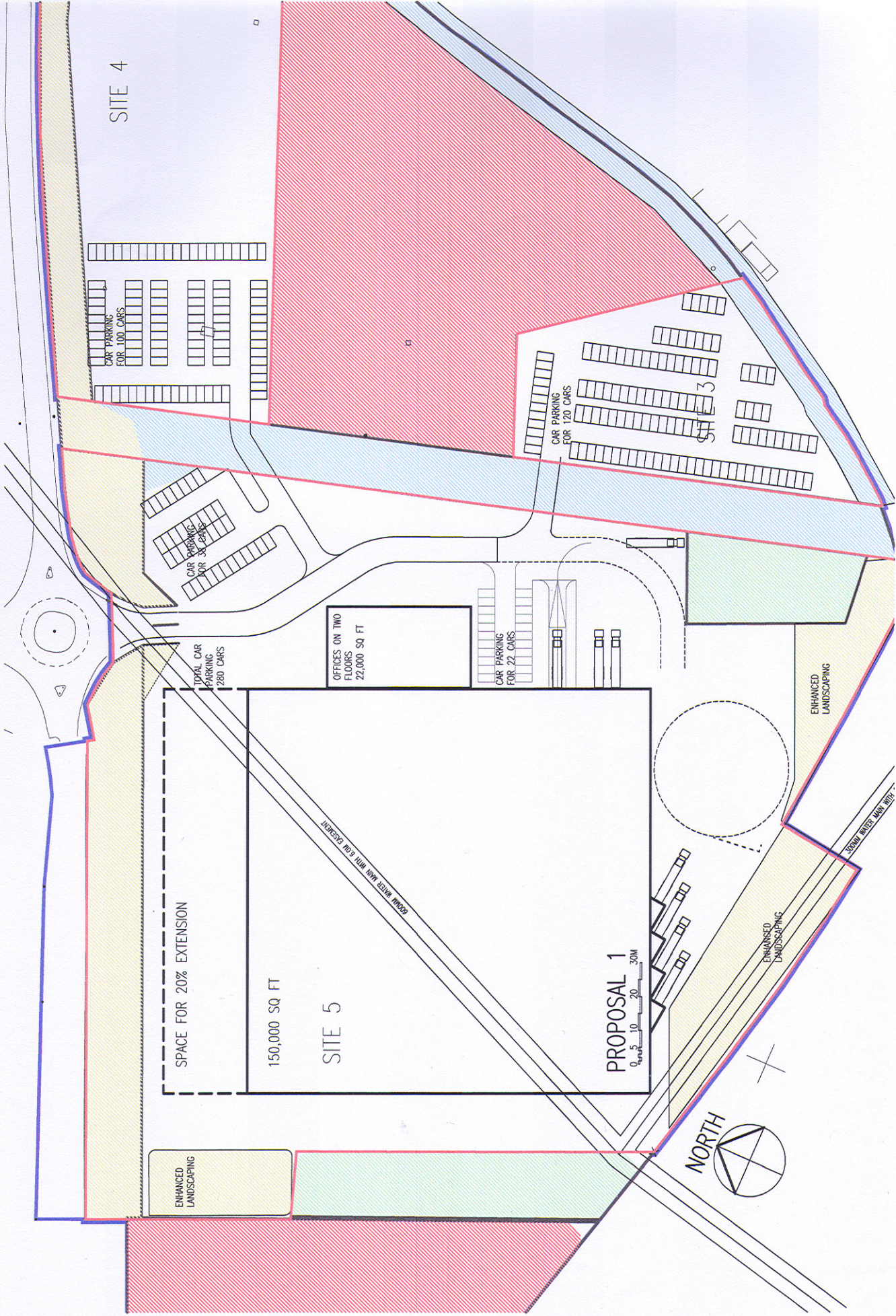
FROBISHER  
LIMITED

a project by



JSD  
J Sainsbury Developments Ltd



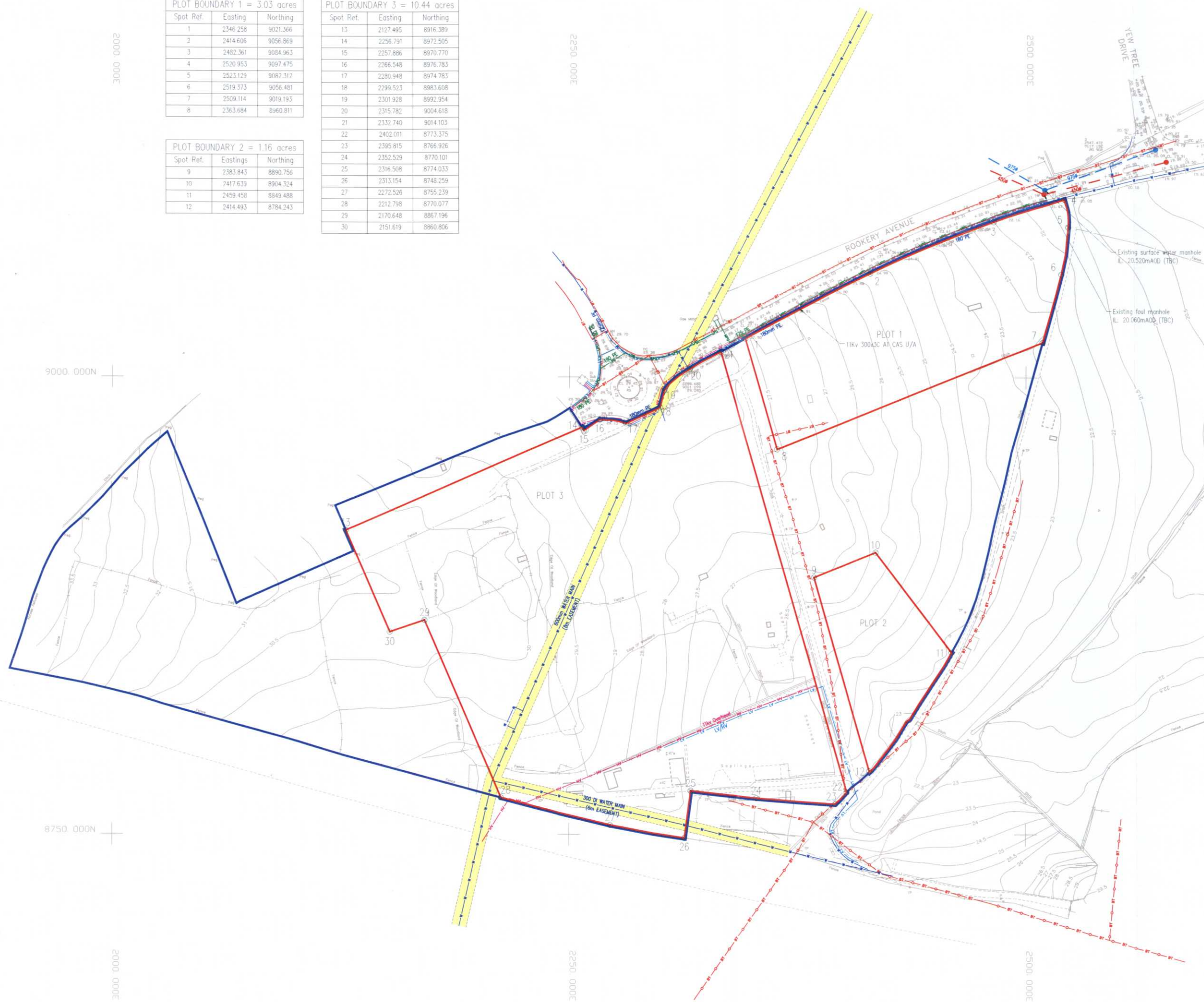




PLOT BOUNDARY 1 = 3.03 acres		
Spot Ref.	Easting	Northing
1	2346.258	9021.366
2	2414.606	9056.869
3	2482.361	9084.963
4	2520.953	9097.475
5	2523.129	9082.312
6	2519.373	9056.481
7	2509.114	9019.193
8	2363.684	8960.811

PLOT BOUNDARY 2 = 1.16 acres		
Spot Ref.	Easting	Northing
9	2383.843	8890.756
10	2417.639	8904.324
11	2459.458	8849.488
12	2414.493	8784.243

PLOT BOUNDARY 3 = 10.44 acres		
Spot Ref.	Easting	Northing
13	2127.495	8916.389
14	2256.791	8972.505
15	2257.886	8970.770
16	2266.548	8976.783
17	2280.948	8974.783
18	2299.523	8983.608
19	2301.928	8992.954
20	2315.782	9004.618
21	2332.740	9014.103
22	2402.011	8773.375
23	2395.815	8766.926
24	2352.529	8770.101
25	2316.508	8774.033
26	2313.154	8748.259
27	2272.526	8755.239
28	2212.798	8770.077
29	2170.648	8867.196
30	2151.619	8860.806



# KEY

	Ownership Boundary
	Plot Boundary
	Area of Easement
<b>Existing Services</b>	
	British Telecom
	HV Electric
	LV Electric
	Medium Pressure Gas Main
	Low Pressure Gas Main
	Water Supply
<b>Existing Drainage</b>	
	Foul Water Drain
	Surface Water Drain

# NOTES

1. All pipe sizes in mm unless noted otherwise

Mark	Revision	Drawn	Date	Chkd
A	Revised in line with comments by Arlington	pjd	27.01.05	Peter

**Utilities Note**  
The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake his own investigation where the presence of any existing sewers, services, plant or apparatus may affect his operations.

**Drawing Issue Status**

## SOLENT BUSINESS PARK SOLENT 2 INFRASTRUCTURE & CONSTRAINTS PLAN

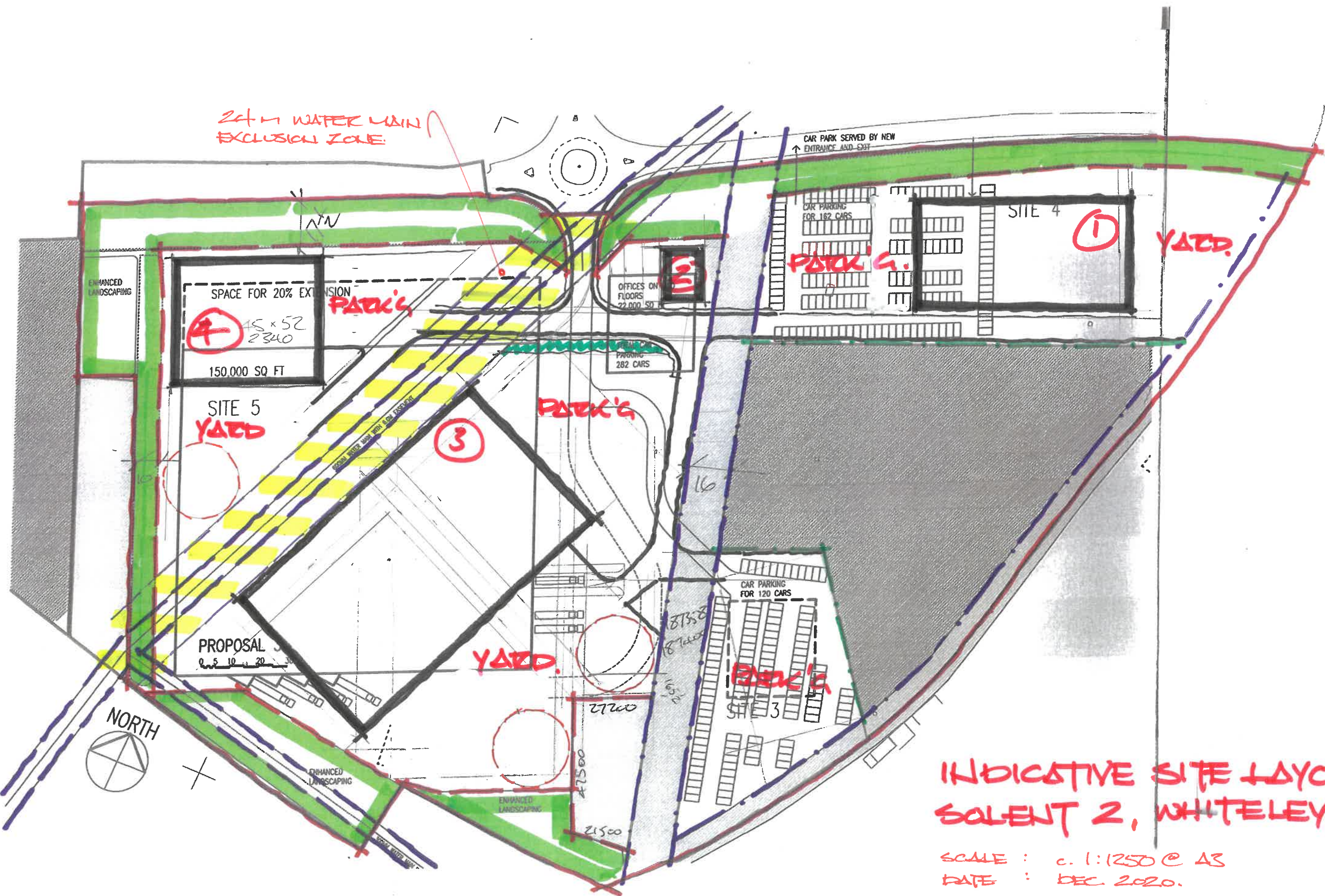
Client  
**ARLINGTON  
BUSINESS PARKS  
PARTNERSHIP**



PETER BRETT ASSOCIATES - CONSULTING ENGINEERS  
CAVERSHAM BRIDGE HOUSE WATERMAN PLACE READING BERKSHIRE RG1 8DN  
Tel: 0118 950 0761 Fax: 0118 959 7498 E-mail: reading@pba.co.uk Website: www.pba.co.uk © Peter Brett Associates

Date	Drawn by	Checked by	Drawing Number	Revision
Jan 05	pjd	PJD	3391/007/SK43	A
A1 Scale	1:1000			






INDICATIVE SITE LAYOUT (3)  
SOLENT 2, WHITELEY

SCALE : c. 1:1250 @ A3  
DATE : DEC 2020.



**Respondent details:**

Title:	Ms
First Name:	Charlotte
Last Name:	Mayall
Job Title: (where relevant)	Regional Planning Lead
Organisation: (where relevant)	Southern Water
Address:	
Postcode:	
Telephone Number:	
Email Address:	

**1) 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**

Southern Water is the statutory wastewater undertaker for Fareham East. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 20 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

**Your suggested revised wording of any policy or text:**

In consideration of the above, we recommend the following criterion is added to Policy FTC1; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

**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: 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**

Southern Water is the statutory wastewater undertaker for Fareham Station. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 120 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

**Your suggested revised wording of any policy or text:**

In consideration of the above, we recommend the following criterion is added to Policy FTC3; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

**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: FTC4 - Fareham Station West**



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

### Please provide details you have to support your answers above

Southern Water is the statutory wastewater undertaker for Fareham Station. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 94 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

### Your suggested revised wording of any policy or text:

In consideration of the above, we recommend the following criterion is added to Policy FTC4; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

### 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: HA1 - North and South of Greenaway Lane

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

### Please provide details you have to support your answers above

Southern Water is the statutory water and wastewater undertaker for Warsash. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 824 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

### Your suggested revised wording of any policy or text:

In consideration of the above, we recommend the following criterion is added to Policy HA1; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

### 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: 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

Southern Water is the statutory wastewater undertaker for Portchester. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 350 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

**Your suggested revised wording of any policy or text:**

In consideration of the above, we recommend the following criterion is added to Policy HA4; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

**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: HA17 - 69 Botley Road**

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

**Please provide details you have to support your answers above**

Southern Water is the statutory water and wastewater undertaker for Park Gate. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 24 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

**Your suggested revised wording of any policy or text:**

In consideration of the above, we recommend the following criterion is added to Policy HA17; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

**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**

Southern Water is the statutory wastewater undertaker for Portchester. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 60 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

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

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of foul flooding unless the requisite works are implemented in advance of occupation. This would not be consistent with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019), which requires planning policies to prevent new development from contributing to pollution of the environment. In addition, Paragraph 19 of the National Planning Practice Guidance (NPPG) states 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'

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

Our proposed modification would help to ensure the local Plan is sound by ensuring it is consistent with the above national policies and guidance set out in the NPPF and NPPG.

### **Your suggested revised wording of any policy or text:**

In consideration of the above, we recommend the following criterion is added to Policy HA44; 'Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.'

### **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:** Policy, Planning [REDACTED]  
**Sent:** 16 December 2020 09:20  
**To:** Planning Policy  
**Subject:** RE: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)

Dear Sir/Madam,

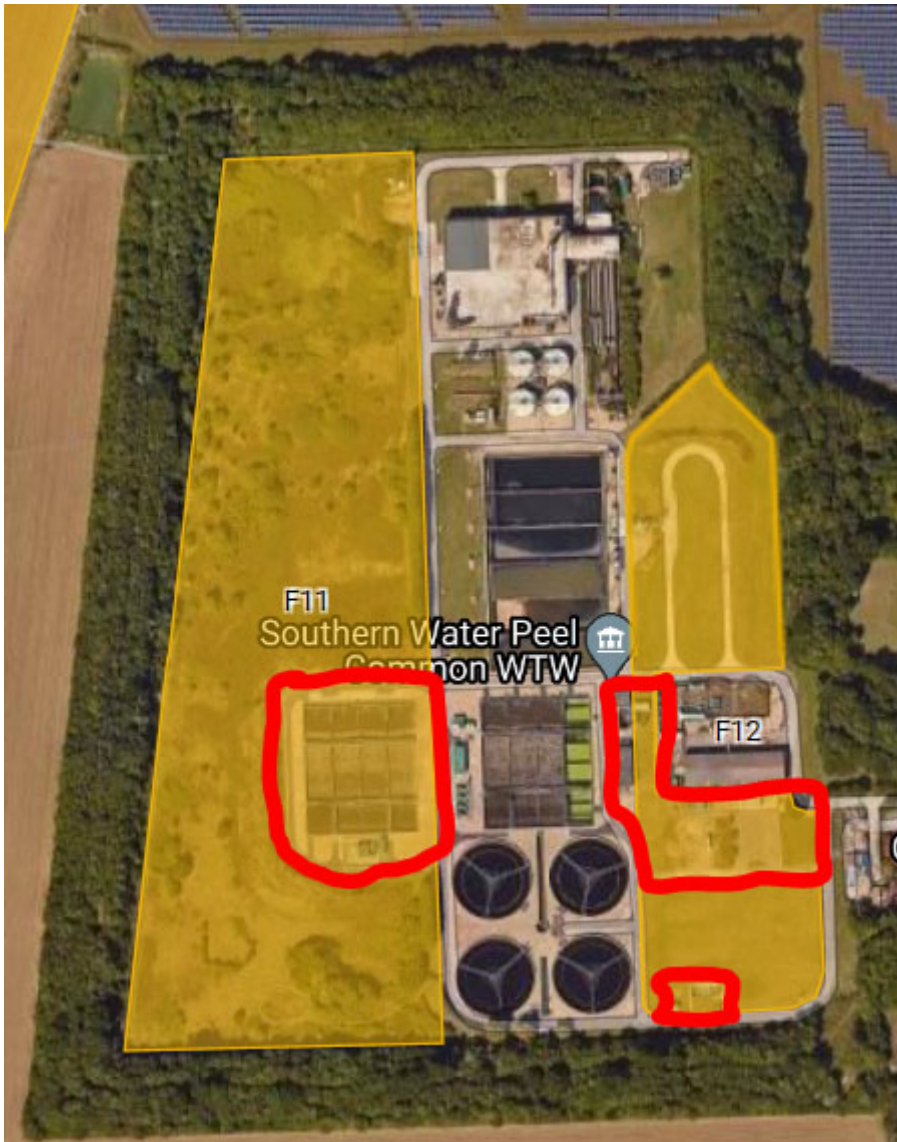
Thank you for your email below, inviting Southern Water to comment on the Fareham Local Plan.

We submitted our formal response online on 13 December, however an additional concern has been identified over the policy map associated with Policy NE5 Solent Wader and Brent Goose Sites relating to the designation of certain areas of Peel Common Wastewater Treatment Works as 'Low Use'.

Southern Water owns and operates the Wastewater Treatment Works at Peel Common, which provides wastewater treatment services for the whole of Fareham district and beyond. Whilst it may be the case that the birds use the quieter grassed areas of our site at times, we have concerns over part of the 'Low use' designation which includes operational structures. The Policy Map associated with the Local Plan does not provide sufficiently fine grained detail to identify that part of this designation overlays some operational areas. The map below is copied from the online map provided in the Solent Waders and Brent Goose Strategy (<https://solentwbgs.wordpress.com/page-2/>).

This enables you to see operational areas which we have circled red, within the yellow shaded area of the F11 and F12 designation boundaries. The area circled red in F11 contains aeration lanes, which are tanks filled with wastewater that is continually injected with air as part of the treatment process. The water in these tanks is non-buoyant as a result of the aeration process and as a result anything on the surface would sink to the bottom.





In addition, within area F12, we have highlighted two areas in red, the first at the southernmost edge being a UV treatment area, and the other larger area in the middle being a temporary contractor area, temporary treatment trial area and car park. The level of human and vehicle disturbance in these areas would be likely to make them unattractive to geese.

Whilst Southern Water wouldn't wish to threaten the habitat of these birds and supports the spirit of Policy NE5, we do not believe that these operational areas of Peel Common WTW qualify as a low use area - perhaps a more up to date survey is needed, or simply an adjustment of the boundaries of F11 and F12 to exclude the parts of the WTW that we have identified above.

We have made this comment separately to the local plan consultation, as it relates more to the SW&BGS document, which may require updating. However it was the local plan consultation that brought this matter to our attention.

We trust the above is in order but if you have any questions, or would prefer this comment to be submitted as a formal response to the Local Plan consultation, please let me know.

Yours faithfully,

**Charlotte Mayall**  
Regional Planning Lead  
Hampshire & West Sussex



---

**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 (6<sup>th</sup> November – 18<sup>th</sup> 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<sup>[1]</sup> 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](mailto: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:

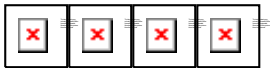
- ☐ Submission of the Fareham Local Plan to the Secretary of State for examination
- ☐ Publication of the recommendations of the person appointed to carry out the independent examination of the Fareham Local Plan on behalf of the Secretary of State
- ☐ Adoption of the new Fareham Local Plan

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



---

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.

Click [here](#) to report this email as spam.

---

This e-mail is intended solely for the person or organisation to which it is addressed. It may contain privileged and confidential information. If you are not the intended recipient, you are prohibited from copying, disclosing or distributing this e-mail or its contents (as it may be unlawful for you to do so) or taking any action in reliance on it. If you receive this e-mail by mistake, please delete it then advise the sender immediately. Without prejudice to the above prohibition on unauthorised copying and disclosure of this e-mail or its contents, it is your responsibility to ensure that any onward transmission, opening or use of this message and any attachments will not adversely affect your or the onward recipients' systems or data. Please carry out such virus and other such checks as you consider appropriate. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices. This e-mail is issued by Southern Water Services Limited, company number 2366670, registered in England and having its registered office at Southern House, Yeoman Road, Worthing, BN13 3NX, England. In sending this e-mail the sender cannot be deemed to have specified authority and the contents of the e-mail will have no contractual effect unless (in either case) it is otherwise agreed between Southern Water Services Limited and the recipient.

This message has been scanned for malware by Websense. [www.websense.com](http://www.websense.com)

---

<sup>[1]</sup> <https://www.legislation.gov.uk/ukxi/2020/731/introduction/made>

### Respondent details:

Title:	Mr
First Name:	Owen
Last Name:	Neal
Job Title: (where relevant)	Planning Manager
Organisation: (where relevant)	Sport England
Address:	
Postcode:	
Telephone Number:	
Email Address:	

### 1) 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

Sport England notes that the intention of the 2nd strand of policy R4 is intended to protect sports facilities under the heading of "community and leisure facilities". However, we consider that the policy should be amended to be consistent with para 97 of the NPPF which specifically relates to the exceptional circumstances in which sports facilities and land used for sport can be lost. The policy refers to circumstances in which loss of community or publicly owned or managed facilities are acceptable 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." Sport England considers that in respect of part i), it should be made clear that the lack of need for a facility should be supported by a robust assessment to make it consistent with national planning policy. In relation to part ii), Sport England would be concerned that the policy could allow for sports facilities to be lost as long as they were put to an alternative "community use". Sport England is not supportive of such an approach and again does not consider this consistent with para 97 of the NPPF. This specifically states that "the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." Sport England therefore considers that the policy should be clarified to ensure that sports facilities aren't lost to other community uses. In relation to part iii), again, we would question consistency with para 97 of the NPPF. Part (b) of para 97 refers to "the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;" The proposed policy wording refers to "any proposed replacement or improved facilities will be of equivalent or better in terms of quality, function and accessibility". We would therefore question the use of "function" in the proposed wording. It would mean that there is no reference to "quantity" within the criteria and would allow the loss of sports facilities or land for sport without them having to be replaced on an equivalent quantitative basis. Sport England does not support such an approach. In light of the above, we consider that the policy needs revising to bring it into line with national planning policy, particularly para 97. We therefore wish to object on this basis.

Sport England considers that the proposed policy is broadly sound, but that it could be improved to ensure consistency with national planning policy para 97.

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

I have set out in the previous section how Sport England considers the policy could be modified to make it sound.

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

As above, I have explained previously how the modifications could be made to ensure soundness.

**Your suggested revised wording of any policy or text:**

Please refer to the previous comments section.

**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: 9.129**

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

**Please provide details you have to support your answers above**

Sport England notes that the wording within this paragraph identifies that an exception to policy NE10 can be made where the disposal of surplus school playing field is secured under Section 77 of the Schools Standards and Framework Act 1998. Sport England has concerns with such an approach which would allow for the loss of playing field without consideration against our playing fields policy as well as national planning policy para 97. Sport England does not consider that such an approach is inconsistent with para 97 of the NPPF

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

Sport England considers that this paragraph should be removed or at least make clear that any loss is compliant with para 97 of the NPPF and Sport England's playing fields policy.

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

Please see above.

**Your suggested revised wording of any policy or text:**

Please 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:	Mr.
First Name:	Neil
Last Name:	Spurgeon
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

---

**1) Paragraph: 8.13**

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 very gratifying to finally have a categoric statement that should, given the very obvious flooding dangers in the two Strategic Gaps, ensure that, in perpetuity, these will remain as open spaces. it would therefore seem that there can now be no objections to changing the status of these two Strategic Gaps into Green Belt immediately

**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:** [REDACTED]  
**Sent:** 18 December 2020 22:17  
**To:** Consultation  
**Subject:** Representation about the Local Plan  
**Attachments:** response to Fareham Local Plan.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/ Madam,

I am attaching my response to the Local Plan. I tried to do this on a form but was unable to find a way of filling one in on a computer. I hope I have included all the necessary details.  
If not please get in touch.

Yours faithfully

Anne Stephenson



## **Fareham Local Plan Representation:**

Please note I tried to fill in an on line form but none of the links seemed to work or took me to a form which I couldn't type on to. I am therefore emailing my comments on a word document. If there is anything that is unclear then please get in touch.

**A1:** No Agent

**A2: Personal details**

Ms

Anne

Stephenson



**All representations are about whether the policy is Sound**

### **Strategic Priorities**

**2.12 The strategic priorities are not in the correct order and this is reflected in the structure of the report.**

The need to respond to the UK governments declaration of a Climate Emergency and to support it in reaching its commitments under the Paris agreement are alluded to but more as an afterthought rather than something that should be at the heart of planning. The need for an increase in green infrastructure and as a way to mitigate climate change and also improve the local environment needs to be more strategically planned and should be nearer the top of the priorities, as should the need for good design which will reduce carbon emissions and help to produce renewable energy. I think the design chapter should be up front as part of the development vision as should the idea of building a resilient community which is why Climate change should also be at the beginning of the report.

### **Housing Need and Supply:**

FTC2 Market Quay Development

g) It is important that any retail doesn't draw people away from the present shopping areas as at present there are empty outlets in the precinct. Any town square needs feel a safe space and should not detract from the present town square which already seems under used and a bit of a 'ghost town' feel at times. I acknowledge the mention of roof gardens and balconies and think it is important to incorporate a green feel to this area as I think this is lacking in the present town centre. Use of green walls, street trees, water features that will actually work and be enjoyed (I have never seen the only water feature in West Street ever in operation and have lived here for 20 years). For example fountains that come out of the paving in a 'random' way that children could play in. Bearing in mind the projections for climate change bringing dryer and hotter summer we need opportunities for people to enjoy cool and shady areas and areas with a green and natural feel are known to improve mental health.

FTC4 Fareham Station West

e) TPOs **must** be respected as mature trees are so important to maintain biodiversity and landscape value as even if trees are planted in their place it takes a long time for them to grow to replace properly mature trees that are felled. There should also be a 5 new for one policy to replace any trees felled and a requirement for any developer to maintain any trees planted for at least 3 years after planting.



#### HA1 North and South of Greenaway Lane

g) ) TPOs **must** be respected as mature trees are so important to maintain biodiversity and landscape value as even if trees are planted in their place it takes a long time for them to grow to replace properly mature trees that are felled. There should also be a 5 new for one policy to replace any trees felled and a requirement for any developer to maintain any trees planted for at least 3 years after planting.

#### HA7 : Warsash Maritime Academy

j) TPOs **MUST** be respected as mature trees are so important to maintain biodiversity and landscape value as even if trees are planted in their place it takes a long time for them to grow to replace properly mature trees that are felled. There should also be a 5 new for one policy to replace any trees felled and a requirement for any developer to maintain any trees planted for at least 3 years after planting.

m) Flood risk: considering the site this should be a much higher priority in the planning process. Is this actually a realistic site for development considering projected sea level changes and increasing likelihood of storms etc. affecting tidal areas?

#### HA9 Heath Road

f) TPOs **MUST** be respected as mature trees are so important to maintain biodiversity and landscape value as even if trees are planted in their place it takes a long time for them to grow to replace properly mature trees that are felled. There should also be a 5 new for one policy to replace any trees felled and a requirement for any developer to maintain any trees planted for at least 3 years after planting.

#### HA10 Funtley Road South

g) This should be re-written to change the emphasis:

The design and layout of dwellings, roads, footpaths or other infrastructure proposals should be in a manner that does not impact on, and prevents damage to, the existing woodland on-site which shall be retained and incorporated within the development.

#### HA19: 399-403 Hunts Pond Road

Should this include some reference to the trees in the area so trees with TPOs are retained?

#### HA22 Wynton Way:

f) This should be re-written to change the emphasis:

The design and layout of dwellings, roads, footpaths or other infrastructure proposals should be in a manner that does not impact on, and prevents damage to, the existing woodland on-site which shall be retained and incorporated within the development.

#### HA26 Beacon Bottom East

No mention of preservation of trees not even those with TPOs which seem to be part of the site

#### H 33 Land East of Bye Road, Swanwick

No mention of preservation of trees not even those with TPOs or woodland which seems to be part of the site

HA34 : Land South West of Sovereign Crescent

No mention of preservation of trees with TPOs which seem to be part of the site

HA36: Land at Locks Heath District Centre

d) Is the reference to winter gardens correct as I'm not sure what this means?

HA38 68 Titchfield Park Road

e) it should clearly state the need to retain existing trees.

HA40 Land west of Northfield Park

d) Should be re-written:

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 the trees**

HA42 Land South of Cams Alders

This is taking place on land identified as important for nature conservation. The Council should avoid such areas as the Government has noted the need to keep biodiversity and green space. This development should occur on a brown field site e.g. the town centre where retail units are closing.

## **Employment**

Policy E4

SHELAA Reference: part of 124 (ID 2850)

Solent 2

This is on a site of importance for nature conservation. The Council should avoid such areas as the Government has noted the need to maintain biodiversity and green space. This development should occur on a brown field site e.g. the town centre where retail units are closing.

d) There should be a wildlife corridor to avoid the area to the west being cut off.

## **Policy E7: Solent Airport**

6.41 There should be no extension or growth of aviation as this goes counter to the advice of the Committee on Climate Change which says there should be no airport expansion if the UK is to meet its commitments to reduce carbon emissions. The expansion is also counter to FBC commitment to becoming carbon neutral.

## **Retail**

7.13/7.16: The need for retail space is likely to be lower due to the growth of on-line shopping.

7.23 There should be a focus on '15 minute communities' to reduce the need for car travel.

## **Strategic Policy on Climate Change**

8.6 This should be framed more positively so it is clear that the Council commits to finding areas to actively increase tree cover as part of its obligation to play its part in reducing Carbon emissions as trees sequester carbon. FBC should aim for 40% tree canopy cover on streets to mitigate temperature rise (the urban heat island) this is being done in Hackney. Trees also help to reduce air pollution.

### **Policy CC4: Renewable and Low Carbon Energy**

Developments should be orientated to allow maximum potential for solar power use. It could be a stipulation that all new builds have solar panels.

### **Policy NE6: Trees, Woodland and Hedgerows**

Please change wording: Where protected trees, woodland and hedgerows are subject to removal, a replacement of an *appropriate number*, species and size in an appropriate location will be required.

**Wording here should be made clearer** to reinforce the idea that there will need to be a net biodiversity increase if protected trees and hedgerows are removed for example the number of replacement trees will be 5/3 times that of those felled and there will be maintenance required for at least 3 years afterwards to ensure the trees are established.

### **Design:**

11.7 should include reference to climate change, reducing carbon footprint by insulation etc and incorporating renewable energy production using solar panels etc.

11.23 Add “need to take into account the requirement to be low energy and carbon neutral”

**Keely, Lauren**

---

**From:** Planning Policy  
**Sent:** 21 December 2020 10:47  
**To:** Consultation  
**Cc:** Trott, Katherine  
**Subject:** FW: Regulation 19 Representation on the Publication Version of The Fareham Local Plan 2037

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello Katherine,

Please can you file this, this is a representation from a member of the public.

Kind regards

Lauren Keely  
Technical Officer (Strategy)  
Fareham Borough Council  
01329824601



---

**From:** [REDACTED]  
**Sent:** 18 December 2020 16:52  
**To:** Planning Policy <PlanningPolicy@fareham.gov.uk>; Wootton, Gayle <GWootton@Fareham.Gov.UK>  
**Subject:** Regulation 19 Representation on the Publication Version of The Fareham Local Plan 2037

Please accept the following to be my representation to the publication version of The Fareham Local Plan 2037.

**Fareham Local Plan 2037 Regulation 19 Representation:-**

**REASON:** Non-compliance with planning legislation with respect to a commitment to publish all representations received throughout the plan making process ( para 8.3 )within Fareham Borough Council's adopted Statement of Community Involvement dated 6th March 2017.

Dear Inspector,

A local authority must comply not only with the specific requirements within regulation 18 of the Town and Country Planning ( Local Planning ) ( England ) Regulations 2012 on consultation, but also with the commitments within their Statement of Community Involvement ( SCI ).

At present Fareham Borough Council ( FBC ) have not complied fully with commitments set out within the SCI adopted 6th March 2017 specifically:-

Para 8.3 "All representations received throughout the plan making process will be recorded and their receipt acknowledged. They will be made available for others to freely see; however, personal information will not be made public in order to comply with the Data Protection Act."

SOURCE: [https://www.fareham.gov.uk/PDF/planning/local\\_plan/Adopted\\_CommunityInvolvement.pdf](https://www.fareham.gov.uk/PDF/planning/local_plan/Adopted_CommunityInvolvement.pdf)

As of today ( 18th December 2020 the final day for submissions to the regulation 19 consultation ) not all of the representations received have been placed fully within the public domain therefore FBC is clearly in breach of their aforementioned commitment. I wrote an email concerning this issue back in February 2020 to Gayle Wootton at the time of the last regulation 18 consultation "Strategy for Future Development" and eventually received the following response:-

"The intention is to publish responses from this consultation and the consultation in 2019 in advance of submission to Government."

I wrote back that same day

... concerning the SCI, with all due respects, I am unclear as to exactly what you mean?

"The intention is to publish responses from this consultation and the consultation in 2019 in advance of submission to Government."

For the sake of clarity, it would be most appreciated that an acknowledgement be made that :-

The Council will publish all the responses in full prior to the commencement of the regulation 19 consultation.

As no response to this clarification was proffered prior to the commencement of the regulation 19 consultation ( that ends today the 18th Dec 2020) and noting that no publicly available link or webpage has appeared displaying all the representations it is clear that FBC have actively chosen to disregard a commitment made within their adopted SCI.

I would therefore appreciate your judgement regarding the general public's legitimate expectation that FBC were to publish all of the representations received to each and every regulation 18 consultation conducted in such a manner for others to freely see.

Kind regards

Rob Stickler



For completeness and accuracy of the situation at the time of my correspondence with FBC in February 2020 I hereby attach my email setting forth the argument related to legitimate expectation and FBC's adopted SCI.

FAO: Head of Department.

Dear Sir or Madam,

I apologise for embroiling you in this issue but I sent an email dated 30/1/2020 to planning policy concerning the "Statement of Community Involvement" ( SCI ) adopted 6th March 2017. To date 17/2/2020, being some 12 working days after my initial email, I have still not received a reply. For the sake of clarity and completeness here is a copy of the email I sent:-

Dear Consultation Officer,

I've just visited the "Strategy for Future Development" survey webpage:

<https://www.snapsurveys.com/wh/s.asp?k=157890765789>

and have noticed that:-

"Individual comments will not be published and will not be attributable to an individual in the reporting of the consultation."

Could you enlighten me as to whether any modifications to the Fareham Borough Statement of Community Involvement ( SCI ) as adopted on the 6th March 2017 have taken place?

And if so, could you supply the dates and links to the meeting minutes at which any such amendments occurred.

And if not, I'd like to draw your attention to the following paragraphs from the adopted SCI:-

Para 2.1 "Be open and transparent. We will publish responses to the consultations in a timely fashion and explain how consultation responses have informed decision making."

And

Para 7.3 "All the information that forms the Local Plan evidence base will be made public 7.3 " everyone has the chance to see how it has influenced a decision. This includes the Council's responses to comments and an explanation of how they have been considered and what changes have been made because of them."

And

Para 8.1 "The Council has a responsibility to consider all the representations it receives. These will be weighed up alongside evidence documents, legal requirements, national policies and local up alongside interests. All comments will be fully considered and if they warrant an amendment for the subsequent version of the Local Plan this will be explained. In addition, if comments do not justify a change this will also be explained. Occasionally the Council may wish to contact the person or organisation directly to discuss their representations."

And



Para 8.3 "All representations received throughout the plan making process will be recorded and their receipt acknowledged. They will be made available for others to freely see; however, personal information will not be made public in order to comply with the Data Protection Act."

SOURCE:

[https://www.fareham.gov.uk/PDF/planning/local\\_plan/Adopted\\_CommunityInvolvement.pdf](https://www.fareham.gov.uk/PDF/planning/local_plan/Adopted_CommunityInvolvement.pdf)

Taken together these statements would appear to indicate that all the responses are to be published and explanations given with regard to how consultee replies have informed the decision-making process in a "timely fashion"

These paragraphs DO NOT indicate that they apply to specific consultations and therefore must logically be applicable to ALL consultations that take place within the Local Planning process, do you agree ?

If so, could you please supply a date at which FBC will be placing within the public domain all the responses to this present consultation together with all the responses to the previous consultation which ran from the 10th June- 26th July 2019 as I, amongst many others would like to view them.

I look forward to a prompt reply concerning the above issue.

Kind regards

Rob Stickler.

In light of this deathly silence, I'd like to point out that the SCI, amongst other things, sets out the Council's principles for consultation. It expressly states, in clear and unambiguous language, exactly what a member of the public should legitimately expect to occur during a consultation procedure. This includes how the responses to the consultation are to be dealt with and specifically, regarding consultee representations, it states in paragraph 8.3 that:-

"All representations received throughout the plan making process will be recorded and their receipt acknowledged. They will be made available for others to freely see; however, personal information will not be made public in order to comply with the Data Protection Act"

This paragraph infers that the full representation will be made available. This logical reasoning was confirmed by the Regulation 18 consultation "The Draft Fareham Local Plan 2036" which ran from 25 October to the 8 December 2017, in which all the representations received were placed online for the general public to view ( in their complete unsummarised form ). This consultation was subject to the exact same procedural rules contained within the adopted SCI of March 2017.

As explained in my previous email regarding the referenced paragraphs of the adopted SCI:-

"Taken together these statements would appear to indicate that all the responses are to be published and explanations given with regard to how consultee replies have informed the decision-making process in a "timely fashion"

These paragraphs DO NOT indicate that they apply to specific consultations and therefore must logically be applicable to ALL consultations that take place within the Local Planning process, do you agree ?"

Clearly this first consultation has confirmed the language used in the adopted SCI and thereby set a precedent with regard to the general public's legitimate expectation concerning the issue being raised here namely:- the expectation that all of the representations would be freely and fully available to view for all consultations undertaken within the Local Plan Development process.

It should be noted that the adopted SCI was also clearly referenced within the following Executive Briefing Papers for the two consultations to which my previous email referred firstly:-

"Future Development in Fareham" consultation which ran from the 10th June - 26th July 2019.

in which the Executive Briefing Paper ( Report to the Executive for Decision 16 December 2019 ) states:-

"20.The consultation will be undertaken in line with the Council's Statement of Community Involvement (SCI) which was adopted by the Council in March 2017."

SOURCE: Report to the Executive for Decision 16 December 2019

<https://moderngov.fareham.gov.uk/documents/s23513/Local%20Plan%20Consultation.pdf>

And secondly;

"Strategy for Future Development" i.e. the present consultation which runs from 13th Jan 2020 - 1 Mar 2020 in which the Executive Briefing Paper ( Report to the Executive for Decision 13 May 2019 ) states:-

"12. The consultation will be undertaken in line with the Council's Statement of Community Involvement (SCI) which was adopted by the Council in March 2017."

SOURCE: Report to the Executive for Decision 13 May 2019

<https://moderngov.fareham.gov.uk/documents/s22544/Local%20Plan%20Issues%20Options%20Consultation.pdf>

Therefore, this sudden "moving of the goal posts" away from the legitimate expectation which was confirmed at the time of the first consultation back in 2017 ( as described above ), with respect to that expressed within the present "Strategy for Future Development" consultation webpage namely:-

"Individual comments will not be published and will not be attributable to an individual in the reporting of the consultation."

irrefutably conflicts with the statements within the above-mentioned Briefing Papers namely that:-

"The consultation will be undertaken in line with the Council's Statement of Community Involvement (SCI) which was adopted by the Council in March 2017"

All three consultations mentioned were/are being conducted in line with Regulation 18 of the Town and Country Planning Regulations 2012 ( as amended ) and are classed as statutory. These documents together with the adopted SCI and a "Statement of Consultation" are required to be submitted to the Inspector at the time of examination.

An Inspector during examination has a duty to assess whether the statutory documents supplied have been,

"prepared in accordance with legal and procedural requirements"

SOURCE: NPPF Feb 2019 para 35

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

Government plan-making guidance states:-

"There is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with the specific requirements in regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, ('the Local Plan Regulations') on consultation, and with the commitments in their Statement of Community Involvement."

Paragraph: 034 Reference ID: 61-034-20190315

SOURCE: <https://www.gov.uk/guidance/plan-making>

And the Planning and Compulsory Purchase Act 2004 ( Section 19.3 ) states:-

"In preparing the local development documents (other than their statement of community involvement)] the authority must also comply with their statement of community involvement."

SOURCE: <http://www.legislation.gov.uk/ukpga/2004/5/section/19>

It is therefore undeniably true to say that an intrinsic component of the plan making process is the SCI. A Council must comply with what has been written, unless an Inspector confirms at examination that the procedural deviation was in general accordance with the adopted SCI . A Council of course, may choose to

modify its adopted SCI; however a Council does not have the option of alteration or disregarding parts of it at the whims and fancies of its officers. Due lawful process is required.

I cordially draw attention to the fact that at examination one such legal or procedural requirement which would be a necessity for an Inspector to address is whether the consultations have been carried out in accordance with the adopted SCI in a manner conducive to satisfying the well-established doctrine of legitimate expectation.


To be honest with you, I am rather shocked at the non-engagement of the planning policy team concerning this important point and therefore after having patiently waited for a response I now need a definitive resolution of this issue.

I thank you for your time & look forward to your correspondence.

Yours faithfully,

Rob Stickler.

**Respondent details:**

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

**1) Policy: DS3 – Landscape**

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

**Please provide details you have to support your answers above**

With respect to legal compliance of proposed development, There is no reference to the issues and public concern raised when Designated Public Open Spaces are in private ownership (in whole or in part). This is a major omission in the Regulation 19 Local Plan consultation document and thus does not reduce the risk of Developers putting forward proposals that would take our valued public open spaces away from the general public and in particular the local residents who benefit most from these important public amenities. There should be an exercise taken by Fareham Borough Council to amend the current consultation document and include the policy that FBC will object to any Development Proposals which intend to impact on Open Spaces designated under Section 52 Agreements (Town & County Planning Act 1971) or Section 106 (Town & County Planning Act 1990) but where the ownership of the land has not been transformed to the Local Authority for whatever reason. FBC must also state that it will always rigorously object to any development proposed on such Designated Public Open Space where applicants propose to override S52 or S106 Agreements using legislative powers and Development Consent Orders (DCOs) associated with S120(4) of the Planning Act 2008.

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

See above.

**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

**Respondent details:**

Title:	MRS
First Name:	PENNY
Last Name:	SYMONS
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

**1) Policy: FTC6 - Magistrates Court**

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

**Please provide details you have to support your answers above**

excellent location and single person/couple accommodation units would be very popular. Even tho I lose my favourite parking spot!

**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: 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**

a ridiculous number of new homes proposed here in a dormitory area with no nearby public transport, over-subscribed schools, GPs and dentists and grid-locked roads at rush-hours, particularly the Brook Lane and Barnes Lane and Brook Avenue junctions. Entrances onto Brook Lane will be very clogged and dangerous. Inadequate parking will be provided so parking spillage in surrounding residential roads will be a nightmare Yellow lines will need to be introduced. Gridlocks also at junctions with A27. Far too many houses and flats proposed for Sarisbury and Locks Heath and Warsash area which will become a conurbation.

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

Keep more countryside



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

former agricultural land should not be built upon.

**Your suggested revised wording of any policy or text:**

in line with council policy to preserve the green spaces still left in the Western wards, these developments to be shelved/mothballed

**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: HA32 - Egmont Nursery

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 supposed to be countryside, and it not adjacent to the urban boundary and is and always has been agricultural with very light traffic. There will be a large increase in traffic during construction and in final usage. This is a private road with restrictions in existing residents deeds against future developments with no right of use for any additional residents. This rights are being challenged legally by the Brook Avenue Residents Association which represents most residents/existing homes in the road.

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

This is countryside

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

This is countryside and abuts Holly Hill.

**Your suggested revised wording of any policy or text:**

this site should not be developed and should continue to be protected as being in the countryside zone being adjacent to Holly Hill and also located off a private road for which there is no legal right of access and no alternative access via the public highway.

**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: FTC2 - Market Quay

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

**Please provide details you have to support your answers above**

excellent plan to provide housing in this central location. Well located for public transport as well as road access. All new housing in the centre of town is to be welcomed to stimulate reinvigoration, especially shops, cafes and other services...

**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: FTC3 - Fareham Station East

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

**Please provide details you have to support your answers above**

excellent plan to provide housing in this central location. Well located for public transport as well as road access. All new housing in the centre of town is to be welcomed to stimulate reinvigoration, especially shops, cafes and other services...

**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: 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**

An excellent plan to provide housing in this central location. Well located for public transport as well as road access. All new housing in the centre of town is to be welcomed to stimulate reinvigoration, especially shops, cafes and other services...

**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: HA27 - Rookery Avenue

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

**Please provide details you have to support your answers above**

Good to have 27 houses in this location with good road access and local shops etc.

**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: HA39 - Land at 51 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**

This is agricultural land and should be left as such - especially as so many houses have already been given pp in this immediate area. Too much traffic etc.

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

countryside

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

keep as countryside

### **Your suggested revised wording of any policy or text:**

keep as open space /countryside.

### **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

---





## Regulation 19 – Submission Draft

<b>Project:</b>	Land west of Downend Rd, Portchester	<b>Date:</b>	17 December 2020
<b>Subject:</b>	Fareham Local Plan	<b>Reference:</b>	249501F

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Associate Director  
*Organisation:* Terence O'Rourke Ltd





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

- |                                  |                    |
|----------------------------------|--------------------|
| <input type="text"/>             | Paragraph (B1a)    |
| <input type="text" value="DS1"/> | Policy (B1b)       |
| <input type="text"/>             | Policies map (B1c) |

**B1a Which paragraph?**

n/a

**B1b Which policy?**

DS1 Development in the countryside

**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 detail you have to support your answers above**

The wording of policy DS1 is not consistent with National Policy. The policy outlines criteria where development outside the urban area will be support, but requires proposals in these instances to demonstrate that they are not the best and most versatile agricultural land.

The NPPF is clear that whilst planning policies need to recognise the best and most versatile agricultural land (paragraph 170), footnote 53 is clear that “*where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality*”. The National Policy stance is not to prevent the use of the best and most versatile agricultural land but to support a preference for lower quality land and this only applies to ‘*significant developments*’. The policy text should be amended to be consistent with this approach.

**B4a. What modifications(s) is necessary to make the Local Plan legally compliant and or sound?**

The policy text should be consistent with National Policy and not seek to prevent development on the best and most versatile agricultural land but to demonstrate a preference for low quality land. It should be noted that other factors need to be taken into consideration, for instance, the lowest quality agricultural land may not be in the most accessible locations or suitable for development.





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

Providing consistency with National Planning Policy would make this part of the policy sound, the text for criterion V can be deleted as this aspect is covered by National Policy.

**B4c. Your suggested revised working of any policy or text:**

Delete criterion v, this aspect is covered by National Planning 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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	<b>Land west of Downend Rd, Portchester</b>	<b>Date:</b>	<b>17 December 2020</b>
<b>Subject:</b>	<b>Fareham Local Plan</b>	<b>Reference:</b>	<b>249501F</b>

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Managing Director  
*Organisation:* Terence O'Rourke Ltd





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

<input type="text"/>	Paragraph (B1a)
<input type="text" value="HA4"/>	Policy (B1b)
<input type="text"/>	Policies map (B1c)

**B1a Which paragraph?**

n/a

**B1b Which policy?**

HA4: Downend Road East

**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 detail you have to support your answers above**

Miller Homes support the allocation of the land to the east of Downend Road as a site that is in a sustainable and suitable location to deliver residential development. The proposed development is located adjacent to the existing settlement boundary and can be well integrated with the existing settlement. Whilst a recent outline planning application was refused by Members, the reasons for refusal were related to off-site highway improvements only, and planning officer's at Fareham Borough Council recognised the site as suitable for development and recommended the application for approval (reference P/20/0912/OA). Further, Hampshire County Council, as Highways' Authority, had no objection to the application and the Council's own Transport Consultant, Mayer Brown, has confirmed the acceptability of the allocation in transport terms – this report forms part of the Council's evidence base for the Local Plan and concludes that in transport terms the site is deliverable. It is Miller Homes intention to submit an appeal following the committee's decision and in terms of the allocation, there is no reason to doubt the deliverability of the site.

In terms of highway access the policy provides at (c) that primary access should be to Downend Road. The planning applications for the site have established that the only feasible access to the site is from Downend Road, and that there are no other opportunities. The policy should be clarified in this regard.

Whilst the site is considered to be in a suitable and sustainable location, supporting its allocation to deliver new homes, Miller Homes has specific concerns with some of the policy requirements, listed below, which mean the policy is not justified or sound in regard to those specific elements.



The site is close to the Downend Quarry SSSI. This SSSI is notable for its geological features. Natural England has confirmed that no mitigation measures are required because the site is on private land and will not be subject to increased recreational pressure as a result of the development. Natural England's response confirming this position was provided in response to outline planning application P/20/0912/OA, in an email from Alexander Wilson dated 12 October 2020. There is no requirement to provide a buffer, and to include this requirement in the policy is unjustified.

It is unclear as to why a minerals assessment is required. The site is within a minerals and waste consultation area because it lies close to the safeguarded site of Warren Farm and Down End Quarry which is a waste site operated by Veolia Environmental Services (UK) Plc. Outline application P/20/0912/OA did not provide this information and the officer's report confirms no objection to the proposed development by Hampshire County Council Minerals and Waste Planning Authority. In any event, if there were requirements for this information, it would be covered by Hampshire County Council's Minerals and Waste Plan Framework, which forms part of the development plan. This policy requirement should be removed.

A standalone new pedestrian footbridge is not required over the railway as part of this development. This has firmly been established, most recently through outline planning application P/20/0912/OA. The officer's report for that application clearly sets out Hampshire County Council's position on the proposed improvements to the bridge, which provide a well defined and safe footway across the existing bridge facilitated by signal-controlled shuttle working for vehicular traffic.

At paragraph 8.58 of the report the officer summaries that *"the improvements to the bridge crossing are both safe for pedestrians and other highway users and acceptable in terms of the modest queue lengths and delay anticipated. The proposal to install traffic signals enables an industry standard traffic model to be used which overcomes the uncertainty at the heart of the previous appeal"*.

It is important to conclude that the application does not provide or warrant a separate footbridge over the railway and no objection is raised by Hampshire County Council as Highways Authority on this matter. As such there is no need or reasonable justification for the policy to suggest the delivery should include a footbridge over the railway at Downend Road, improvements necessary can all be accommodated within the existing highway network. As part of its Evidence Base the Council commissioned its own transport consultants (Mayer Brown) to consider the deliverability of the site. This considered the content of the Planning Application (P/20/0912/OA) which deliver a footway across the bridge. The report concludes that the scheme is acceptable and does not identify the requirement for a footbridge. There is no evidence presented to show why a footbridge would be required, and its delivery falls outside of the control of the site promoter. This requirement is unjustified and should be removed.

It is noted that the indicative master plan for the site, figure 4.3, identifies provision of sports pitches to the east of the site. Whilst we note that the master plan is indicative, it is misleading to suggest that sports pitch provision could be accommodated of this size and scale. Due to the topography of the site, a sports pitch in the scale as indicated on the indicative masterplan would result in an impractical sports pitch, or

with necessary levelling works (cut and fill) that could have implications on the nationally important archaeological remains and undesirable visual consequence, such as large retaining walls.



In any event, the evidence base fails to justify a requirement for a full-size sports pitch in this location and it is unclear as to how the community would effectively utilise a single pitch in isolation from other pitches/sports provision.

As such sports pitch provision should not be shown in this scale as it is misleading to suggest such a provision could be accommodated here.

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

The policy text should be amended as follows:

“Proposals should meet the following site-specific requirements:

- a. The quantum of housing proposed shall be broadly consistent with the indicative site capacity; and
- b. A design and layout that takes account of the site’s constraints and context, in particular the site’s landscape setting on Portsdown Hill, the Downend Chalk Pit SSSI and the potential presence of Palaeolithic archaeological remains; and
- c. Highway access shall be focused on Downend Road; and
- d. A network of interconnecting green and public access corridors throughout the site incorporating existing ecological and archaeological features and allowing only minimal highway cross over points (kept minimal in width); and
- e. The provision of pedestrian and cycle connectivity from the site to Downend Road, The Thicket and Upper Cornaway Lane; and
- f. Buildings heights limited to a maximum of 2.5 storeys, except for buildings which front onto the site access or perimeter, where heights will be limited to a maximum of 2 storeys; and
- ~~g. Proposals should ensure a buffer is designed to protect the SSSI at Downend Quarry and the creation and enhancement of ecological corridors; and~~
- h. The design of the development should take into account the close proximity to the waste transfer station with the potential for odour; and
- i. A robust archaeological survey of the site to determine the Palaeolithic potential at the site, with areas identified as having high potential being designed within areas of open space or green corridors; and
- ~~j. A Minerals Assessment will be required prior to any development in accordance with the Hampshire Minerals and Waste Plan; and~~
- k. A Neighbourhood Equipped Area of Play (NEAP) on-site within an accessible location; and
- l. Highway improvements to facilitate the development including:
  - i. A pedestrian footway ~~or footbridge~~ over the existing Downend Road bridge and connections and improvements to wider pedestrian and cycle networks at The Thicket and Upper Cornaway Lane; and
  - ii. Provision of pedestrian and cycle links towards the A27 Bus Services and future Rapid Transit connecting Fareham Town Centre and railway station, Portchester, Portsmouth and local employment hubs; and
  - iii. Improvements to the Downend Road, A27 and Shearwater Avenue junction.

- m. Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4 and NE3, including contributions towards improvements at Delme Roundabout



In addition, the size of the Park and Recreation area including sports pitch provision should be reduced in figure 4.3.

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

The modifications would resolve the issues raised and make this policy sound.

**B4c. Your suggested revised working of any policy or text:**

Please refer to the detailed response at B4a above.

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	<b>Land west of Downend Rd, Portchester</b>	<b>Date:</b>	<b>17 December 2020</b>
<b>Subject:</b>	<b>Fareham Local Plan</b>	<b>Reference:</b>	<b>249501F</b>

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Associate Director  
*Organisation:* Terence O'Rourke Ltd







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

<input type="text"/>	Paragraph (B1a)
<input type="text" value="NE8"/>	Policy (B1b)
<input type="text"/>	Policies map (B1c)

**B1a Which paragraph?**

n/a

**B1b Which policy?**

NE8: Air Quality

**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 detail you have to support your answers above**

Policy NE8 needs to retain more flexibility to ensure it is effective as technology advances in regard to the charging of plug-in and other ultra-low emission vehicles.

Instead of providing the charging point for each dwelling with off-street parking, the policy could require developers to enable dwellings are future proofed (by providing associated wiring / ducting and connections) to enable its instalment if required in the future. This is compliant with the NPPF 110(e) which requires development to 'enable' charging facilities.

Furthermore, NE8 is too specific and unnecessarily onerous by requiring 'Rapid' charging infrastructure to be provided for parking areas serving 10 or more dwellings. Rapid charging facilities are normally associated with public parking areas where the duration of stay is short, delivering an 80% charge within 20-30 minutes. Rapid charging facilities however carry a very substantial installation cost. For shared residential parking areas, this specification of charging infrastructure is wholly unnecessary and onerous. A 'Fast' charge facility delivers 80% charge in 6 hours and is appropriate for residential parking where vehicles will generally be in situ for longer periods of time.

The Policy should be less specific in terms of the specification of charging infrastructure to enable an appropriate strategy for each site to be developed and

delivered, taking account of the technology available at that time and the specifics of the development site.



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

Please refer to the detailed response at B3 above.

The policy should be less onerous and specific in relation to the standard and specification of charging facilities to be provided for shared parking areas.

The sub-text of the policy (9.117) should be specific about those developments that will require a detailed Travel Plan to be produced, it is suggested by referring to the Hampshire County Council thresholds. This paragraph is also inconsistent with Policy NE8 by setting out that each parking space requires a charge point, rather than each dwelling and should be addressed.

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

Please refer to the detailed response at B3 above.

**B4c. Your suggested revised working of any policy or text:**

a) Provides for the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations as follows:

- enable the future installation of one EV charging point installation per residential dwelling with off- street parking; and,
- Provide EV Charging facilities in shared parking areas per 10 residential dwellings or 1,000m<sup>2</sup> of commercial or leisure floorspace in line with a strategy to be agreed with the Council; and

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	Land west of Downend Rd, Portchester	<b>Date:</b>	17 December 2020
<b>Subject:</b>	Fareham Local Plan	<b>Reference:</b>	249501F

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Associate Director  
*Organisation:* Terence O'Rourke Ltd





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

- |                                  |                    |
|----------------------------------|--------------------|
| <input type="text"/>             | Paragraph (B1a)    |
| <input type="text" value="HP7"/> | Policy (B1b)       |
| <input type="text"/>             | Policies map (B1c) |

**B1a Which paragraph?**

n/a

**B1b Which policy?**

HP7 Adaptable and Accessible Dwellings

**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 detail you have to support your answers above**

Whilst we recognise the need to provide adaptable and accessible new homes in Fareham, Policy HP7 should enable greater flexibility in regard to the percentage of dwellings to meet adaptable standards, to ensure it reflects any changing need during the course of the plan period and individual site circumstances.

National Planning Policy Guidance is clear that, where there is an identified need, optional technical standard can be used to increase supply of accessible and adaptable homes, but the NPPG requires this to be on the basis that the need has “*to be based on evidence of need, viability and consideration of site specific factors*” (paragraph 009 reference ID: 63-009-20190626). The policy does not allow these factors to be taken into consideration and is therefore not consistent with National Planning Policy.

**B4a. What modifications(s) is necessary to make the Local Plan legally compliant and or sound?**

In respect the blanket requirement for accessible and adaptable dwellings standards on all sites, these are considered inflexible, and specific wording should be added to caveat the policy, confirming exceptions can be made where applicants / applications

can demonstrate achievement of a standard is not possible, practical or economically viable in relation to a development proposal in order to accord with the national Planning Policy Guidance.



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

Providing a flexible approach would ensure the plan is able to adapt to changing circumstance, site specific circumstances and maintains consistency with national policy.

**B4c. Your suggested revised working of any policy or text:**

Add text: "Unless it can be demonstrated that accessible or adaptable dwellings are not required, would make a development unviable or are not practical from a site-specific basis."

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	Land west of Downend Rd, Portchester	<b>Date:</b>	17 December 2020
<b>Subject:</b>	Fareham Local Plan	<b>Reference:</b>	249501F

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Associate Director  
*Organisation:* Terence O'Rourke Ltd





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

<input type="text"/>	Paragraph (B1a)
HP9	Policy (B1b)
<input type="text"/>	Policies map (B1c)

**B1a Which paragraph?**

n/a

**B1b Which policy?**

*HP9 Self and Custom Build Homes*

**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 detail you have to support your answers above**

Miller Homes continues to question the requirement to provide self-build provision on sites of more than 40 dwellings because of the practical implication of delivery and lack of need. The supporting Background Paper 'Self and custom build housing' September 2020, notes that only 79 people are registered on the Council's self-build list, with a range of different requirements that they are looking for, so not all registered would want a plot on a development site. Equally, if all development over 40 dwellings provided 10% of the scheme as custom and self build they would be likely to be a significant oversupply. This policy approach is not achievable, or justified by demand.

Most strategic-scale sites are brought forward by housebuilders, who seek to masterplan their developments in a holistic way and provide appropriate controls over the shared infrastructure and open space. As such it is considered extremely challenging to incorporate self-build plots effectively into strategic sites. Miller does not object to the inclusion of self-build opportunities within the emerging Plan, but considers that specific sites should be identified for this sole purpose. If the LPA continues with the inclusion of self-build housing on large development sites, it should be supported with appropriate evidence to demonstrate such demand, and parameters should be established within policy to ensure overall conformance with the masterplan and architectural style.





**B4a. What modifications(s) is necessary to make the Local Plan legally compliant and or sound?**

The approach to Self and custom build needs to be reconsidered by the council to deliver specific sites, solely for that purpose.

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

Specific self and custom build plots would be an appropriate strategy, that would ensure the plan takes positive steps to plan towards meeting the identified need.

**B4c. Your suggested revised working of any policy or text:**

This would be for the council to review and reconsider appropriate allocations to meet the demand.

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	Land west of Downend Rd, Portchester	<b>Date:</b>	17 December 2020
<b>Subject:</b>	Fareham Local Plan	<b>Reference:</b>	249501F

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

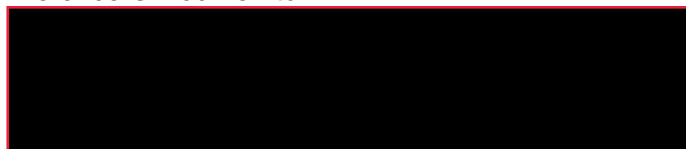
No: ☐

#### A2. Please provide your details:

Title: c/o agent  
First name:  
Last name:  
Job title:  
Organisation: Miller Homes  
Address:  
Postcode:  
Telephone number:  
Email address:

#### A3. Please provide the Agent's details:

Title: Mrs  
First name: Lindsay  
Last name: Goodyear  
Job title: Associate Director  
Organisation: Terence O'Rourke Ltd  
Address:  
Postcode:  
Telephone number:  
Email address:





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

<input type="text"/>	Paragraph (B1a)
<input type="text" value="NE2"/>	Policy (B1b)
<input type="text"/>	Policies map (B1c)

**B1a Which paragraph?**

n/a

**B1b Which policy?**

NE2 Net biodiversity gain

**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 detail you have to support your answers above**

The Environment Bill will cover the requirement for development sites to deliver net biodiversity gain. In order to ensure the plan is consistent with national policy the requirement for biodiversity net gain should be set at the national level.

The policy requires biodiversity net gain of at least 10% to be achieved for the lifetime of the development. Whilst that is admirable, it may also be very challenging to demonstrate at the planning application stage and then later control and monitor. Features introduced into a development now to ensure biodiversity net gain is achieved may not be relevant, function or be necessary throughout the lifetime of the development.

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

Delete the policy and rely on the Environment Bill to ensure schemes deliver 10% biodiversity net gain.

Or at least, remove the reference to require the biodiversity net gain to be provided for the lifetime of the development as this is not enforceable.



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

Deleting the policy would remove any potential future conflict with the Environment Bill once it is enacted.

**B4c. Your suggested revised working of any policy or text:**

Please refer to the detailed response at B4a and b above.

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



## Regulation 19 – Submission Draft

<b>Project:</b>	<b>Land west of Downend Rd, Portchester</b>	<b>Date:</b>	<b>17 December 2020</b>
<b>Subject:</b>	<b>Fareham Local Plan</b>	<b>Reference:</b>	<b>249501F</b>

### Representation made to Fareham's Draft Local Plan 2037

Formal submission of representation will be made on 18 December via email to Fareham Borough Council.

### Response to consultation form

#### A1. Is an agent appointed:

Yes: ☒

No: ☐

#### A2. Please provide your details:

*Title:* c/o agent  
*First name:*  
*Last name:*  
*Job title:*  
*Organisation:* Miller Homes  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*

#### A3. Please provide the Agent's details:

*Title:* Mrs  
*First name:* Lindsay  
*Last name:* Goodyear  
*Job title:* Associate Director  
*Organisation:* Terence O'Rourke Ltd  
*Address:*  
*Postcode:*  
*Telephone number:*  
*Email address:*





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

4.2 & 4.16	Paragraph (B1a)
H1	Policy (B1b)
	Policies map (B1c)

**B1a Which paragraph?**

Table 4.2 Housing Requirement and Sources of Supply and paragraph 4.2  
Housing provision paragraph 4.16

**B1b Which policy?**

H1: Housing provision

**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 detail you have to support your answers above**

**Fareham's Housing Need**

The housing requirement identified in the plan is not sound or legally compliant, it fails these tests as it is not based on the Standard Methodology set out in the PPG and the plan presents no evidence to demonstrate local exceptional circumstances for diverging from this approach. In failing to follow the Standard Methodology approach the plan is failing to “*significantly boost*” the supply of land for new homes as required by the NPPF (paragraph 59).

The NPPF is clear that development needs must be met (NPPF 11) and that, with respect to housing, “*strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*” (paragraph 60, our emphasis).

The standard methodology figure for Fareham is 514 dwellings per annum. This should form the basis for the plan as a minimum. The identified plan ‘requirement’ of 403 dpa (excluding provision for unmet need from adjacent authorities) falls significantly short of this figure and is not an effective basis on which to build a plan.



Paragraph 4.2 of the plan states that it is appropriate to use the draft methodology figure of 403pda because the current methodology is based on out-of-date housing figures. The Council is wrong in its approach. This does not comprise an exceptional circumstance the Council were clearly hoping to rely on a new approach published by the Government for consultation but on which Minister where always clear that this could not be relied upon. The approach is not justified, not positive and clearly unsound as demonstrated by the revisions to the standard method on the 16 December 2020, confirming the starting point for Fareham is 514 dpa.

Significantly, the overall level of need identified must ensure that land supply does not become a 'limiter' in achieving the national aspirations. Hence, the approach that has been taken in the Reg 19 plan, to use the revised draft methodology in order to reduce the planned requirement is seriously flawed, and undoubtedly inconsistent with the NPPF.

In short, the revised draft methodology figure does not provide a suitable or sound basis on which to plan, it falls significantly short of meeting the Council's needs and as such it is not an appropriate strategy, is unjustified and clearly inconsistent with the NPPF.

The significant reduction cannot be considered to align with Government policy to "*significantly boost*" the supply of housing (NPPF paragraph 59) or as a positively prepared plan. Particularly, when earlier work has demonstrated there are deliverable, sustainable and suitable sites available now to meet that need.

The draft Plan also notes, at paragraph 4.2, that the housing requirement will now be fixed for a period of 2 years at this low level, to allow for the submission and examination of this Plan. The Planning Practice Guidance (PPG), allows that in cases where "*the local housing need calculated using the standard method may be relied upon for a period of two years from the time that a plan is submitted for examination*" (paragraph 008, ref ID: 2a-008-20190220). This is not the case here, as the plan is not based on the standard method set out in the PPG and updated on the 16 December 2020, but a proposed approach to the standard method that was published for consultation but was never adopted as policy. The result is significant under delivery of homes required. Reliance on this figure for the next two years is not justified or consistent with National Policy, in this context and is likely to result in a significant under-delivery of much need market and affordable housing.

### **Housing Provision: Stepped Approach**

Again, the stepped approach to housing land supply is entirely inconsistent with the NPPF. The plan seeks to justify a stepped approach on the basis of when sites are likely to deliver. This is the wrong way round. The NPPF requires a clear and staged approach:

1. Identify the overall need (para 60)
2. Identify sufficient deliverable sites to meet the five-year need (para 67)
3. Identify sufficient developable sites to meet the need post year 6 (para 67)

NPPF paragraph 73 does not facilitate a stepped approach, indeed the PPG confirms:



*“The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period.” (2a-012-20190220)*



It is understood that there is reliance on delivery at Welborne, but this development already has a resolution to grant planning permission and is relied on in the five-year supply. Other sites are said, at paragraph 4.16, to be expected to start delivering at the end of the five-year period. If this is the case, more land should be identified to contribute to the deliverable five-year supply. In fact, the Council had identified more land to do just that, at the earlier stage of consultation, and has deleted sustainable sites from the deliverable supply; the root cause of the problem.

It is unacceptable for the Council not only to fail to plan for sufficient housing land but to seek to delay and limit provision to the later part of the plan period, leaving a whole generation without sufficient housing. By illustration, if the Council pursues this course of action, supply of housing will not catch up with housing need until year 2035, as follows:

Year	21/22	22/23	23/34	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37
Need	514	514	514	514	514	514	514	514	514	514	514	514	514	514	514	514
Accumulating	514	1028	1542	2056	2570	3084	3598	4112	4626	5140	5654	6168	6682	7196	7710	8224
Stepped Requirement	450	450	450	450	450	480	480	480	480	480	625	625	625	625	625	625
Accumulating	450	900	1350	1800	2250	2730	3210	3690	4170	4650	5275	5900	6525	7150	7775	8400
Shortfall / surplus	-64	-128	-192	-256	-320	-354	-388	-422	-456	-490	-379	-268	-157	-46	65	176

This is not a positive approach to addressing housing need. Policy H1 is inconsistent with the NPPF and unsound, working against the Government imperative to meet need and boost housing land supply

## Housing supply

Whilst the proposed changes to the standard method need some work, the message in the consultation paper and in the Planning for the Future White Paper, is clear that the planning system needs to ensure *“sufficient land is released for homes”* (paragraph 6, Changes to the current planning system, consultation paper). In fact, paragraph 6, goes on to highlight the issue that adopted local plans only provide for 187,000 homes a year, significantly below the 300,000 homes a year government target and also less than the 241,000 homes delivered in 2019. This is a clear indication that local plans are failing to provide sufficient homes to meet needs. A planned step change in delivery is essential.

Fareham has suffered from consistent under delivery of housing for many years, as evidenced by the Council’s latest Annual Monitoring Reports (2018-2019), published February 2020. Even in the last few years a delivery deficit of 272 new homes has accumulated in the three years between 2016/2017 - 2019/2020, if assessed against the housing standard methodology need figure base-dated at April 2020 (514dpa).

Further, Appendix B of the draft Local Plan outlines an anticipated delivery deficit of 152 new homes between 2021/2022 and 2022/2023, even against the low target of 403 dpa.

As set out by the Government and reflected at the national level, this clearly highlights the need to plan for more homes now, to ensure both market and affordable housing

is delivered to meet the identified need. As set out above, it is inconsistent with the NPPF and unjustified in Fareham Borough to take the approach of retrofitting the requirement to supply towards the latter part of the plan period, from a target of 450 dpa in 2021/22 - 2025/26, to 480 dpa in 2026/27 - 2030/31 and 625 dpa in 2031/32 - 2036/2037.



Identifying deliverable sites is key. However, the plan does not take this approach.

Table 4.2 includes 552 dwellings with outstanding planning permission (be that full or outline) to be delivered in the plan period but it provides no evidence that all these permissions will progress to completion of new homes at the point envisaged.

Clearly this evidence, lacking from the Reg 19 consultation, is absolutely essential in order to test the effectiveness of the plan. The housing trajectory at Appendix B of the plan provides insufficient information to understand how the Council can maintain a five-year housing land supply. It is meaningless and falls far short of the requirement to demonstrate a five year supply and, given the primary reliance on sites rather than broad areas of search, it would be appropriate for the trajectory to set out the anticipated rate of development for those sites, in accordance with NPPF paragraph 73.

In this context, and prior to the publication of an appropriate and transparent evidence base, we would make the following comments.

There is significant reliance on the delivery on new homes at the Welborne Garden Village to meet Fareham's housing target. Welborne accounts for 4,020 homes in the plan period and was original intended to meet housing needs across the sub-region, something that seems to have been lost in the current plan.

Welborne has already suffered from significant delays. An outline planning application was submitted in 2017. Whilst there is a resolution to approve (made in October 2019), the outline consent has not been granted, because the section 106 has yet to be agreed. This is unsurprising, as for such a significant new settlement the section 106 will be complicated. Fareham Housing Land Supply Statement, dated June 2020, suggested that the S106 would be signed and permission issued "*in the near future*" (paragraph 28). Over five months later it has not been signed and outline permission has not been issued.

Once the S106 is agreed and signed by all parties, reserved matter details will need to be prepared, submitted and agreed by the Council and pre-commencement conditions discharged. Construction of dwellings on site could be years away, as infrastructure to support the new homes will need to be provided before the homes themselves.

One of the most significant barriers to delivery at Welborne is the junction 10 improvements to the M27. Only 1,000 dwellings can be delivered before this improvement work is complete. As such it is needed early. The junction 10 improvements are forecast to cost between £85m and £100m, at present it is understood that there is a significant funding gap, with a shortfall of between £55 to £70 million. Press articles suggest that the Council and Partners wrote to the Prime Minister stating that "*the delivery of Welborne Garden Village is in jeopardy unless government funding is urgently found*" (the article was published in Portsmouth News on 8 October 2020, written by Richard Lemmer).

The plan itself does not provide a detailed trajectory for Welborne, neither is there relevant information in the supporting evidence base. The plan states that delivery is expected in the “*short to medium term*”. There is no evidence provide with the plan to demonstrate how and if this will happen or if and how the funding for the junction improvement could be sourced.



The significant funding gap in this key infrastructure requirement casts significant doubt over the ability to deliver Welborne within the timescales anticipated in the plan, or indeed if the full development potential of the site can be achieved. Any slippage in delivery, which seems likely based on the funding gap set out above, will reduce the delivery of homes in the plan period. Welborne is a significant site in the plan, delivering almost half of the plan's housing requirement. Any delay would have significant consequences for the plan and the five year supply position. To avoid significant consequences for the plan, other deliverable sites should be allocated to ensure housing delivery meets needs.

The Council's latest five-year position statement (June 2020, which is not included in the evidence base for the plan) indicates delivery of 30 dwellings could commence in 2022-2023 but this was based on a consent “*in the near future*”. Further delay has clearly occurred and funding of the most critical infrastructure remains unsecure, placing in considerable doubt the ability to deliver 450 dwellings at Welborne between 2022 and 2025 (Fareham's Housing Land Supply Position Statement dated June 2020).

The current position of the Council (dated 24 June 2020) is that it can only demonstrate a deliverable five-year supply of 2,177 homes at 1 April 2020, representing a supply of 4.03 years. This is based on a 5% buffer, but it is likely that the Council will move to a 20%. The statement provided does not include sufficient evidence to demonstrate all the sites included are deliverable as some fall outside the NPPF's categories (page 66 definition of deliverable). At this point in time, the identified total supply of 8,389 homes in Policy H1 to cover the period 2021 – 2037 includes sites with planning permission and on windfalls, but there is no clarification or visibility as to how this plan-period supply from 1 April 2021 relates to the five-year period from 1 April 2020. Also, there are variances on windfall rates etc.

Until the evidence base is published, there is no clarity of the supply but what is clear is that additional deliverable land is required in order to meet the NPPF requirements.

### **The Borough's affordability**

The NPPF is clear that the of the requirement to “*significantly boost*” the supply of land for new homes. The reason for this is made clear in the government's response to “Changes to the current planning system” updated 16 December 2020, that this is about:

*“giving a new generation the chance to access the homes they deserve. The same chances generations before them were given. This is a matter of social justice and inter-generational fairness. It would be wrong for our built environment to respond only to the needs of older, wealthier people. We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities”* (our emphasis)

The Housing White Paper 'Planning for the Future', August 2020, also recognises the need to *"increase the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities and foster a more competitive housing market"* (page 18).



Paragraph 1.42 of the draft Local Plan outlines the Borough's affordability issues, namely for first time buyers and households of low income. The Council also highlights that there is now an ageing population that needs to be taken account of.

In the year ending 2019, Fareham's average house price was £288,500. This is approximately 20% higher than the national average in the same year, which according to ONS<sup>1</sup> was £231,996.

To help alleviate the affordability issue, the draft Local Plan should be seeking to boost the supply of housing and reduce the affordability gap.

What is more, the Borough's Affordable Housing Strategy, October 2019, identifies a current affordable need in the Borough of 3,000 households and need across the plan period of 3,500 affordable homes (circa 233 dpa). Delivery at this level would require a significant step change from the current position.

These affordable homes will primarily be delivered in combination with market housing.

It is notable that the housing land supply promoted in the draft local plan amounts to 8,389 new homes. However, 94 of those homes comprise outstanding small permissions and 1,224 'windfalls', noted in the plan as likely to comprise previously developed land. Both categories are highly unlikely to achieve any significant quantum of affordable housing. Further, as noted above, 847 homes are to meet needs from adjacent boroughs and would therefore attract affordable need from adjacent boroughs rather than addressing Fareham Borough need.

Discounting these elements of supply, all housing supply (market and affordable) will be in the region of 6,224 dwellings, so in order to meet the affordable demand 56% would need to be affordable. However, the policy HS5 affordable targets (which are varied depending on location in the Borough) are averaged at 31% affordable across the Borough.

Clearly the overall supply, in combination, will not achieve this level of provision, in fact provision relative to need is likely to be dismal. This is another justification to increase supply above and beyond the standard methodology need figure.

## **Conclusion**

The NPPF is clear that to be found sound the plan must be positively prepared seeking to meet the Borough's objectively assessed housing needs as established by the standard methodology. The use of the draft standard methodology, as set out in the consultation document, as a basis for the housing requirement is untenable, unjustified and inconsistent with the NPPF and Government imperative to boost housing land supply.

---

<sup>1</sup> <https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/housepriceindex/march2020>

The stepped approach to housing delivery is equally inconsistent to the NPPF and unjustified given the additional sustainable sites available, that were previously promoted by the Council as sustainable alternatives (see below). Nothing has changed, and the current omission of these sites renders the plan unsound.



Currently Policy H1 is inconsistent with the NPPF and unsound. To ensure consistency with national policy, specifically, the need to significantly boost the supply of housing, in the plan and the five-year period, the Borough needs to allocate more sites for housing now.

#### **Land to the west of Downend Road (site ID 3009), and to the north of allocation HA4 (site ID 3130)**

Regardless of whether the plan needs to identify more land to deliver the homes required to meet housing need, the Council has excluded from the draft plan the land to the west of Downend Road and land to the north of allocation H4. Both sites present suitable, sustainable extensions to Portchester, that will benefit from the services and facilities provided there.

Land to the north of the allocation H4 (ID 3130), could provide a sustainable extension to this allocation, delivering around 100 new homes. It is well connected to the existing settlement and the allocation, and as such would provide a sensible rounding off of the town in this location.

The SHELAA raises concerns in regard to the delivery of the site due to the capacity of the junction of Downend Road at the A27. These concerns are not borne out by the Council's own transport evidence base. In its Strategic Transport Assessment (September 2020) and associated assessments, FBC assessed the earlier spatial strategy for the Borough, which included both the earlier allocation sites (such as HA2 Newgate Lane and HA5 Romsey Avenue), as well as the two SGAs, one at Stubbington and the other comprising the Portchester SGA at Downend Road. In broad terms the Council has therefore assessed the impacts of just over 12,000 dwellings of growth, including 1,000 dwellings at Downend Road, rather than the 8,400 dwellings it now proposes. Overall, the Council assessed the traffic impacts of the projected growth and this assessment does not show a severe or even significant impact arising at the A27 / Downend Road / Shearwater Lane junction. Overall, FBC concluded that, subject to appropriate mitigation on those junctions that do suffer significant impacts, the proposed local plan growth was acceptable:

*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.*

On this basis, there is no reason to discount the land North of H4 on transport grounds.

The land to the west of Downend Road (ID 3009) had been included in the Council's January 2020 update to the local plan as a strategic growth area to deliver new homes, a clear indication that the Council was confident that new homes could be delivered in a suitable and sustainable way in this area.

The approach was clearly support by neighbouring authority, Portsmouth City Council, that responded to the consultation on the 25 February 2020, noting that:



*“As outlined above Portsmouth has unmet housing need and potentially unmet employment need. Both of the two Strategic growth areas are reasonably accessible to Portsmouth. However, of the two areas, north of Downend is better located to accommodate unmet housing need from Portsmouth, with a close geographical proximity to the city and good transport links via the M27/ A27, Portchester railway station and the proposed Bus Rapid Transit (BRT) line. A specific reference to Portsmouth's unmet housing need in relation to the North of Downend Strategic Growth Area would provide a clear indication of how the two authorities are dealing with Portsmouth's unmet need through the Duty to Cooperate.”*

Significant technical work has been undertaken to demonstrate that the site is in a sustainable and suitable location to deliver new homes effectively in the plan period. This work was undertaken in close liaison with Fareham Borough Council and the benefits of the site are clearly recognised by the neighbouring authority.

The site could deliver between 500 and 600 new homes. It abuts the settlement boundary of Portchester, which is established as a sustainable settlement with good rail connections and local employment opportunities. This site also benefits from relatively close proximity to Fareham town centre and access to the services, shops and facilities provided by the town centre.

The SHELAA incorrectly identifies that further work is required to demonstrate a suitable highways solution. Significant work has been undertaken conjunction with the Council, Hampshire County Council, Highways England to demonstrate that the Land can be suitably delivered with access to the A27 achievable, beyond what would normally be required at this stage of the plan. Concept stage design work was presented, supported by extensive supporting information on traffic flows and modelling, each which demonstrate that a new junction to the A27 south of the M27 is achievable. Both HE and HCC confirmed that they were satisfied at this stage that there are no overriding reasons that such a scheme cannot be accommodated.

To add further confidence to this position, the Council's own evidence base assessed the potential impacts of the Land West of Downend Road site, considering 650 dwellings on the land in association with 350 on the HA4 scheme. This forms the Council's current evidence base and has not been reassessed based on its current spatial strategy. The Council's own assessment concludes that the growth assessed (including the SGA) would be deliverable.

Moreover, the delivery of the Lane West of Downend Road site has the potential to provide a substantial contribution to addressing the infrastructure issues that the Borough faces. Particularly, the access strategy discussed in detail with FBC, HCC and HE includes the delivery of a new link road between the A27 corridor (south of M27 Junction 11) and Downend Road. This new road infrastructure will have the effect of significantly reducing traffic levels on the existing A27 corridor through Portchester and at key congestions points, particularly the Delme Roundabout, by removing traffic travelling between Portsdown Hill Road and the M27 corridor. By removing through traffic from the existing A27 corridor through Portchester, the scheme will provide a significant benefit to the operation of the existing network and will form part of the infrastructure solution for the Borough.



To concluded both sites 3130 and 3009 would provide suitable and sustainable sites to deliver new homes, whether these are required to meet the identified housing need or whether they are included in the plan to boost the supply of land for homes.



**B4a. What modifications(s) is necessary to make the Local Plan legally compliant and or sound?**

The annual requirement for Fareham should be set as at least 514 dwellings per annum in accordance with the Standard Method. This should be planned to be delivered over the plan period, without reliance on delivery later in the plan period.

Additional sites, including SHELAA site 3130 and 3009 should be allocated to help meet this requirement and the market and affordable housing need. In addition, these sites have been identified as key to helping meeting additional unmet need from neighbouring authorities. The evidence base fully supports and justifies the inclusion of this in the plan.

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

The above modifications would resolve the concerns we have with this policy of the plan.

**B4c. Your suggested revised working of any policy or text:**

The policy needs to be completed revised based on the Standard Methodology figure of 514dpa. This will need to be undertaken in liaison with neighbouring authorities who will need to assess if they can meet their needs assessed using the Standard Methodology approach.

As a result of the increased requirement, there should then be the inclusion of a new housing allocation(s) to include sites 3130 and 3009.

**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: ☒

No: ☐

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

Miller Homes should be provided with an opportunity to participate at the hearing part of the examination. The issues raised in regard to the soundness of the Draft Local Plan, in the submitted representation, require detailed examination before an independent inspector.



---

**Respondent details:**

Title:	Ms
First Name:	Jane
Last Name:	Thackker
Job Title: (where relevant)	N/A
Organisation: (where relevant)	N/A
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	No

**Please provide details you have to support your answers above**

Paras 1.1 and 3.6 States settlement identity should be preserved Para 2.12 states development should be away from spaces that contribute to settlement definition Policy HA1 contravenes these paragraphs by infilling between the village of warmish an the locks heath area

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

No infill to north and south of Greenaway Lane

**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)?**

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

---

**2) Paragraph: 1.13**

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

**Please provide details you have to support your answers above**

The opinions of over 1500 people over 21% of the population of Warmish was ignored

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

To take into account the views of the population as para 1.12 states

**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)?**

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

---

**3) 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**

There is inadequate infrastructure to cater for HA1. The GP lists are full. Hook with Warmish Primary School has a waiting list.

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

Delete HA1 from the plan or provide more GP surgeries and schools

**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)?**

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

---

**4) Paragraph: 12.16**

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

**Please provide details you have to support your answers above**

Warmish has a population of approx. 7000, 6% of the total population of Fareham Borough. Yet it is being allocated 929 houses of out 8,389 proposed which is 11%. This does not protect, preserve or enhance the character of Warmish as a conservation area.

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

Reduce significantly the number of houses allocated to Warmish.

**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

---

**Keely, Lauren**

---

**From:** Petronella Natrass [REDACTED]  
**Sent:** 17 December 2020 11:56  
**To:** Planning Policy  
**Subject:** RE: Regulation 19 Local Plan Consultation (6th November – 18th December 2020)  
**Attachments:** 2019-07-26 Fareham Local Plan Review -BHS response.pdf

Thank you for consulting the British Horse Society (BHS) on this latest stage of the Fareham Local Plan review.

The Society has no further comments at this stage, other than to reiterate our response to last summer's consultation (copy attached). The BHS remains deeply concerned about the fragmented nature of the off-road access available to the many equestrians who keep their horses within the Borough and the continuing increase in the risk and difficulty they encounter as a result of the density and speed of traffic using Fareham's roads.

**Policy NE9: Green Infrastructure** and **TIN1: Sustainable Transport** will be critical to the efficacy of this plan in improving safety, health & wellbeing and general quality of life within the Borough, and the BHS will seek every opportunity to support the Council in developing a truly inclusive Green Infrastructure and Active Travel network for ALL categories of vulnerable, non-motorised road user.

Many thanks,

Petronella Natrass

---

**From:** Planning Policy <PlanningPolicy@fareham.gov.uk>  
**Sent:** 06 November 2020 15:51  
**Subject:** Regulation 19 Local Plan Consultation (6th November – 18th December 2020)  
Dear Sir or Madam,

### **Regulation 19 Local Plan Consultation (6<sup>th</sup> November – 18<sup>th</sup> 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:

- on the Council's website at <https://www.fareham.gov.uk/localplanconsultation>
- 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<sup>[1]</sup> 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](mailto: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

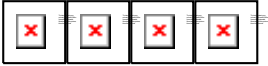
It is important that the Planning Inspector and all participants in the examination process are able to know who has given feedback on the Publication Plan. All comments received will therefore be submitted to the Secretary of State and considered as part of a public examination by the Inspector. In 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 Team  
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.

---

Petronella Natrass  
Access Field Officer, South

**The British Horse Society**



Telephone:



Website:

**Please support our programme Changing Lives through Horses.**

**Donate today to help transform a young person's life. Please consider making a donation, visit:**  
**[www.changinglivesthroughhorses.org.uk](http://www.changinglivesthroughhorses.org.uk) or text 'CLTH65 £5' to 70070 to start changing someone's life.**  
**Thank you**

This email is confidential and intended solely for the use of the individual or individuals to whom it is addressed. Any views or opinions presented are solely those of the author and do not necessarily represent those of The British Horse Society or associated companies. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing or copying of this email is strictly prohibited. If you have received this email in error please contact the sender. The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Ltd, who are authorised and regulated by the Financial Services Authority.

---

<sup>[1]</sup> <https://www.legislation.gov.uk/ukxi/2020/731/introduction/made>

26 July 2019

The Consultation Team  
Fareham Borough Council  
Civic Offices, Civic Way  
Fareham  
Hampshire  
PO16 7AZ

Dear Sirs,

## **FAREHAM BOROUGH COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION**

I am writing on behalf of the British Horse Society (BHS) in response to the current consultation on the Fareham Borough Local Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access.

### **1. BACKGROUND TO OUR COMMENTS**

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. Hampshire has among the highest densities of horse ownership in the country (*source: former National Equine Database*). We estimate that there are currently more than **87,000 horses** within the county contributing at least **£313 million each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.

A large number of these horses are kept within Fareham Borough, both at small yards and at major centres such as Crofton Manor.

**Road Safety** is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which **315 horses and 43 people were killed**. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, **3,863** horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (*NHS Hospital Episodes Statistics*)

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). Hampshire has around 3,000 miles of RoW, but only 28% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 11% to carriage



drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.

This fragmentation is particularly prevalent within the highly-populated south of Hampshire, as a result of earlier development. Research carried out by Hampshire County Council for its [Countryside Access Plan for the Solent 2008-13](#) identified that:

- **The rights of way network is particularly fragmented in this part of Hampshire**
- **There is an undersupply of access resource for horse riding and carriage driving**
- **Countryside users are forced to use or cross busy roads to link up off-road access.**

The revision of this Plan in 2015 confirmed that these findings still hold true, and the current [Countryside Access Plan 2015-25](#) (the statutory Rights of Way Improvement Plan for Hampshire) identifies ‘**Improving connectivity of the network**’ as one of the two key issues for managing access to the countryside for all users.

The Hampshire Countryside Access Forum (HCAF, an independent body whose statutory purpose is to advise local authorities and other bodies on access issues) has recently published [Equestrians in Hampshire](#), a reference guide for planners and developers. The Forum have produced this guidance because they recognise:

- a) the impacts of new developments and highway infrastructure on future safe access to the RoW network, and
- b) the lack of information currently available to decision-makers about providing for the needs of equestrians.

This guidance has been circulated to all planning authorities in Hampshire and is also attracting interest from local authorities in other parts of the country.

## **2. THE DRAFT LOCAL PLAN FOR FAREHAM**

Within the Borough of Fareham, there is both a demonstrable demand for safe access for equestrians and a documented lack of provision. The issues identified in the Hampshire [Countryside Access Plan for the Solent 2008-13](#) were confirmed by findings from a drop-in session organised by the BHS for equestrians at Crofton Community Hall in November 2017, where equestrians identified the following generic issues:

- Lack of bridleways and safe riding in and around Fareham
- Having to ride on very busy roads in order to reach safe riding
- Lack of inclusion in transport and housing development policies, especially where road improvements are being made and new roads built
- Lack of parking for horse boxes and trailers where there is access to safe off-road riding.

The results of this session were passed on to the Borough Council in our response to the Local Plan Review dated [6 December 2017](#) and it is disappointing that the current draft Local Plan does not appear to reflect these concerns. We hope that Fareham Borough Council will take the opportunity to address this in the current Review, and ask that the Plan should include:

### **a. Recognition of equestrians as vulnerable road users**

Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that

***“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”***

We therefore ask that the Local Plan includes Fareham’s equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists.

**b. Inclusion of equestrians in the emerging Fareham Active Travel Strategy**

The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.

It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that ***“horse riders...ought to be thought about in the context of active travel as well.”*** This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that ***“Active travel includes horse riders and bridle paths – this debate includes them.”***

We therefore suggest that horse-riding should be included within the emerging Fareham Active Travel Strategy and would welcome the opportunity to contribute the development of this document.

**c. Equestrians to be included in any shared-use routes, wherever possible**

In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.

The proposed development at Welborne is an example of how this can benefit the wider off-road network, providing new shared-use routes which will reconnect the wider local RoW network, together with a long-awaited shared route linking Fareham to the Meon Valley Trail.

Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current [‘Be Nice, Say Hi!’](#) campaign and with Sustrans in their ‘Paths for Everyone’ initiative.

The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)

**d. Reference to the Hampshire Countryside Access Forum (HCAF) guidance [Equestrians in Hampshire](#)**

The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.

Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county.

We would urge Fareham Borough Council to incorporate the principles set out in this guidance into their planning policy: most particularly, **that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development.** This has been the case at Welborne, where as a result the proposed new bridleways, when implemented, will restore connectivity within the wider RoW network in a way that will benefit all users, including equestrians.

### 3. CONCLUSION

The special edition of Fareham Today that has been published as part of this consultation states that **“Good growth also means providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel”.**

Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the [Changing Lives through Horses](#) initiative.

Equestrianism is a popular activity in this part of Hampshire, and one which contributes significantly to the local economy. The equestrian community in Fareham currently has many difficulties in finding safe access within the Borough, mainly as a result of past development. Many of these issues could be addressed and resolved through good planning of future development, as demonstrated at Welborne. We hope therefore that the Fareham Local Plan will include policies that will support this.

If you have any questions, or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours faithfully



Petronella Natrass  
Access Field Officer – South Region



---

**Respondent details:**

Title:	Mr
First Name:	Tom
Last Name:	Clarke MRTPI
Job Title: (where relevant)	National Planning Advisor
Organisation: (where relevant)	Theatres Trust
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

---

**1) Policy: R4 - Community and Leisure Facilities**

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 supportive of this policy and welcome that paragraph 7.31 clarifies that it applies to cultural facilities, thus conforming with paragraph 92 of the NPPF. We suggest that paragraph 7.36 (referring to part iii of the policy) sets out some criteria by which evidence of lack of need can be established.

**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:** Mike Townson [REDACTED]  
**Sent:** 14 December 2020 19:59  
**To:** Local Plan Consultation; Consultation  
**Subject:** Draft Local Plan comments

Please include my comments in the local plan consultation.

**Response to local plan**

**Comments on Development Strategy section starting p17**

1. Specific comment p25 ref Strategic Policy DS1 Development in the Countryside. Strongly support statement within the policy p24-27 additional statement : Proposals will need to demonstrate that they v. Are not on Best and Most Versatile agricultural land.
2. Specific comment Strategic Policy DS2 p27-28. Development in Strategic Gaps. My comment is that strategic gaps create false and unnecessary boundaries and these areas should be judged by other development policy criteria that can be evidenced. Many settlements in the borough have not received such protection and it would be inconsistent to make a policy that would be controversial and divisive for residents. The Meon Gap has environmental and Landscape policies that would exclude development however the Stubbington gap has no such policies and none should be created just to protect this false boundary.
3. Specific Comment on Landscape policy DS3 p28-32. Para 3.52 refers to open landscapes of the coastal plain such as at Wicor and in the Chilling area. I strongly recommend that as these two areas are compared they should be done so equally ie on the map on p30 the areas identified as being of Special Landscape Quality at Chilling include both coastal area and adjacent farmland both because of its agricultural BMV quality and as a Solent Strategic primary Support Area for Waders and Brent Geese. Therefore the area surrounding Wicor Coastal area should include the adjacent farmland which is similarly the highest quality BMV agricultural land and the same primary support areas for Solent waders and geese. Natural England in their letter of objection to FBC on development of a large section of this farmland describe it as "part of a wider countryside gap of around 40 hectares. The farmland area is a supporting habitat to the Portsmouth Harbour Special Protection Area. European sites are afforded protection under The Conservation of Habitat and Species Regulations 2017. Portsmouth Harbour is also a SSI and this farmland forms one of the last remaining agricultural areas adjacent to Portsmouth Harbour SPA." The open aspect of this farmland affords unspoiled views from the coastal path to Portsdown Hill and the Nelson Monument. Therefore please extend the current boundary for areas of special landscape quality on p30 to include the existing farmland to the north of Wicor Recreation Ground which would be fair, appropriate and equitable with the Chilling area.

Michael Townson  
[REDACTED]

The Development Strategy p28 identifies the needs and benefits of identifying Areas of Special Landscape Quality as recommended by the NPPF. Two examples are given where appeal decisions have been successful associated with landscape quality challenges. It is noted that this is not an exhaustive list and I would make a strong case to extend the Cams-Wicor strip to include the farmland that wraps around this area. Areas of Landscape Quality are shown in fig 3.3 on p35 and the Wicor area could easily and appropriately be extended to include the adjacent farmland and be included within Strategic Policy DS3 – Landscape.

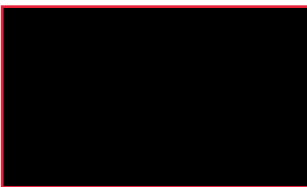
Natural England commented recently that this farmland (immediately north and adjacent to Wicor Recreation Ground) forms part of a wider countryside gap of around 40 hectares. The farmland area is a supporting habitat to the Portsmouth Harbour Special Protection Area. European sites are afforded protection under *The Conservation of Habitat and Species Regulations 2017*, as amended (the 'Habitats Regulations'). Portsmouth Harbour is also notified at a national level as the Portsmouth Harbour Site of Special Scientific Interest (SSSI).

It forms part of one of the last remaining agricultural areas adjacent to the Portsmouth Harbour SPA. The farmland is of the Best & Most Versatile quality being grade 1&2, The central farm land is a Primary Support Area as defined by the Solent Waders and Brent Goose Strategy. The open nature of this farmland allows good views from the coastal path to Potrtdown Hill and the Nelson Monument. Similarly the open nature of this coastal zone allows good views of the Portsmouth Harbour SPA/SSSI without the burden of development.

Many of the areas currently identified for landscape quality have no stronger case for inclusion than this farmland and matches similar areas such as Chilling Farm being a Primary Support Area and agricultural land adjacent to the coast.

Please give strong consideration to including the farmland surrounding Wicor Recreation Ground within this policy.

Mike Townson



**From:** [Consultation](#)  
**To:** [Planning Policy](#)  
**Subject:** Turley (on behalf of Graham Moyse) response  
**Date:** 21 December 2020 08:56:44  
**Attachments:** [FBLP representations on behalf of Graham Moyse - as submitted.pdf](#)  
[Moyse - Chapter 2.docx](#)  
[Moyse - Chapter 3.docx](#)  
[Moyse - Chapter 4.docx](#)  
[Moyse - Chapter 5.docx](#)  
[Moyse - Chapter 6.docx](#)  
[Moyse - Chapter 7.docx](#)  
[Moyse - Chapter 8.docx](#)  
[Moyse - Chapter 9.docx](#)  
[Moyse - Chapter 10.docx](#)  
[Moyse - Chapter 11.docx](#)  
[Moyse - Chapter 12.docx](#)  
[Moyse - Chapter 13.docx](#)  
[Moyse - Chapter 14.docx](#)  
[Moyse - Chapter 15.docx](#)

---

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Stuart Irvine [REDACTED]  
**Sent:** 18 December 2020 16:25  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** Fareham Local Plan - Representations on behalf of Graham Moyse  
Afternoon

Please find attached representations on the Regulation 19 Fareham Borough Local Plan to 2037 on behalf of my client, Graham Moyse.

Representations have been made in respect of the following chapters, paragraphs and policies:

- Paragraph 2.10 – Fareham Local Plan 2037 Vision
- Paragraph 2.12 – Strategic Priorities
- Paragraphs 3.4 / 3.5 – Good Growth
- Policy DS1 – Development in the Countryside
- Policy DS3 – Landscape
- Chapter 6 – Employment
- Policy E1 – Employment Land Provision
- Chapter 8 – Climate Change
- Policy CC1 – Climate Change
- Policy CC4 – Renewable and Low Carbon Energy
- Policy NE8 – Air Quality
- Policy TIN1 – Sustainable Transport



- Policy TIN4 – Infrastructure Delivery

A form for each representation has been attached, which cross refers to the main document which sets out the nature of the objection and the amendments that are sought to the submission plan.

I would be grateful for confirmation of receipt in due course.

Many thanks

Stuart

**Stuart Irvine**

Senior Director, Planning South East

## Turley



We are a CarbonNeutral® certified company.

We are working remotely wherever possible in line with Government guidance. Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance.

We support blended flexible working which means that co-owners will respond to you during their working hours and we appreciate that you will respond during your own working hours.

[turley.co.uk](https://www.turley.co.uk)

[Twitter](#)

[Linkedin](#)

Think of the environment, please do not print unnecessarily

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. Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. [Terms and Conditions](#)

# **J11 M27 – Down Barn Farm, Fareham**

Representations on the Fareham Borough Local  
Plan to 2037

Submitted on behalf of Graham Moyse

December 2020

# Contents

1.	Introduction	1
2.	Representations	3
3.	Land at J11 of the M27 (inc Down Barn Farm)	10
Appendix 1: Land at J11 of the M27 (inc Down Barn Farm).		11

Stuart Irvine



**Client**

Graham Moyse

December 2020

# 1. Introduction

- 1.1 Turley are instructed by Graham Moyse to prepare representations in respect of the Fareham Local Plan 2037 – Regulation 19 Submission Draft.
- 1.2 Graham Moyse owns land in the vicinity of Junction 11 of the M27 (known as Down Barn Farm) and as a local farmer and entrepreneur, oversees a number of valued local businesses.
- 1.3 The primary purpose of the representations is to shape the policies of the Local Plan to support the aspirations of Graham Moyse in respect of the potential that exists at Down Barn Farm.
- 1.4 The representations have been set out in Section 2 of this report and have also been submitted individually on the relevant representation forms.
- 1.5 Section 3 sets out some initial details of the potential that exists on the land at J11 of the M27 (including Down Barn Farm). Whilst these proposals are still at a formative stage, that they offer an exciting and unique opportunity to address two key development concepts, namely:
  - A dedicated electric vehicle service station and associated facilities
  - A location to accommodate business / infrastructure users that require proximity to the strategic road network
- 1.6 The location of the site at Junction 11 of the M27 is well suited to respond to such uses given its accessibility to the motorway network and its proximity to key urban areas.
- 1.7 Whilst the broad principles of the emerging Local Plan are supported, it is our view that there are two substantive omissions in terms of its content, namely:
  - Insufficient recognition is given to the need to provide infrastructure to support the growth of electric vehicle usage (including specific allocations for such facilities); and
  - There has been a failure to recognise the need for specific employment provision to accommodate users who need a high level of accessibility and are of form that is not well suited to being within the built up environment.
- 1.8 These principles are drawn out through the representation in Section 2.0, with the conclusions that:
  - The wording of several policies should be amended to more fully recognise the importance of electric vehicles and to provide support to the delivery of infrastructure that is necessary to support the establishment and growth of the electric vehicle network over the lifetime of the Local Plan.

- Greater recognition should be given within the relevant employment policies, to supporting growth in locations, such as the land at J11 of the M27, where they respond to the specific needs of users.

## 2. Representations

2.1 Representations have been made in respect of the following chapters, paragraphs and policies of the plan.

- Paragraph 2.10 – Fareham Local Plan 2037 Vision
- Paragraph 2.12 – Strategic Priorities
- Paragraphs 3.4 / 3.5 – Good Growth
- Policy DS1 – Development in the Countryside
- Policy DS3 – Landscape
- Chapter 6 – Employment
- Policy E1 – Employment Land Provision
- Chapter 8 – Climate Change
- Policy CC1 – Climate Change
- Policy CC4 – Renewable and Low Carbon Energy
- Policy NE8 – Air Quality
- Policy TIN1 – Sustainable Transport
- Policy TIN4 – Infrastructure Delivery

2.2 Each representation is by its nature an objection and consideration has been given in respect of each as to how the plan could be amended to overcome the objection.

2.3 In addition to the representations being set out below, each has also been submitted on an individual objection form.

### **Paragraph 2.10 - Fareham Local Plan 2037 Vision**

#### **Representation**

2.4 The vision is supported in general terms. However, its failure to include reference to supporting measures to address climate change is a significant oversight. Making provision for the necessary infrastructure within the Borough to support changing technologies is fundamental to addressing climate change. There are substantive changes, such as the transition of petrol to electric vehicles, which will take effect over the plan period, and the vision should reflect the need to deliver appropriate infrastructure to support that change.

#### **Amendment**

- 2.5 Add an additional statement to confirm that the Local Plan will promote the delivery of infrastructure to support infrastructure delivery that is relevant to address the climate change agenda.

### **Paragraph 2.12 – Strategic Priorities**

#### **Representation**

- 2.6 Whilst there is a strategic priority relating the climate change, it fails to recognise the need for and importance of infrastructure delivery to support key aspects such as the transition from a road network that is dominated by petrol based vehicles to one where electric vehicles are the primary vehicle mode. This transition will take place over the life of the plan period and there is a need to promote both home and network based facilities to enable this to take place. A failure to specifically reference this as a strategic priority is a clear oversight.

#### **Amendment**

- 2.7 Amend strategic priority number 11 to make specific reference to the provision of infrastructure to supports electric vehicles changing, both at home and across the highway network.

### **Paragraphs 3.4 / 3.5 – Good Growth**

#### **Representation**

- 2.8 The concept of good growth should be extended to make specific reference to highway network related infrastructure that promotes electric vehicles. Over the plan period the sale of petrol / diesel vehicles will end (2030) and the transition toward alternatives, principally electric vehicles will require the delivery of necessary infrastructure, both in homes and across the network. The promotion of good growth should include a clear and proactive intent to deliver such infrastructure.

#### **Amendment**

- 2.9 Include reference within the supporting text to the delivery of electric vehicle related infrastructure as part of measures to address climate change.

### **Policy DS1 – Development in the Countryside**

#### **Representation**

- 2.10 The policy should include an additional bullet that allows for employment related development that has a specific locational requirement, such as accessibility to the strategic road network.



- 2.11 In addition there should also be a wording amendment to bullet h), to recognise that certain infrastructure can have specific location requirements, which means that delivery is required within a countryside location.
- 2.12 Examples of such provision include facilities to serve the strategic road network (including electric vehicle charging stations) and to those forms of business where there are specific sustainable advantages to being close to roads (for example waste related activities).
- 2.13 The policy should provide sufficient flexibility to allow for due consideration to be given to infrastructure and commercial requirements and the way in which key climate change and wider sustainability can be achieved by accommodating appropriate development in the countryside. It is recognised that such uses may be limited in form, but the policy should acknowledge that such uses should be supported.

#### **Amendment**

- 2.14 Amend the policy to include reference to commercial and infrastructure based uses that have key locational requirements, such as proximity and accessibility to the strategic road network.

### **Policy DS3 - Landscape**

#### **Representation**

- 2.15 The policy is well formed, but would benefit from specific recognition that there will be forms of development that have specific locational requirements. This may include growth in locations where change in the landscape is more sensitive to change. In such circumstances, there will be means through which impacts can be appropriately mitigated. To support this, the policy should include reference to supporting development where landscape impacts are being addressed through appropriately formed landscape strategies.

#### **Amendment**

- 2.16 Amend the policy to reflect that where there are landscape impacts associated with development, growth can still be supported provided an appropriate landscape strategy (including mitigation where required) is set out.

### **Chapter 6 - Employment**

#### **Representation**

- 2.17 The approach to employment provision set out within Chapter 6 serves to faces adequately into the quantitative employment needs of the Borough over the plan period. However, there is a lack of recognition to key qualitative matters, including the need to support the demands of business that have specific location requirements and to those uses that may be displaced to accommodate other uses (particularly residential).
- 2.18 There will be businesses that demand locations that are well related to the strategic road network for example, or are for forms of development that are not well suited to

either residential areas or B1 based business locations. There does not appear to be a cogent evidence base to demonstrate how the needs of such users are to be accommodated.

- 2.19 By its nature, the quantitative approach to employment provision does not factor this in, with new employment provision being on a restricted number of sites, which are either distant from the strategic network or are focussed on office based uses. On existing sites, there has been a significant reduction of available provision as a consequence of redevelopment for other uses, particularly residential. This implication of these changes has not been addressed, with the needs of displaced uses being particularly acute.
- 2.20 To address this, the employment strategy should make specific allowance for the broad needs of business, with a positive and proactive approach to accommodating the genuine needs of economic development, with a presumption in favour of investment in employment generating development and associated infrastructure.

#### **Amendment**

- 2.21 Expand the employment section to include a policy that supports employment generating development (by way of presumption in favour) and recognises the specific location requirements of certain commercial uses, including those that have been displaced by the redevelopment of existing employment sites.

### **Policy E1 – Employment Land Provision**

#### **Representation**

- 2.22 The policy is wholly focussed on a numerical approach to employment provision, with no reference to qualitative employment needs. In addition, the new employment allocations are highly restrictive in locational terms and provide limited scope for new growth in other parts of the Borough.
- 2.23 The policy should recognise the broader employment needs that will exist within the Borough across the plan period, to ensure that opportunities for new investment are not missed, or that the qualitative and location needs of businesses can be met.
- 2.24 In this regard, the policy should be expanded to recognise that the employment requirements should not be viewed as a maximum provision and that other opportunities for employment growth should not be frustrated unnecessarily. This should take the form of a general presumption in favour of employment generating development in suitable and sustainable locations.
- 2.25 In specific terms, consideration should be given to identifying land at J11 of the M27 (including Down Barn Farm) as an employment allocation. This site is well related to the strategic road network and provides a unique opportunity to accommodate users who are dependent upon such a location. The site is also well suited to accommodate users who are also ill suited to either a residential environment or a more traditional business park location. This is reflected by its current use by the Highways Agency as a

processing facility to support the implementation of the smart motorway improvements on the M27.

- 2.26 The merits of this location are not driven by the quantitative needs as set out within the plan, but the qualitative considerations described above. The site would be of particular interest to a number of existing business who are being displaced by other major developments in the wider South Hampshire context. This is a unique opportunity that the Local Plan should embrace either by way of a specific allocation, or by creating policies that allow due consideration to be given to such development should it come forward via a planning application.

**Amendment**

- 2.27 Amend the policy to reflect the comments above.

## **Chapter 8 – Climate Change**

**Representation**

- 2.28 The climate change chapter has not been drafted with a full recognition of key consideration that are relevant to the promotion of climate change objectives. In particular, the failure to adequately reference the transition of petrol to electric vehicle based travel and its associated infrastructure needs is a major oversight.
- 2.29 The Government has committed to ending the sale of petrol and diesel vehicles by 2030, with all vehicles to be zero emission based by 2035. Both of these events are within the plan period and will require the delivery of appropriate home based and network based infrastructure.
- 2.30 It is noted that the broader plan includes policies that reference the need to integrate electric vehicle charging into new development, however, it is entirely silent on the needs to delivery supporting infrastructure across the wider transport network. This should be addressed by the provision of a specific policy within Chapter 8 that promotes the provision of key infrastructure that will support the transition of the highway network to net zero. This would include support for electric changing facilities in appropriate locations that are well related to the strategic road network.

**Amendment**

- 2.31 Include specific reference within the Chapter to the need to support the transition to a net zero highway network, with a specific policy that promotes the delivery of related infrastructure, including electric vehicle changing.

## **Policy CC1 – Climate Change**

**Representation**

- 2.32 This policy is inadequate as it fails to recognise the importance of supporting the transition of road vehicles towards net zero, which will be a key consideration over the plan period if wider Government objectives are to be achieved.

#### **Amendment**

- 2.33 Amend the policy to include a bullet point that recognises the importance of infrastructure delivery associated with the transition of the road vehicles to net zero, including appropriate supporting infrastructure.

### **Policy CC4 – Renewable and Low Carbon Energy**

#### **Representation**

- 2.34 This policy focuses exclusively on energy generating development. This is unnecessarily narrow, and indeed has been drafted in an overly negative way that fails to recognise the fundamental benefits associated with delivering such valuable forms of energy generation.
- 2.35 The policy should recognise that there will be infrastructure that serves to promote net zero, such as electric vehicles, which should be supported. This may sit in a policy of its own, but failing that, CC4 should be expanded to include the consideration of development proposals that deliver such infrastructure, but with a more generous presumption in favour of such development, rather than the overly restrictive approach that is currently cast within the policy.
- 2.36 This restrictive approach has been driven by the perception that uses such as solar farms and wind farms imply significant impacts (particularly visual). This is not the case of all forms of net zero and progressive technologies and the policy should make a clear distinction in that regard.

#### **Amendment**

- 2.37 Unless addressed in a policy of its own right, CC4 should be amended to include reference to other forms of infrastructure that promote net zero related technologies, such as electric vehicle charging. In making these amendments, the policy text should be recast to recognise that these technologies are different to those energy generating uses that are perceived to have significant visual impacts. This should be reflected by a general presumption in favour of the delivery of lower impact infrastructure.

### **Policy NE8 – Air Quality**

#### **Representation**

- 2.38 The references within this policy to the promotion of electric vehicle charging infrastructure is welcomed. However, this is focussed exclusively on provision within new developments. This is insufficient to meet the infrastructure needs required to service the transition of petrol / diesel vehicles to net zero emissions based vehicles over the period to 2025.
- 2.39 Whilst home based infrastructure is appropriate, it does not address the key consideration of charging facilities within the wider highway network, particularly in terms of users who are travelling across the strategic road network where there is a substantive issue regarding the ability to recharge when on longer journeys or where access to home based infrastructure is not available.

- 2.40 In this respect, unless addressed elsewhere in the plan, policy NE8 should include provisions that support the delivery of electric vehicle charging infrastructure to serve the wider strategic road network.

**Amendment**

- 2.41 Amend the policy as suggested above.

**Policy TIN1 – Sustainable Transport**

**Representation**

- 2.42 This policy is premised on the basis of the promotion of non-car based means of travel. This is commendable but does not adequately recognise that the transition towards net zero emissions based vehicles will also make a valuable contribution towards more sustainable transport patterns. Given the timescales associated with this transition (over the period to 2035), there should be strong support within TIN1 to the delivery of infrastructure that enables this transition.

**Amendment**

- 2.43 Amend to include reference to the role of electric vehicles as a sustainable mode of transport and to provide support for appropriate infrastructure to facilitate their delivery.

**Policy TIN4 – Infrastructure Delivery**

**Representation**

- 2.44 This policy focuses wholly on ensuring that infrastructure that supports new development is delivered in a timely manner. This is supported but it fails to address the need for the delivery of wider infrastructure, particularly that which stems from the objectives set out within the Climate Change chapter (and also reflecting our representations on the policies in that chapter).
- 2.45 The policy should be broadened in its intent to incorporate a focus on ensuring that this wider infrastructure is delivered alongside new development to ensure that core climate change objectives are capable of being met. This implies an imperative to support the early delivery of such infrastructure within the early parts of the plan period.

**Amendment**

- 2.46 Amend to include reference to the timely delivery of wider infrastructure, particularly that which is crucial to supporting climate change related objectives.

### 3. Land at J11 of the M27 (inc Down Barn Farm)

- 3.1 The land at J 11 of the M27 comprises the land immediately adjacent to the motorway junction (to the north and north east) extending up to Boarhunt Road. The site currently accommodates a number of users, including a park & ride and strategic base for the Highways England in undertaking the smart motorway improvements that are currently underway.
- 3.2 A plan showing the location of the site is attached at Appendix One.
- 3.3 This site offers a unique opportunity to respond to a range of development needs, including those that require a location that is directly related to the strategic road network, or to accommodate users that are not well suited to either a residential environment or a business park.
- 3.4 A number of potential forms of development are appropriate for this location, including:
- Service facilities to serve the M27, including scope for an electric vehicle charging station.
  - Uses of a similar form to those that are currently in place to meet the needs of Highways England – such as processing of building / waste materials.
  - Displaced users who require relocation away from other sites that are being redeveloped for other uses or are allocated for such development. This is particularly relevant to locations such as Tipner where the sites development will require a number of business to relocate to alternative sites that meet their needs.
  - Other uses that require accessibility to the strategic road network.
- 3.5 The site can be developed in an appropriate manner, incorporating a strong landscape framework and measure to promote biodiversity gain. The ability of the site to accommodate significant development without giving rise to undue impacts is currently being demonstrated by the scale of existing activity on site.
- 3.6 Further details to support the promotion of the site in the manner outlined above are currently in preparation and we would welcome the opportunity to consider how the Local Plan can support its delivery.

## Appendix 1: Land at J11 of the M27 (inc Down Barn Farm).







# 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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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).

Chapter 6

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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).

Chapter 8

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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).

2.10

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

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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).

2.12

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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).

3.4 and 3.5

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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 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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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 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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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 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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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

DS3

**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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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 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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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

NE8

**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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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 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 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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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:

Graham

Last Name:

Moyse

Job Title:

Organisation:

Address: Postcode:

See Agent

Telephone Number:

See Agent

Email Address:

See Agent

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

Title:

Mr

First Name:

Stuart

Last Name:

Irvine

Job Title:

Senior Director

Organisation:

Turley

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

TIN4

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

See attached

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?

See attached

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

See attached

B4c Your suggested revised wording of any policy or text:

See attached

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 objection raised is a significant matter and there would be benefit with further discussion of the issues to understand the way in which the plan could be amended to reach a more positive position.

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.

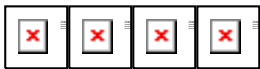
**FAREHAM**  
BOROUGH COUNCIL

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 18 December 2020 12:10  
**To:** Planning Policy  
**Subject:** Turley (on behalf of Reside Developments LTD) consultation response  
**Attachments:** Fareham LP Reg19 Representation Form.pdf; Representations to Fareham Local Plan 2037.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Alison Young <[REDACTED]>  
**Sent:** 18 December 2020 11:24  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** Representations to Publication Version of the Local Plan

Dear Sir / Madam

Please find attached representations to the Publication Version of the Fareham Local Plan 2037 on behalf of Reside Developments Ltd.

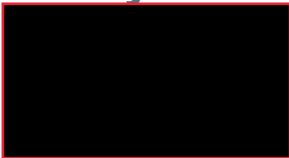
I would be grateful if you could confirm receipt of these representations.

Please do not hesitate to contact me if you have any queries.

Kind regards  
Alison

**Alison Young**  
Senior Planner

**Turley**



We are a CarbonNeutral® certified company.

We are working remotely wherever possible in line with Government guidance. Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance.

We support blended flexible working which means that co-owners will respond to you during their working hours and we appreciate that you will respond during your own working hours.

**turley.co.uk**

Twitter

Linkedin

Think of the environment, please do not print unnecessarily

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.

Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387  
Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

# 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)

Reside Developments Ltd

Address:

Postcode:

Telephone Number:

Email Address:

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

Title:

Mrs

First Name:

Alison

Last Name:

Young

Job Title: (where relevant)

Senior Planner

Organisation: (where relevant)

Turley

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

Various, see attached letter

B1c Which part of the Policies Map?

Strategic Gaps, ASLQ, HA10 allocation. See attached letter

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 checked="" type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see attached 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 attached letter

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

Please see attached letter

B4c Your suggested revised wording of any policy or text:

Please see attached 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):

To participate in the discussion around strategic issues and assist in addressing the concerns raised in our 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

18 December 2020  
**Delivered by email**

The Consultation Team  
Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
PO16 7AZ

Ref: RESS3014

Dear Sir / Madam

## **REPRESENTATIONS TO FAREHAM LOCAL PLAN 2037**

These representations to the Publication Version of the Fareham Local Plan 2037 are made on behalf of Reside Developments Ltd ('Reside') in relation to the land they control at Funtley. This includes the site to the south of Funtley Road ('Funtley South') which is the focus of these representations and is identified as a proposed allocation under policy HA10.

### **Background**

The Funtley South site was initially proposed as an allocation with an indicative capacity of 55 dwellings within the Draft Local Plan during the consultation held in 2017. In addition to residential development, Policy HA10 also showed a substantial area of new open space to the south of the site between the developable area and the M27 motorway.

Since then, a number of planning applications have been made in relation to this site, (detailed in full at Appendix 1); notably:

- Outline planning permission being granted in September 2020 (ref. P/18/0067/OA) for residential Development of up To 55 Dwellings (Including 3 Custom-Build Homes) (Use Class C3), Community Building Incorporating a Local Shop 250 Sqm (Use Classes A1, A3, D1 & D2), Accesses And Associated Landscaping, Infrastructure And Development Works.
- Full planning permission granted in October 2018 (ref. P/18/0066/CU) for a change of use of an area of land containing the Public Open Space Allocation and an additional parcel of land to the east to form a new Community Park.

Since these approvals, two further applications were submitted on 6<sup>th</sup> October 2020, both of which are currently under consideration:



- Outline application to provide up to 125 one, two, three and four-bedroom dwellings including 6 self or custom build plots, community building or local shop (use class E & F.2) with associated infrastructure, new community park, landscaping and access, following demolition of existing buildings. (Ref: P/20/1168/OA)
- Change of use of land from equestrian/paddock to community park following demolition of existing buildings. (Ref: P/20/1166/CU)

The thrust of our representation is that the Publication Version Local Plan does not plan to meet the council's minimum local housing need as required by national planning policy. We set out how land south of Funtley Road can assist in delivering a higher number of dwellings on-site, by appropriately increasing the density of the proposal and extending the site boundary slightly further to the south, while still providing a significant benefit in the form of a community park. This proposal is detailed in the two live planning applications - P/20/1168/OA and P/20/1166/CU.

We have previously submitted representations on behalf of Reside to the Local Plan Supplement in February 2020, the Local Plan Issues and Options consultation in the summer of 2019, as well as earlier consultation on the Draft Local Plan in 2017. In these representations we were supportive of the council's acknowledgement that the Borough has an increased housing need but noted that additional housing, including on existing sites and proposed allocations, would need to be identified to meet this higher need.

The continual identification of this site has been supported, and evidence provided by Reside in response to these consultations showed that the Funtley South site was capable of accommodating additional dwellings to meet the housing need without any adverse impacts to character or landscape. It is disappointing that the Publication Version has not reflected these previous submissions and it remains unclear if they have informed this current consultation.

## REPRESENTATIONS

### **Strategic Policy DS2: Development in Strategic Gaps**

DS2 seeks to prevent development which will significantly affect the integrity of the gap and the physical and visual separation of settlements. This policy seeks to introduce a new strategic gap in the vicinity of our clients' interests, without justification. The Policies Map illustrates that the proposed allocation lies outside of the strategic gap, however this does not fully reflect the boundary of Reside's proposal as per the live planning application P/20/1168/OA, where the application site's southern edge falls within the area proposed as Strategic Gap under policy DS2.

The Council's Technical Review of Areas of Special Landscape Quality and Strategic Gaps does not provide justification for this boundary and merely states that *"Wrapping the gap boundary tightly around the settlement (and future approved development), would allow Funtley to expand moderately, but still retain its separate identity and not become contiguous with North Fareham."* The evidence base appears to entirely ignore the detailed submission made in our previous representations. We therefore resubmit these with this submission at Appendix 3.

We submit that there is no need for the identification of a new strategic gap in this locality. The evidence base does not support it, and having considered the site against the adopted Landscape Character Assessment and policy context, there is no reason to conclude that the site has any elevated landscape status or importance above the rest of the surrounding landscape within the proposed Strategic Gap. Moreover, there is no extant designation such as public open space that would elevate the status in terms of local community association.

The site's intrinsic character in a landscape sense does not preclude development, the nature of which could incorporate elements of the landscape into a sensitively designed scheme.

Were the Council to continue to seek to impose a new Strategic Gap in this location, and not withstanding our submissions against this approach, we would request amending the Strategic Gap boundary to reflect the site boundary of the live application P/20/1168/OA, as illustrated at Appendix 2. This would ensure that the aims of policy DS2 are achieved as it would allow Funtley to expand moderately, but also retain its own identity and it would not coalesce with North Fareham. This would be guaranteed by the provision of the community park proposed through application P/20/1166/CU. This will be transferred to the council, so there is no need to designate that area as Strategic Gap.

## **Strategic Policy DS3: Landscape**

DS3 allows for development in areas of special landscape quality only where the landscape will be protected and enhanced. The Policies Map shows the proposed area of special landscape quality as following the boundary of the proposed allocation, and in the same way as the strategic gap designation, this does not correspond with the boundary of our client's site as per the live planning application P/20/1168/OA. The site's southern edge falls within the proposed Area of Special Landscape Quality 4 (ASLQ 4) Meon Valley under policy DS3.

We submitted a Technical Note in relation to the proposed Meon Valley ASLQ alongside our representations to the Fareham Local Plan Supplement in February 2020. This is reattached at Appendix 3. It supports our objection to the boundary of ASLQ 4 Meon Valley taking in land to the east of the disused railway known as the Deviation Line.

The council's Technical Review of Areas of Special Landscape Quality and Strategic Gaps does not provide justification for inclusion of this land in ASLQ 4. In describing the special landscape qualities of the Meon Valley, the report emphasises the southern part of the proposed designation; *"The area has high scenic quality and topographic and visual unity, particularly in the lower reaches."* The report notes that the *"Major road and rail corridors pass through the upper section, but much of the area retains a sense of seclusion."* This area has its tranquillity impacted by the M27 to the south and the active Eastleigh to Fareham Railway line to the east.

It is important the ASLQ boundaries do not incorporate areas that could form allocations, as it could unduly restrict developable areas and affect housing supply numbers. ASLQ 4 around Funtley does not seem to relate to those in the LDA 2017 report, nor the current Local Plan. The boundary for the Meon Valley ASLQ should be delineated by the Deviation Line to the west of Funtley, rather than cross over it.

The area affected is largely proposed for a community park under application P/20/1166/CU and therefore can make a significant contribution to the landscape throughout the plan period; however, there is no justification for it being included within the ASLQ boundary as it stands. Any such designation must be robust, clearly defined and supported by evidence. As currently drafted, it is not, and therefore it is unsound as it is not justified.

## **Strategic Policy H1: Housing Provision**

Policy H1 does not make provision for sufficient housing to meet local needs. The policy is based on delivering a level of housing set out in the consultation draft revised standard methodology (August 2020), of 403 dpa. This was never adopted policy and should not have been used as the basis for the Regulation 19 Draft Local Plan. The National Planning Practice Guidance sets out the current standard methodology and produces a minimum need of 514 dpa for Fareham Borough.

On 16<sup>th</sup> December 2020, the Government published the response to the consultation on the standard method for assessing local housing need. In a statement, the Secretary of State for the Ministry of Housing Communities and Local Government said, *“we plan to leave the standard method as it was created in 2017 for the majority of the country.”* The Government’s published response to the consultation indeed confirms that Fareham’s local housing need is 514 dpa.

Therefore, policy H1 is unsound as it is not positively prepared, providing a strategy which, as minimum seeks to meet the areas objectively assessed needs and it is not in accordance with national policy, NPPF paragraph 60.

Futhermore, policy H1 does not fully address the duty to co-operate in terms of meeting the unmet of needs of more constrained local authorities within the housing market area. H1 is therefore not effective on cross-boundary strategic matters.

In the Local Plan Supplement (January 2020), FBC set out a strategy to deliver 520 dpa, and it is considered that the Local Plan 2037 which is the subject of this Regulation 19 consultation, rows back significantly from the ambitions for sustainable growth that were outlined in the earlier strategy.

The implications of not planning for sufficient housing are significant and will no doubt be debated at the Examination hearings. We set out below how land at Funtley South could assist in helping to deliver a higher level of housing.

**Housing Allocation Policy HA10:** proposes to allocate 5.74ha of land at Funtley Road South for 55 dwellings.

Paragraph 117 of the NPPF requires planning policies to encourage the effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraphs 122 and 123 set out policy on achieving appropriate densities. They state that *“Planning policies and decisions should support development that makes efficient use of land,”* and *“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 that developments make optimal use of the potential of each site.”*

Policy HA10 is not consistent with national policy in this regard as it does not make most efficient use of land. As stated in our representations to previous Local Plan consultations, we consider the council is missing an opportunity by not making additional use of proposed allocation at Funtley Road South to address the Borough’s housing need. In addition, it is missing an opportunity to protect sensitive areas of the borough from potential development.

By proposing to allocate the site and the recent grant of planning permission for 55 dwellings, the council has indicated it considers the site to be sustainable, and this is supported by the Sustainability Appraisal. We contend that the indicative yield should be amended to 125 dwellings and the site boundary should be realigned, as illustrated in Appendix 2, to incorporate some additional land to the south. This would result in a site size of 6.23 hectares. The live planning application P/20/1168/OA provides evidence to justify this.

Specifically, in relation to the live planning application for 125 dwellings on the larger site area:

- The Illustrative Masterplan demonstrates how the development of up to 125 dwellings, community building or local shop with associated infrastructure, new community park,



landscaping and access, could be accommodated on the proposed larger site in a sustainable way (Appendix 4)

- The Landscape and Visual Appraisal (Appendix 5) concludes that an appropriate development can be provided without substantial harm to landscape or views, but which provides a number of community and landscape benefits.
- The Ecological Assessment demonstrates that there are no adverse effects on any designated sites or protected species resulting from a development of 125 dwellings on a larger site area and also sets out appropriate mitigation and enhancement measures.
- The Transport Assessment concludes that the proposed development is considered to be acceptable in transport policy terms and meets with national and local policy criteria. The assessment work undertaken has indicated that there would be no demonstrable harm arising from the proposed scheme and there are no identifiable severe impacts. The Travel Plan includes a range of measures to maximise sustainable transport opportunities.
- All other reports and supporting documentation, including in relation to trees, flood risk, contamination, noise, sustainability, utilities, and archaeology demonstrate that the site can accommodate 125 dwellings.

Policy HA10 sets out 11 site-specific requirements (a-k). A number of these criteria are not sound and we have explained why in the table below.

<b>a) The quantum of housing proposed should be broadly consistent with the indicative site capacity; and</b>	Unsound, for the reasons set out above.
<b>b) Primary highway access should be from Funtley Road; and</b>	Sound. In accordance with consented development and live application.
<b>c) Building heights are limited to a maximum of 2 storeys; and</b>	Unsound as this is not justified by evidence. This is better determined at the detailed planning application (reserved matters) stage. Policy D1 will provide an adequate framework to ensure building heights are acceptable. This criterion should be deleted.
<b>d) Safe pedestrian and cycle crossing points across Funtley Road and connectivity with the existing footpath/bridleway network in the vicinity of the site and eastwards towards the centre of Funtley village in order to maximising connectivity to nearby facilities and services; and</b>	Sound. In accordance with consented development and live application.
<b>e) The creation of a vehicular loop road on the site, allowing for pedestrian and cycle permeability across the site; and</b>	Unsound as this is not justified or effective. It is not clear what is meant by a vehicular loop road. The requirement for pedestrian and cycle permeability across and through the site is supported.

<b>f) Proposals shall take account of the site's landscape context by incorporating view corridors from Funtley Road through to the public open space allocation to the south of the residential allocation. The view corridors should form part of the on-site open space and should incorporate pedestrian and cycle links, whilst vehicular crossing of links should be limited; and</b>	Sound. In accordance with consented development and live application.
<b>g) The existing woodland on-site shall be retained and incorporated within the design and layout of proposals in a manner that does not impact on living conditions or prevent damage to any nearby dwellings, roads, footpaths or other infrastructure; and</b>	Sound. In accordance with consented development and live application.
<b>h) A landscape buffer shall be incorporated between development and the Great Beamond Coppice SINC to the east of the site; and</b>	Sound. In accordance with consented development and live application.
<b>i) The provision of a building/ buildings for community uses, located in an accessible location to enable a range of uses for both existing and new residents; and</b>	Sound. In accordance with consented development and live application.
<b>j) The site is identified as a mineral safeguarded site (brick clay is likely to underlay site). A Minerals Assessment will be required prior to any development in accordance with the Hampshire Minerals and Waste Plan (2013); and</b>	The site benefits from an extant outline permission. No such conditions are required under that consent, or were requested during the determination. This requirement is therefore not considered necessary or reasonable, and should be deleted.
<b>k) Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4 and NE3.</b>	Sound, although it should be recognised that contributions towards some forms of infrastructure are provided for by CIL.

We would very much welcome the opportunity to work with the council to address these concerns and amend the criteria where possible, and therefore would wish to attend the Examination hearings.

## **HP1: New Residential Development**

This policy allows for new residential development within the urban area boundary as shown on the Policies Map. Our representation relates to the proposed urban area boundary at Funtley South, which should be amended to incorporate the site boundary proposed under application P/20/1168/OA. Evidence submitted with this application demonstrates that this would result in sustainable development. Furthermore, it would enable the site to contribute a greater level of housing to meet Fareham's housing land supply.

## **HP4: Five Year Housing Land Supply**

This policy is supported, however, we would urge the council to consider increasing the number of homes proposed for allocation at Funtley South through Policy HA10 as a way of contributing to addressing the current deficit in five-year housing land supply within the Borough. The Publication Version Local Plan could do more to address the shortfall in the short term.

## **HP5: Provision of affordable housing**

The policy requirement at criterion iii is unsound as it is not consistent with national policy. Paragraph 64 of the NPPF 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 overall affordable housing contribution. The draft policy only requires 10% of all affordable housing to be available for affordable home ownership.

## **HP9: Self and Custom Build Homes**

The Self and Custom Build Housing Background Paper (FBC, 2020) indicated that only 56 people wished to remain on the council's register. 40 of those said they would consider a plot on a larger self-build development and only 25 said they would consider a serviced plot on a standard development. This evidence indicates that demand for self and custom build often arises on smaller sites, so focusing delivery of self/custom build on sites of over 40 homes, may not respond to demand. 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.

We would suggest that 5% is a more reasonable level to apply to larger sites, as this would allow for self and custom build to come forward on these sites, but also for self and custom build homes to be delivered on smaller sites too. Reside have proposed to deliver six self-build units on land south of Funtley Road, which will assist the council in meeting its obligation with regard to those who wish to develop their own homes.

## **NE2: Biodiversity Net Gain**

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 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.

## **NE8: Air Quality**

The policy requires one EV Charge Point per dwelling. The Government has made a commitment to end the sale of new petrol and diesel cars in the UK by 2030. With this in mind, we would suggest that the council consider a phased introduction of the EV Charge Point requirement, gradually ramping up to 100% provision, given that there is currently not the demand.

## **CONCLUSION**

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:

- The Plan is not positively prepared or consistent with national policy as it does not seek to meet the areas' objectively assessed needs
- The boundaries of the proposed Strategic Gap and Area of Special Landscape Quality are not justified
- The proposed allocation policy HA10 is not fully justified because it does not take into account the reasonable alternative of a delivering a higher number of dwellings
- A number of the specific policy requirements are not justified or effective

Funtley South is a sustainable and deliverable site in its own right, but also has synergy with the key strategic site at Welborne, were this to come forward. The Funtley South site was previously identified in the Draft Local Plan as having an indicative capacity of 55 dwellings. The allocation of the site and its recent planning permission clearly demonstrates the residential proposals for the site represents sustainable development, there are no constraints that would preclude this development at the higher number of dwellings and the site is deliverable in the short term.

Evidence provided by Reside demonstrates the site is capable of comfortably accommodating more dwellings without any adverse impacts to character or landscape. This can be achieved through a combination of a 0.4ha increase in the developable area and an increase in density (to match that surrounding the site). Funtley South can therefore do even more to help the Council meet its increased housing requirements and we would of course be pleased to provide any further information to the Council, if so required, with regards to this matter.

We would like to participate in the Examination hearings so that a full discussion can be held on these matters.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and Examination.

Yours faithfully



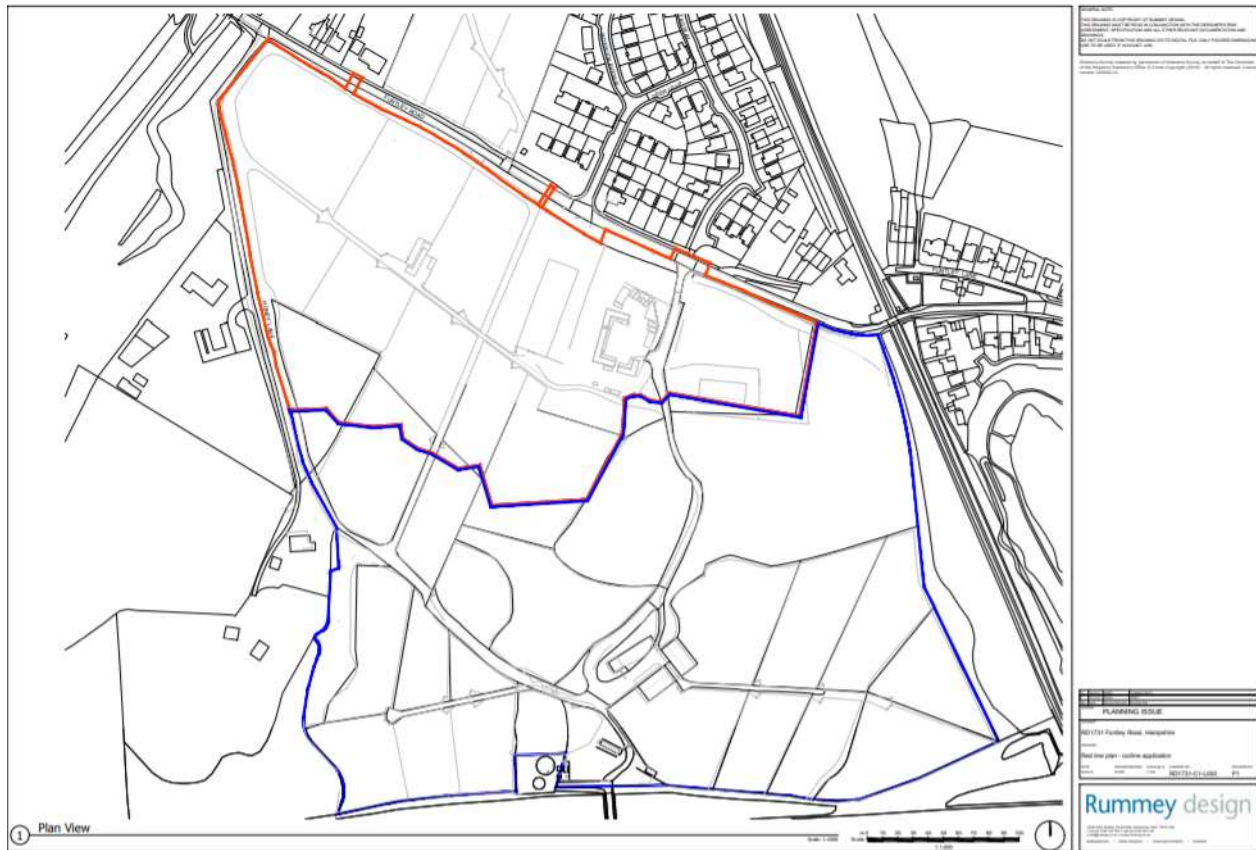
Alison Young  
**Senior Planner**

[alison.young@turley.co.uk](mailto:alison.young@turley.co.uk)

## Appendix 1: Planning Applications on Land South of Funtley Road

Application Reference	Description	Status
P/20/1168/OA	Outline Application To Provide Up To 125 One, Two, Three And Four-Bedroom Dwellings Including 6 Self Or Custom Build Plots, Community Building Or Local Shop (Use Class E & F.2) With Associated Infrastructure, New Community Park, Landscaping And Access, Following Demolition Of Existing Buildings.	Submitted 6 <sup>th</sup> October 2020 Under consideration
P/20/1166/CU	Change Of Use Of Land From Equestrian/Paddock To Community Park Following Demolition Of Existing Buildings	Submitted 6 <sup>th</sup> October 2020. Under consideration
P/20/0809/FP	Installation Of Haul Road (Retrospective)	Approved 9 <sup>th</sup> November 2020
P/19/0290/FP	Provision of a Permissive Footpath Link and New Surfacing from Funtley Road over the M27 Motorway Connecting to Footpath Public Right Of Way 91A and associated Bridge Improvement Works.	Approved 20/06/2019
P/18/0066/CU	Change of Use of Land from Equestrian/Paddock to Community Park Following Demolition of Existing Buildings.	Approved 12/10/2018.
P/18/0067/OA	Outline application for residential Development of up To 55 Dwellings (Including 3 Custom-Build Homes) (Use Class C3), Community Building Incorporating a Local Shop 250 Sqm (Use Classes A1, A3, D1 & D2), Accesses And Associated Landscaping, Infrastructure And Development Works.	Approved 02/09/20.
P/17/1539/EA	Request For Screening Opinion Under The Town & Country Planning (Environmental Impact Assessment) Regulations 2017 For Proposed Residential Development Of Up To 55 Dwellings, Community Building, New Country Park And Associated Landscaping & Infrastructure on Land To The South Of Funtley Road, Funtley.	January 2018. No Environmental Statement Required.

## Appendix 2: Suggested Site Allocation Boundary for HA10: Land South of Funtley Road



## **Appendix 3: Technical Note re Proposed Meon Valley Area of Special Landscape Significance**



REPRESENTATIONS TO FAREHAM  
LOCAL PLAN 2036 SUPPLEMENT  
CONSULTATION

Technical Note re proposed Meon  
Valley Area of Special Landscape  
Quality (ASLQ)

February 2020

Rummey **design**





Meon Valley

Deviation Line - bridleway & open space

Funtley North

main railway line

proposed Welborne garden village

Funtley South

Funtley

M27

North Fareham



# Introduction

This Technical Note is prepared in support of representations to the Fareham Local Plan 2036 Supplement consultation and is made on behalf of Reside Developments Ltd (Reside) in relation to the land they control at Funtley. This includes the site to the south of Funtley Road (Funtley South) which is the focus of these representations and is identified as a proposed allocation.

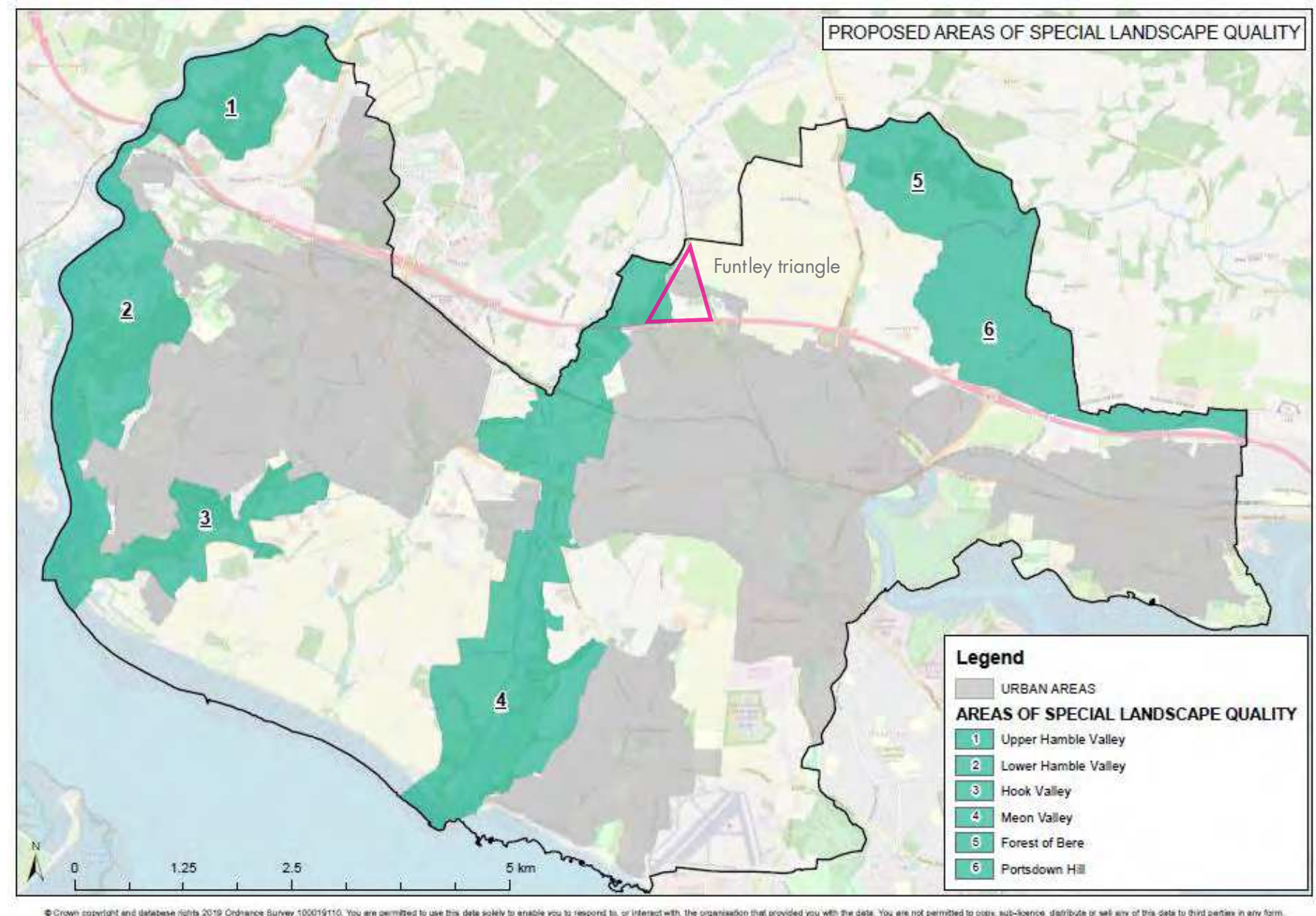
Fareham Borough Local Plan to 2036 proposes an Area of Special Landscape Quality (ASLQ) in the Meon Valley, along with other river valleys and Portsdown Hill. The policy states that there will be a presumption against major development in such areas unless it can be demonstrated that the quality and distinctiveness of the landscape will be conserved. The Meon Valley is also a Strategic Gap and the ASLQ will offer an additional level of protection, although the policies would now differentiate between the need to retain settlement identity and conserve landscape character.

Figure 4.2 in the FBC consultation document identifies indicative proposed Areas of Special Landscape Quality to be protected through Policy NEXX: Landscape. However, whilst this proposed policy is intended to guide development in such areas, there is no definition on what merits an area being included in an ASLQ, other than that it has been identified as a 'valued landscape' in consultation. It would be reasonable to assume that the ASLQ would be underpinned by Landscape Character Assessment evidence, the latest version of which is LDA Design's Fareham Landscape Assessment, 2017.

The assessment notes that in Fareham Borough it is the chalklands, coastal plains, river valleys and coast that provide the broad framework for the complex and distinctive landscape character within the Borough. We would agree that these broad 'framework' landscapes shape the character of the Borough and that, where they have special qualities and high sensitivity, these should be conserved. However it is important to define the extent of these areas in a robust manner.

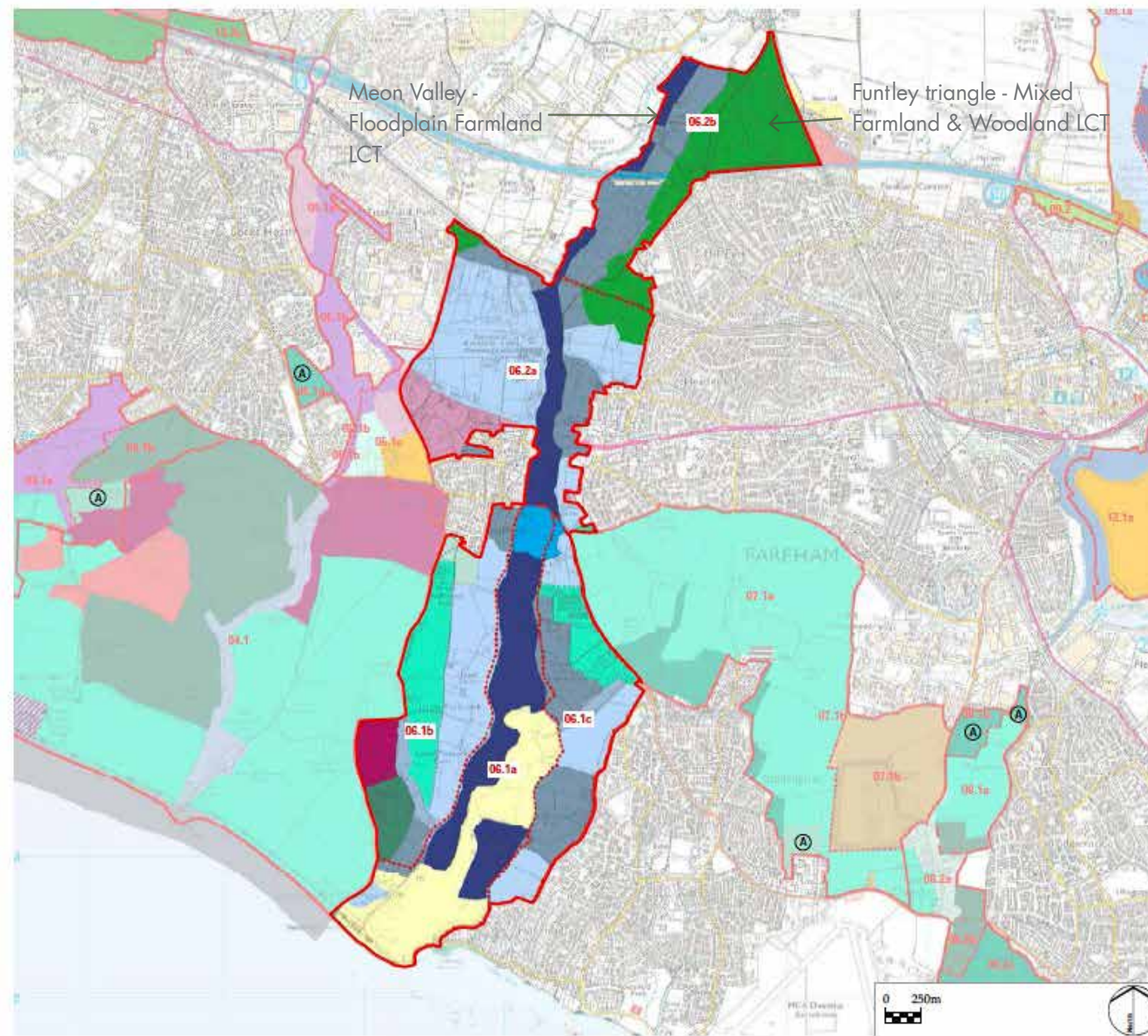
The mapping of the Upper Meon Valley ASLQ in relation to the Funtley triangle, which lies at the northern end of the Borough is however unclear, due to the low resolution of the indicative map. The ASLQ appears to include some land to the east of the disused railway (known as the Deviation Line) in the area south of Funtley Road, an area already proposed for housing allocation. We propose that the ASLQ should extend only to the Deviation Line for the reasons set out below.

**Figure 4.2. Proposed Areas of Special Landscape Quality**



*Area 4 represents the indicative proposed Meon valley ASLQ (reproduced from FBC Local plan 2036 supplement). The proposed Meon Valley ASLQ appears to extend into the Funtley 'triangle' which is a fringe landscape and does not share the special landscape qualities or character of the Meon Valley to the west*





#### LEGEND

- Landscape Character Area
- Local Landscape Character Area
- Local Landscape Character Area Subdivision

#### Landscape Types

- |   |  |
|---|--|
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #2e8b57; border: 1px solid black;"></span> Mixed Farmland & Woodland: Small Scale    | <span style="display: inline-block; width: 15px; height: 15px; background-color: #add8e6; border: 1px solid black;"></span> Small Scale Enclosed Valley        |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #d8bfd8; border: 1px solid black;"></span> Horticulture & Smallholdings: Small Scale | <span style="display: inline-block; width: 15px; height: 15px; background-color: #191970; border: 1px solid black;"></span> Open Floodplain Farmland           |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #800080; border: 1px solid black;"></span> Horticulture & Smallholdings: Large Scale | <span style="display: inline-block; width: 15px; height: 15px; background-color: #00bfff; border: 1px solid black;"></span> Enclosed Floodplain Farmland       |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #00ced1; border: 1px solid black;"></span> Open Coastal Plain: Weak Structure        | <span style="display: inline-block; width: 15px; height: 15px; background-color: #ffff00; border: 1px solid black;"></span> Marsh, Reedswamp & Brackish Lagoon |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #2f4f4f; border: 1px solid black;"></span> Open Coastal Plain: Strong Structure      | <span style="display: inline-block; width: 15px; height: 15px; background-color: #a9a9a9; border: 1px solid black;"></span> Enclosed Valley Side               |
| <span style="display: inline-block; width: 15px; height: 15px; background-color: #7fffd4; border: 1px solid black;"></span> Open Coastal Plain: Fringe Character      | <span style="display: inline-block; width: 15px; height: 15px; background-color: #add8e6; border: 1px solid black;"></span> Open Valley Side                   |

LCA6 Meon Valley Landscape Character Area (LCA) and detailed Landscape Character Types (reproduced from LDA Landscape Assessment report). This map clearly distinguishes between the Meon Valley Floodplain Farmland LCTs and the Mixed Farmland and Woodland LCT that includes the Funtley triangle, to the east. The character transition appears to be to the west of the railway line and includes the woodland associated with the railway within the Mixed Farmland & Woodland LCT. The railway also physically and visually separates the valley from the fringe land to the east.

## Fareham Borough Council's evidence

The Borough of Fareham has a complex landscape consisting of mixed rural valleys, coastal plain, farmland and woodland and extensive built-up areas, as well as the M27 motorway and railway lines which cross the Borough. The most recent Landscape Assessment undertaken by LDA Design, and published in 2017, recognises the intrinsic character and distinctiveness of the relatively undeveloped areas of the Borough. It would be expected that this would be the evidence base for the proposed ASLQs, since these are based on landscape character and its key qualities and sensitivity. It is stated that the ASLQs will not include any development allocations.

The proposed extent of the Meon Valley ASLQ, the upper reaches of which lie to the west of the Funtley Road triangle, is stated to be based on the landscape types (LCT) defined within the original county-wide landscape assessment produced by Hampshire County Council in 1993. The assessment identified ten detailed, rural landscape types within Fareham Borough and this formed the basis for the initial landscape characterisation and the subsequent update in the LDA Design 2017 Fareham Landscape Assessment.

This assessment clearly differentiates between the 'Mixed Farmland and Woodland: small scale' LCT, which includes the Funtley 'triangle' up to and including the wooded Deviation Line to the west, and the landscape types in the Meon valley which include both 'Open and Enclosed Floodplain Farmland' LCTs. The Borough Landscape Assessment notes that the Mixed Farmland and Woodland LCTs vary in scale from large to small scale and describes the 'fringe' character of the Mixed Farmland and Woodland along the M27 corridor (p40). The M27 corridor defines the southern edge of the Funtley triangle.

The Fareham Landscape Assessment further defines a number of Landscape Character Areas (LCAs), which consist of several landscape types to produce identifiable areas of landscape of consistent character. The Meon Valley (LCA6) is further subdivided into Lower and Upper Meon Valley since its characteristics, influences and function vary significantly between the upper, more tightly contained, inland reaches and the wider, lower, river valley which traverses the coastal plain.

The proposed Meon Valley ASLQ boundary appears to include only selected areas of LCA6 consisting of all or parts of a number of different landscape character types. This is presumably based on a recognition that the landscape quality varies significantly within the LCA, although how the ASLQ boundary has been defined is not explained.

The character variance is highlighted in the Fareham Landscape Assessment. Whilst including the area around Funtley within the Meon Valley LCA6 it specifically notes that part of the Upper Meon valley (LCA 06.2b) on the eastern valley sides are '*typically subdivided into paddocks for horse grazing, bounded by open fences and containing various shelters and small-scale structures. In themselves these have a somewhat scruffy, fringe character*'. The assessment also recognises the role that extensive woodland plays in integrating these fringe uses.

The assessment also specifically refers to the existing housing along Funtley Road as a '*rather anomalous area of recent residential development off the Funtley Road in the northern tip of Area 06.2b. Lying on the opposite side of the railway this has little visual connection to the settlement of Funtley and is out of character with the surrounding landscape*'.

In summarising the development opportunities in the LCA it also notes that there is an opportunity to develop pockets of residential development, such as off Funtley Road, as long as these can be sensitively integrated into the landscape.

FBCs own evidence base clearly implies that the Funtley triangle is suitable for sensitive development and does not exhibit the landscape qualities or visual connection to the Meon Valley that might warrant its inclusion in the ASLQ.

The proposed indicative boundary, on this basis appears to be arbitrary and does not reflect Fareham's Landscape Character and sensitivity assessment.



## Landscape of the Meon Valley

In considering the special qualities of the Meon Valley its northern extents within the Borough consists of a tightly enclosed valley landscape of open and enclosed floodplain farmland, contained by well-wooded margins and topography, as detailed in the Fareham Landscape Assessment, 2017.

The photos below show the qualities of the Meon Valley floodplain landscape in its upper reaches in Fareham. It is clear that these riverine landscapes which help to shape the Borough are of high sensitivity and have the qualities that would support their inclusion in an 'Area of Special Landscape Quality' as well as providing an important separating element between settlements.

The enclosure and separation of the Meon Valley, to the west of Funtley, is reinforced by the man-made,embanked Deviation Line, which visually and physically separates the two distinctly different character types.



*photo reproduced from Fareham Landscape Assessment, 2017 (LDA Design)*



# Landscape of the Funtley Triangle

In contrast to the Meon Valley, the Funtley Triangle, as confirmed in the Fareham Landscape Assessment, is strongly influenced by the loss of landscape features, with hedgerows being replaced by horse paddock fencing, the presence of stables, sheds, hardstanding and catteries etc. In addition the housing development along Funtley Road and in the west of the area, as well as the railway and M27 corridor have given this landscape an 'urban fringe' character with lower sensitivity to further change. These are not the qualities that would merit inclusion in an 'Area of Special Landscape Quality'.

The Funtley triangle is entirely separate from the Meon Valley to the west of the Deviation Line as illustrated by the bottom photograph.



*Paddock fencing, stables, sheds, hardstanding, housing development, noise, street lighting etc. all contribute to the urban fringe character of the Funtley triangle*



## Supporting evidence

The Landscape and Visual Appraisal (LVA) prepared by Fabrik in 2018 and submitted with Reside's Funtley South planning application (which has a resolution to approve, subject to completion of a S106 agreement) also supports the view that the landscape character sensitivity of the area in the Funtley triangle has been influenced by a number of detractors including adjacent urban development, road and railway noise and its land use for paddocks, resulting in loss of landscape features. The LVA assessed the local landscape character as having low to medium sensitivity for this reason.

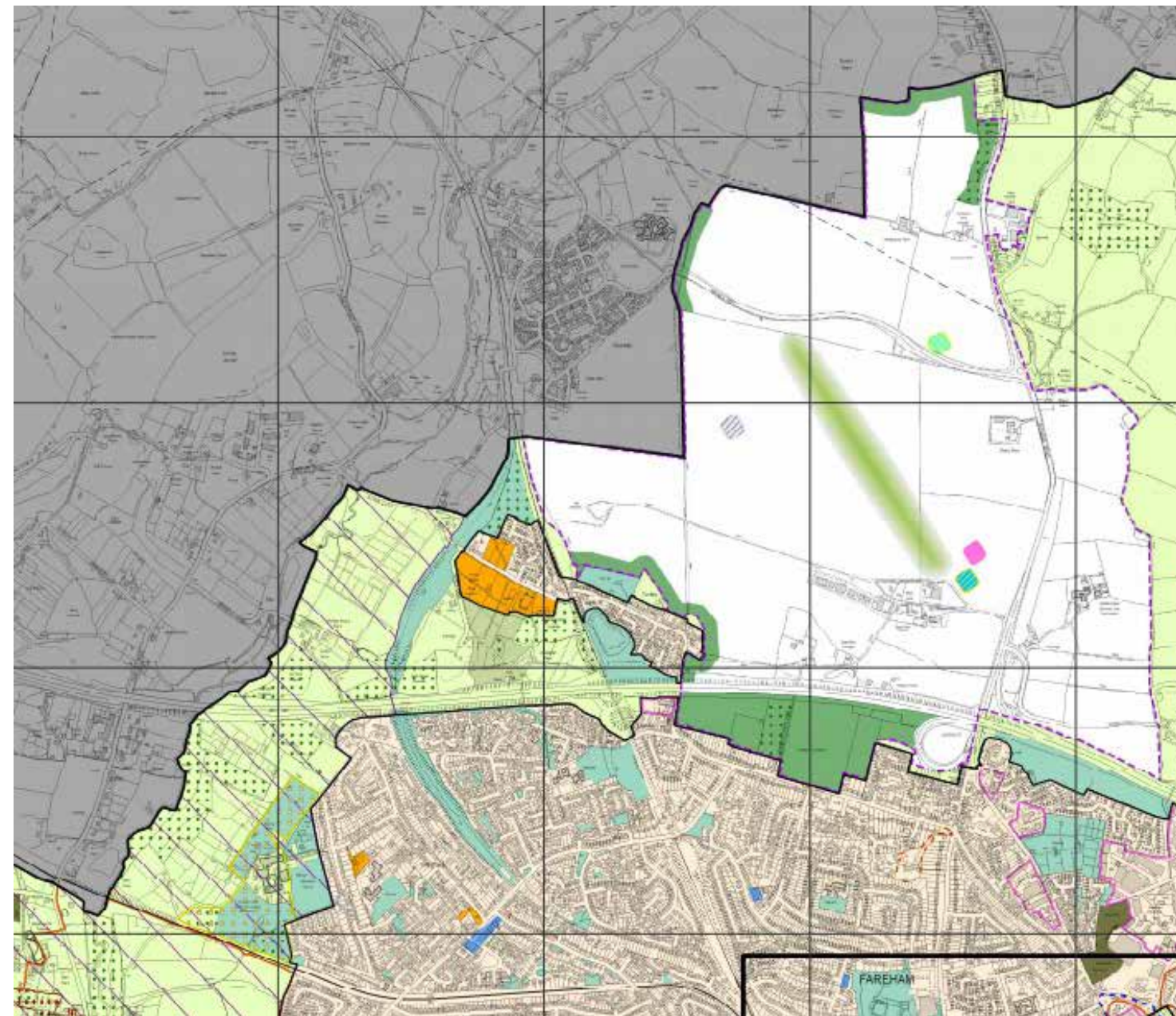
The LVA visual assessment also assessed a range of public viewpoints, both short and long distance, including several within the Meon Valley to the west. The LVA concluded that there is no visual connection between the site and the Meon Valley, due to the Deviation Line and its wooded margins, which provide significant physical and visual screening and separation.

## Conclusion

In defining the Meon Valley ASLQ it is important for unambiguous policy that there is a defensible boundary, based on robust evidence. Hampshire County Council and FBC's more recent detailed assessment of landscape character types shows that the embanked Deviation Line encloses the Meon Valley and marks the landscape character transition from the low lying river valley farmland associated with the course of the Meon river, to the small scale wooded farmland to the east, with its 'urban fringe' influences. In the Funtley triangle, character is particularly compromised by a number of suburban, horticulture and perceptual influences (primarily noise arising from the railway and M27). Visually the embanked railway and the associated woodland, which separates the character types, also forms the edge of the Meon Valley to the west preventing intervisibility and so reinforcing the Meon valley's function as a Strategic Gap. The Deviation Line and associated woodland is covered by an open space designation on the draft policies map protecting its recreational and landscape value.

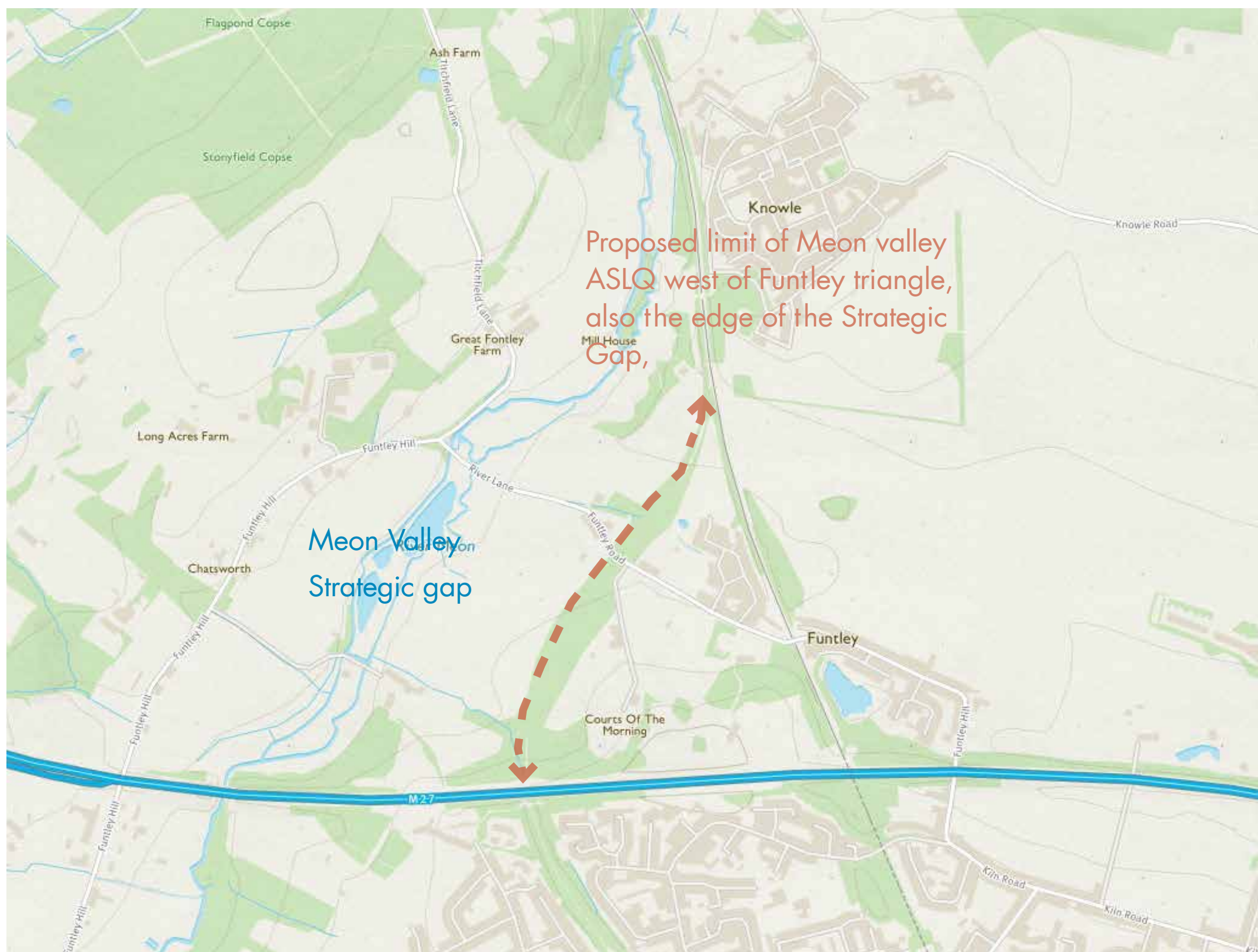
FBC's own evidence base, together with other studies carried out in relation to the Funtley South planning application by Reside's landscape consultants, show that the eastern boundary of the Meon valley ASLQ should be defined by the Deviation Line and that there is no logical reason, based on landscape and visual evidence, that this should be breached and include land within the Funtley triangle.

Therefore we propose that the boundary of the Meon Valley ASLQ should be defined by the Deviation line, as shown on the plan opposite, coinciding with the Strategic Gap, rather extending to an arbitrary location within the Funtley triangle to the east. This is readily defensible with respect to its landscape character and qualities and the visual enclosure that the man-made Deviation line affords to the Meon Valley.




*FBC Local Plan draft policies map in the northern extent of the Borough showing allocations at Funtley North and South and the Deviation Line included as an open space designation. The Meon Valley Strategic Gap lies to the west of the Deviation Line*





The proposed limit of the Meon Valley ASLQ lies at the character transition between character types and open space designation along the disused Deviation Line (now a bridleway), west of the Funtley triangle





## Rummey design

South Park Studios, South Park  
Sevenoaks, Kent, TN13 1AN  
Tel. 00 44 1732 743753

[www.rummey.co.uk](http://www.rummey.co.uk)



## Appendix 4: Illustrative Masterplan (2020)



## Appendix 5: Landscape and Visual Appraisal Addendum (2020)

reside.

Land South of Funtley Road, Funtley

LVA Addendum

r.





Meon Valley

Deviation Line - bridleway & open space

Funtley North

main railway line

proposed Welborne garden village

Funtley South

Funtley

M27

North Fareham



Introduction	5
LVA, 2018	6
Development proposal	8
Landscape and visual implications of development proposal	10
Appendix i Landscape and Visual Appraisal prepared by Fabrik, January 2018	





Funtley triangle is enclosed by substantial treebelts and topography so is visually discrete. The landscape character has been eroded by suburban development and urban fringe uses including horse paddocks and associated structures, lighting and motorway noise....



## Introduction

Funtley South lies within the Funtley triangle north of Fareham and the M27 motorway and is contained by the well-wooded Deviation Line to the west, which separates it physically and visually from the Meon Valley. The main railway contains the eastern edge and separates Funtley North and South from the historic heart of Funtley village and the consented Welborne Garden Village (c.6000 homes) to the north-east of Funtley Village.

In September 2020, Fareham Borough Council granted outline consent for demolition of the existing buildings and construction of 55 dwellings (including 3 custom-build homes) community building incorporating a local shop, access and associated landscaping, infrastructure and development works at the site. The principle of housing on this site has therefore been established.

The application was supported by a Landscape and Visual Appraisal (LVA) prepared by Fabrik Chartered Landscape Architects dated January 2018. The LVA prepared by Fabrik in 2018 and referred to in this Addendum document is found at Appendix i. The comprehensive LVA assessed the potential landscape and visual impacts of the previously approved scheme.

This addendum report analyses where the proposed scheme for up to 125 houses and a Community Park has changed, the landscape-led rationale for the revised scheme, (which is more fully described in the DAS), and then assesses how this has affected the conclusions of the Landscape and Visual Appraisal. This report draws conclusions as to the likely landscape and visual implications associated with the revised development proposals and any mitigation measures that might be required to minimise impacts or optimise the benefits with respect to landscape character and visual amenity.

The existing LVA prepared by Fabrik Ltd (Jan 2018), which was submitted with the consented planning application P/18/0067/OA, sets out the landscape policies relevant to the site and describes the baseline conditions of the site and its surrounding context. The LVA also provides a comprehensive visual study identifying potential visual receptors both within the Funtley triangle and areas beyond this, including public footpaths and roads.

The baseline conditions have not changed from that described in this report except that detailed permission has been granted for housing at Funtley North (23 dwellings) opposite the site and Funtley South has outline consent for up to 55 houses. In addition Welborne Garden Village has also received Resolution to grant by Members for c.6000 dwellings, currently negotiating S106 Agreement.

Representations were made in February 2020, as part of the consultation process on the emerging Local Plan to 2035, concerning the potential inclusion of a small area of the Funtley triangle within the Meon valley Area of Special Landscape Quality (ASLQ). These representations are contained within Rummey Design's Technical Note re proposed Meon Valley ASLQ (Rummey Design Feb 2020) and clearly sets out the reasons why the ASLQ should be defined by the Deviation Line, which lies to the west of Funtley triangle, and exclude any areas within Funtley triangle.

## Landscape character

The landscape character baseline, as outlined within the LVA, recognises the existing urban influences within the Funtley triangle that affect landscape character. The LVA also recognises that the equestrian uses on site have changed and degraded the character of the farmland landscape, concluding that the landscape character sensitivity and value is Low to Medium.

## Visual receptors

The LVA identified and assessed visual amenity and views from a wide range of visual receptors both within the Funtley triangle and across the wider area from publicly accessible locations. The viewpoints clearly illustrate the range of potential views towards the site and show that it is well-contained within the immediate vegetation cover and topography that encloses the triangle. Notably the rising topography to the south encloses the site and prevents any views southwards. The Deviation Line to the west is embanked separating the site from any views from the Meon valley, whilst vegetation along the main railway encloses views to the north and east.

The visual impact assessment informed the development proposals confirming that development should be confined to the lower, less visible slopes, that landscape features should be retained and that the higher, southern parts of the site should be retained to provide public open space.

## Assessment of landscape and visual effects

The assessment concludes that the proposed development would not noticeably alter the landscape character at National, County or Borough level.

At worst it assesses a Moderate-major negative effect on the landscape character at site level, where development is proposed due to the change of use from equestrian fields to residential development. It predicts that there are potential benefits to landscape character in the long term.

With respect to visual effects the assessment predicts that the only negative effects on views are likely to be experienced by residents along Funtley Road/Stage Way/Roebuck Avenue and Honey Lane but that these can be mitigated through planting. It is worth noting that there is only one property that has views into the site on Honey Lane due to a gap in vegetation and that many properties within the residential development areas to the north have vegetation or built form screening views from ground floor windows. These are considered, in best practice guidance, to be to be more important than those from upstairs bedrooms.

No notable effects are predicted on views and visual amenity from public footpaths except for a short section of bridleway on the Deviation Line where there could be glimpsed views into the site in winter. However the appraisal acknowledges that planting on the western edge of the site would mitigate this change.

Overall no widespread landscape and visual effects are predicted and those negative effects that are predicted on the immediate context and at site level are assessed as being able to be effectively mitigated.

The LVA recognises that the development would be well contained within the existing landscape framework and that all important landscape features are retained.

The LVA also concludes that there is an opportunity to secure the long term management of the site, Ancient Woodland and Green Infrastructure as well as providing publicly accessible open space where none exists at present.

The existing LVA does not specifically analyse historic pattern through mapping, which helps to understand the evolution of the landscape and how, by taking this into account, development can more effectively be integrated into the landscape and bring about greater landscape benefits.

Mapping shows the former brickworks and clay pits in the area which, together with the railway, have shaped its character. The 1963 map shows that the Deviation Line has added to the enclosure and isolation of the triangle with the claypits north of Funtley Road becoming the site of an abattoir. Residential areas now occupy this site together with much of the other land north of Funtley Road. The M27 has also had a significant impact cutting an east-west swathe across the landscape, severing the triangle from Fareham North and further isolating it.

Extensive areas of coppice woodland are evident in late Victorian times with a notable field pattern of hedgerows linking the wooded horizons on the upper slopes to the valley bottom. These compartmentalised the landscape and connected landscape features.

The hedgerows have been lost in the latter part of the 20th century and are now only marked by a few isolated trees. The coppice woodland has been lost and fragmented since Victorian times, although the remaining woodland areas and tree groups still give the impression of wooded horizons.

Small paddocks are now defined by a proliferation of post and rail fencing, which, together with hard surfaced areas, stables, large barns and other clutter have eroded the rural character.

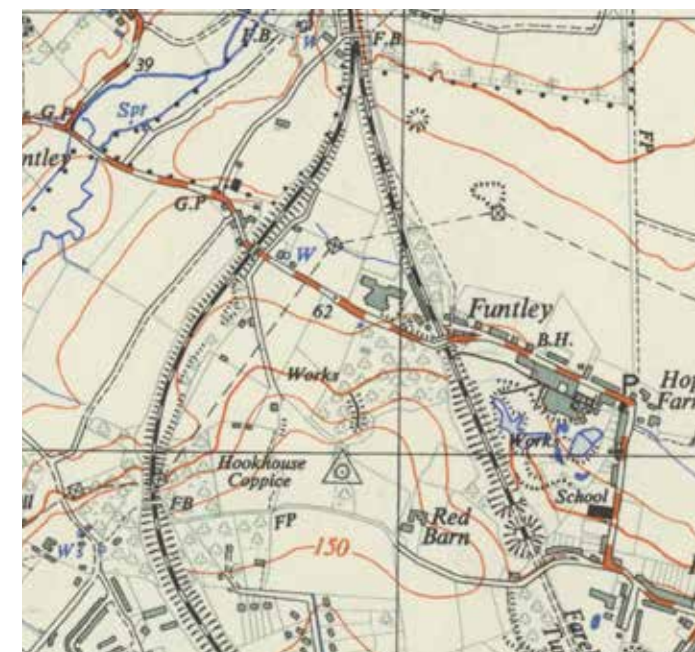
Restoring the historic pattern in green fingers to integrate development and reconnect the valley landscape with the wooded horizons has been one of the key landscape drivers for the revised layout reflected, on the illustrative masterplan by green links and rural edge treatments, which structure the neighbourhoods and provide significant amenity value.



1859 The hamlet of Funtley is next to the railway line with adjacent rectangular field patterns and extensive coppice woodland in the surrounding areas.



1898 coppice woodland is a dominant feature with smaller fields on Funtley South. Brickworks and claypits occupy part of Funtley north



1963 coppice woodland is now fragmented, an abattoir lies north of Funtley Road & the Deviation Line severs the triangle from the Meon valley



2020 the M27 cuts an east-west swathe across the ridge so that Funtley triangle is now isolated on all sides.



# development proposal





The development is to provide for up to 125 dwellings, community building incorporating a local shop with associated infrastructure, new Community Park, landscaping and access as shown on the Illustrative Masterplan opposite.

The site is set within an undulating landscape where the dominant feature is the topography and its wooded horizons which are characteristic. This mature landscape effectively unifies the landscape and helps contain development, where it has occurred. The site itself contributes to the wooded horizons with remnant coppice woodland on the higher ground in the south.

Other significant landscape features on the site include areas of ancient replanted woodland in Great Beamond Coppice, treebelts and mature trees. The proposed development ensures that these key landscape features are retained and enhanced. The smaller scale field pattern that once compartmentalised the site (now only indicated by a few remnant trees) once linked the wooded horizons to the valley floor.

This pattern will be reinstated through the proposed north-south green links which will incorporate the remaining trees and provide access routes, SuDS, biodiversity corridors and new native tree and shrub planting, as well as species-diverse grasslands.

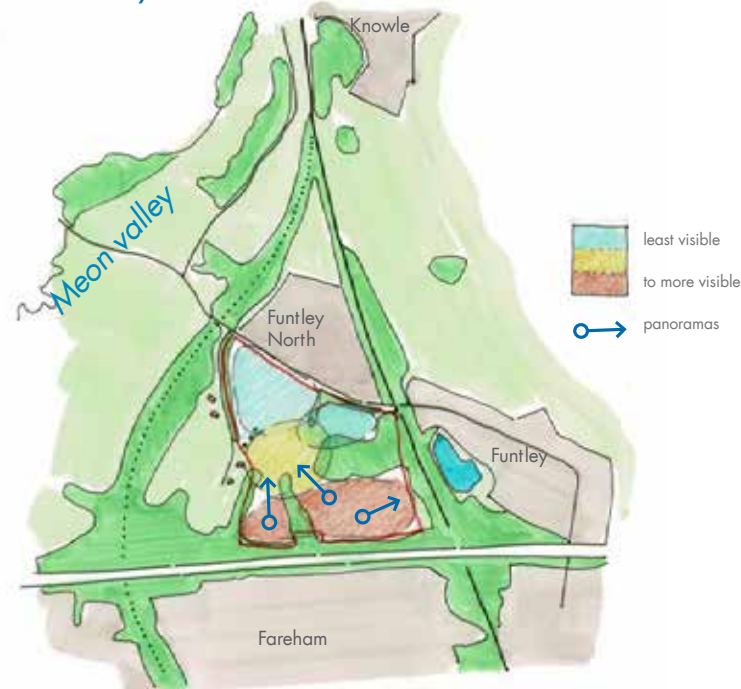
An interconnected network of footpath and cycle routes will link the site to Fareham North to the south and the Meon valley trail and wider countryside to the north, also allowing existing and new communities to access the Community Park located on the higher slopes south of the residential development. This area benefits from panoramic views northwards towards the South Downs and Meon Valley, which will now become accessible to the community.

The Community Park will provide significant areas of open space for informal recreation, with habitats enhanced through management and planting.

The landscape will be managed as part of the development adding to its amenity, biodiversity, recreational, educational and landscape value. Management regimes that might be considered could include traditional methods such as coppicing of woodland and diversification of meadows through green haying or grazing.

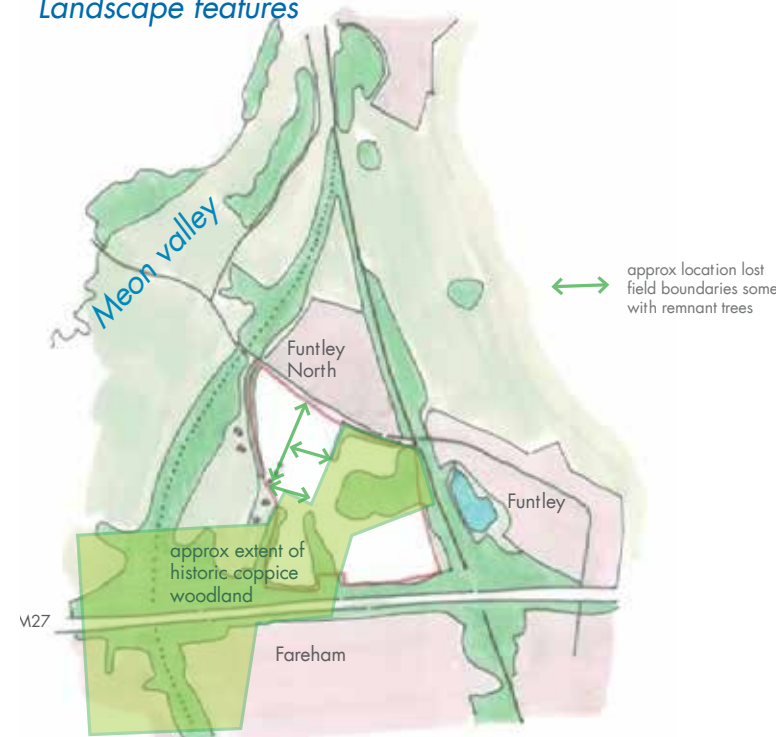
The character of Funtley Road frontage will be designed to reflect the essence of other Meon valley village frontages helping to connect the existing and new communities but also providing a locally distinctive setting within which to integrate development.

## Visibility & Views



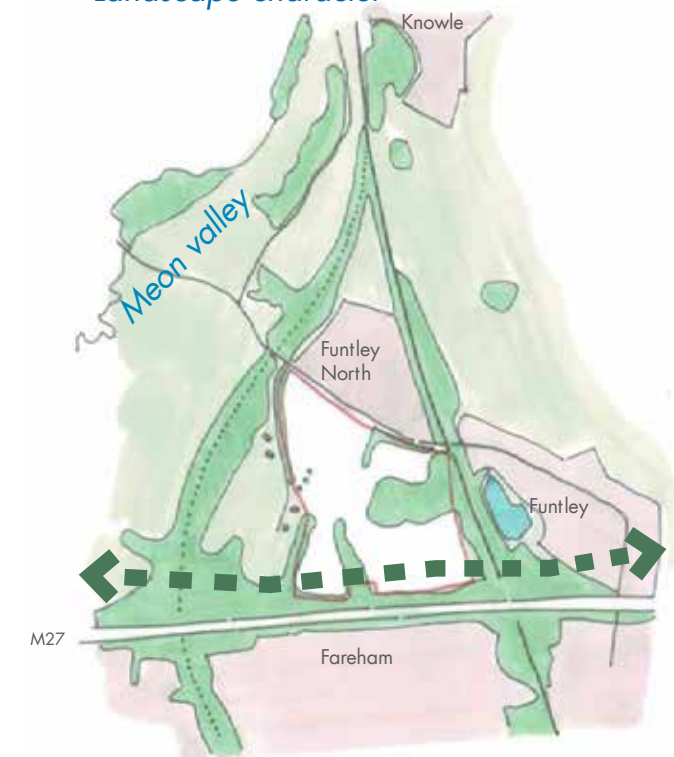
concentrate development in less visible areas on lower slopes, in valley and areas contained by vegetation. Community open space in areas with wider views maintaining and celebrating key panoramas to wooded horizons ...

## Landscape features



historic features such as the north-south hedgerows and interconnected coppice woodland were present into the 20th century but have now been significantly reduced in area or lost. These connected the upper slopes to the valley floor. The repaired landscape structure can bring back some of these features and provide context and sense of place for development, integrating it into its setting ...

## Landscape character



reconnect the site with the wider landscape and Meon valley reinforcing the wooded horizons; soften character transition of built development through density gradients within a repaired landscape pattern ...



# landscape & visual implications of development proposal





# landscape & visual implications of development proposal

The landscape character of Funtley South, which has been affected by adjacent residential development and uses such as a cattery, equestrian activities, stables, vehicle parking, noise from the M27, etc is best described as urban fringe. The urban influences will increase when Welborne Garden village is constructed, to the north-east.

The landscape led approach to the scheme is based on the retention of key landscape features including the replanted Ancient Woodland, the habitats of value within the site and the need to effect landscape restoration to restore the landscape pattern and character which has been eroded. The enhanced landscape will also provide the setting for the proposed development so that it integrates into the site. The enhanced setting will also help mitigate any impacts on visual amenity for local residents that face the site at present from the residential area to the north. Additional benefits are likely to include enhanced recreational opportunities including those provided by the proposed Community Park as well as better connectivity both with Fareham North and the footpath network, including the Meon Trail within the wider countryside.

## Landscape impacts

The potential landscape effects have been assessed at site level, at Borough level LCA and also at County and National character area level. Landscape effects are also assessed on landscape features.

The arboricultural impact assessment confirms that all significant trees are to be retained and protected. The proposal allows for replanting within the greenlinks, reinstating smaller scale landscape compartments for development, based on historic pattern. These also physically and visually connect the wooded slopes and horizons with the valley floor. Additional planting around the rural edge of the site will enhance the existing landscape structure. New and existing vegetation will be managed as part of the development. The effect on landscape features is assessed as beneficial.

The landscape character of the site has been eroded through past uses. The proposed development, although over a slightly increased area compared to the previous proposal, is still located on the lower, less visible slopes and its edges have been carefully defined to relate to the topography and slopes for reasons of visibility and landscape character. The form of development also responds more closely to the landscape pattern, based on studies of its historic evolution.

The effect on landscape character of the proposed development at site level was previously assessed as a Moderate-Major negative effect on the landscape character at site level, where development is proposed due to the change of use from equestrian fields to residential development.

Whilst we would agree that this is a significant change we reiterate that the character of the site and indeed the entire Funtley triangle has been affected by changing uses over a long period with the effect that coppice woodland and field boundaries have been lost and replaced with fencing, sheds, and other buildings. Non-native planting has also been introduced, especially around the existing buildings near the entrance and the general visual amenity that the site provides has declined. In addition there has been little management of the key landscape features such as the woodlands and remaining field trees, which can be expected to decline further without intervention.

The site has been deemed suitable for limited residential development in both published landscape characterisation studies and by the Council, in granting planning permission for 55 houses. A well-designed, landscape-led residential development which respects the character and restores lost features is not necessarily negative, and in this case is positive, particularly in the longer term. Whilst the short term effects on landscape character may be Moderate adverse, the long term effect on landscape character is likely to Minor adverse at worst with the potential to be beneficial. This could stop the century long decline in landscape structure and produce an appropriate and enhanced setting leading to a stronger landscape framework maturing into the 21st and 22nd centuries.

## Visual impacts

We agree with the previous LVA assessment that the site is well enclosed so that the visual effects are likely to be restricted to receptors within the residential areas in Funtley North and road users along Funtley Road.

The proposed development, whilst over a slightly increased area, is still located on the lower, less visible parts of the site and the landscape structure throughout the site is to be enhanced. In addition, rather than cutting the site off from Funtley Road the proposals seek to create a positive, locally distinctive Meon valley village ambience where built form, water and vegetation provide the frontage along Funtley Road. This will enhance the character on both sides of Funtley Road.

Whilst there will be a discernible change in views for residents to the north of Funtley Road, it is assessed that the impacts are likely to be minor to moderate adverse in the short term (mainly related to construction impacts) with the potential for long term benefits as the landscape matures and development is integrated.

Landscape improvements in the Community Park, including the removal of buildings on the upper slopes, new tree planting and enhanced management of both the existing and new vegetation and grasslands are assessed as beneficial to views and visual amenity. This change of use will also give public access so that the panoramic views from the upper parts of the site, which are currently not available to the general public, will be available to all users.

The effects of this renewed landscape structure, combined with the enhanced public footpath access, will produce an enhanced landscape for the public and wildlife alike well into the 21st and even 22nd centuries. This will arrest the continuing decline and fragmentation of the landscape and produce the opportunity for improved landscape management; this new landscape structure will be 're-purposed' as part of the shift from agricultural to residential and leisure landscapes with changing social, economic and environmental circumstances.

Appendix i  
Landscape and Visual Appraisal  
prepared by Fabrik, January 2018

reside.

Land south of Funtley Road, Funtley

Landscape and Visual Appraisal

r.

Project Title: Land South of Funtley Road, Funtley, Hampshire

Client: Reside Developments Ltd

Revision	Date	Revision Details	Prepared By	Checked By	Approved By
DRAFT	19/06/17	Internal review	CLB	SG/AS	SG/AS
00	12/07/17	Internal review	CLB	AS	AS
00	18/07/17	Issued to the client	CLB	AS	AS
01	27/07/17	Revised to suit client's comments and re-issue.	CLB	AS	AS
02	28/07/17	Minor amendments to suit client's comments and re-issue.	CLB	SG	SG
03	16/01/2018	Winter views included and amendments to reflect current scheme proposals - Internal review	LS/DL	AS	AS
04	17/01/2018	Client Review	DL	AS	AS
05	19/01/2018	Client / planner comments integrated	DL	AS	AS

Contents

<b>1. Introduction</b>	4	<b>6. Appraisal of Landscape and Visual Effects</b>	75
1.1 Introduction	4	6.1 Effects on Heritage Assets	75
1.3 Desktop Research and Study Area	4	6.2 Effects on Topography	75
1.4 Field Work	4	6.3 Effects on Land Use	75
<b>2. Baseline Conditions</b>	6	6.6 Effects on Landscape Character	77
2.1 Landscape and Heritage Designation	6	6.7 Effects on Visual Receptors	78
2.2 National Landscape Policy	6	<b>7. Policy Compliance</b>	80
2.3 Local Landscape Policy	10	<b>8. Summary and Conclusions</b>	82
2.4 Introduction	16	8.1 Summary of the baseline conditions	82
2.5 Topographic Context	16	8.2 Summary of the landscape effects	82
2.6 Contextual Landscape Elements	18	8.3 Summary of the visual effects	83
2.7 Contextual Public Rights of Way	20	8.3 Conclusions	83
2.8 Contextual Movement Corridors	22	<b>8. Summary and Conclusions</b>	83
2.9 Landscape Character Context	24	<b>Appendix 1 – fabrik LVA Methodology</b>	84
2.10 Existing Landscape Conditions at Site Level	35		
2.11 Internal Visual Survey	38		
<b>3. Visual Baseline Conditions and Sensitivities</b>	49		
3.1 Introduction	49		
3.2 Visual Appraisal	49		
3.3 Visual Appraisal from the Local Area	52		
3.4 Visual Appraisal from the Wider Study Area	62		
<b>4. Landscape Constraints and Opportunities</b>	71		
4.1 Introduction	71		
4.2 Constraints	71		
4.3 Opportunities	71		
<b>5. Illustrative Proposed Development Parameters</b>	73		
5.1 Landscape Development Parameters	73		

## 1. Introduction

### 1.1 Introduction

fabrik Chartered Landscape Architects have been appointed by Reside Developments Ltd to carry out a Landscape and Visual Appraisal (LVA) of the land to the south of Funtley Road, Funtley, Hampshire (the Application Site, refer to **Figure 1.1**) and its environs, in order to consider the likely physical and visual impacts arising as a result of the proposed development.

This LVA forms one of the suite of documents provided with the outline application. it sets out landscape policy and then goes on to describe the existing topography, land cover, vegetation, landscape features, landscape character and visual receptors of the local area in order to assess the landscape and visual effects of the proposed development which together inform the landscape character. The LVA also describes the baseline character and amenity of the identified visual receptors (considering the visual envelope, the different groups of people, places affected, the nature of the view and the visual amenity). This document describes the development proposals and then sets out a statement of landscape and visual effects.

This LVA should be read in conjunction with the suite of documents submitted with the outline application (all matters reserved except for access).

The methodology for the LVA is based on the 'Guidelines for Landscape and Visual Impact Assessment' (third edition) by the Landscape Institute and Institute of Environmental Management and Assessment (Routledge, 2013) and is set out at Appendix 1.

Where the terms 'Site' and 'Application Site' are used in this LVIA, these both refer to the land defined by the red line boundary shown in Figure 1.1; which is the subject of two separate planning applications:

#### 1) Outline Application

Following demolition of existing buildings residential development of up to 55 dwellings (including 3 self-build homes) (Use Class C3), community building incorporating a local shop 250 sqm (Use Classes A1, A3, D1 & D2), accesses and associated landscaping, infrastructure and development works.

#### 2) Change of Use

Change of use of land from equestrian/grazing to community park following demolition of existing buildings

### 1.2 Overview of Proposed Development

The proposed development comprises of 55 dwellings, a community building incorporating a local shop, with associated infrastructure, new community park, landscape planting and access. The Site area is 16.18 hectares (ha) and the Site is a proposed development allocation (ref. HA10) in the emerging Fareham Local Plan 2036.

### 1.3 Desktop Research and Study Area

The desktop survey carried out as part of the LVA included the review of previous proposals, Ordnance Survey maps, interactive maps, aerial photography, published landscape character assessment documents and planning policy. This was further verified through field work, to determine the potential zone of landscape and visual influence of the site and proposed development, including views requested by the Principal Planner of Fareham Borough Council on 25/05/2017.

The study area was found to generally extend to around 2.0km from the centre of the Site. Beyond this the landscape is visually divorced from the area by the intervening topography, vegetation and in places, built form. The LVA nevertheless considers the wider landscape, planning and designations context to the land within the Site.

### 1.4 Field Work

The field work was initially carried out on 07/06/17 and recorded the existing landscape elements within the Site; the contextual landscape elements; and identified a series of key visual receptors. The visual assessment element includes a photographic survey of the land within the Site taken from a series of representative key views, chosen to represent a range of public views, distances and directions within the study area. The photographic survey was updated to reflect winter views on 05/01/2018.

Viewpoints 15-19 were omitted from the winter photographic survey, since the summer views demonstrated such an extent of screening of the views (by vegetation and/or landform in the intervening areas), that it was considered that no significant visual change would occur in winter.

However, additional winter views were taken from the bridleway following the disused railway line west of the Site, since the lack of leaf cover in winter revealed glimpsed views to parts of the Site and nearby existing dwellings. Summer viewpoint 4 is represented by a viewpoint taken from within the Site, but standing very close to the low hedge at the boundary with the adjacent property (containing a dwelling at the southern end of Honey Lane.

While the summer and winter views show slight differences in the position of the viewpoint and focal lengths of camera lens used, there are otherwise, no material differences in the view.



1. Introduction

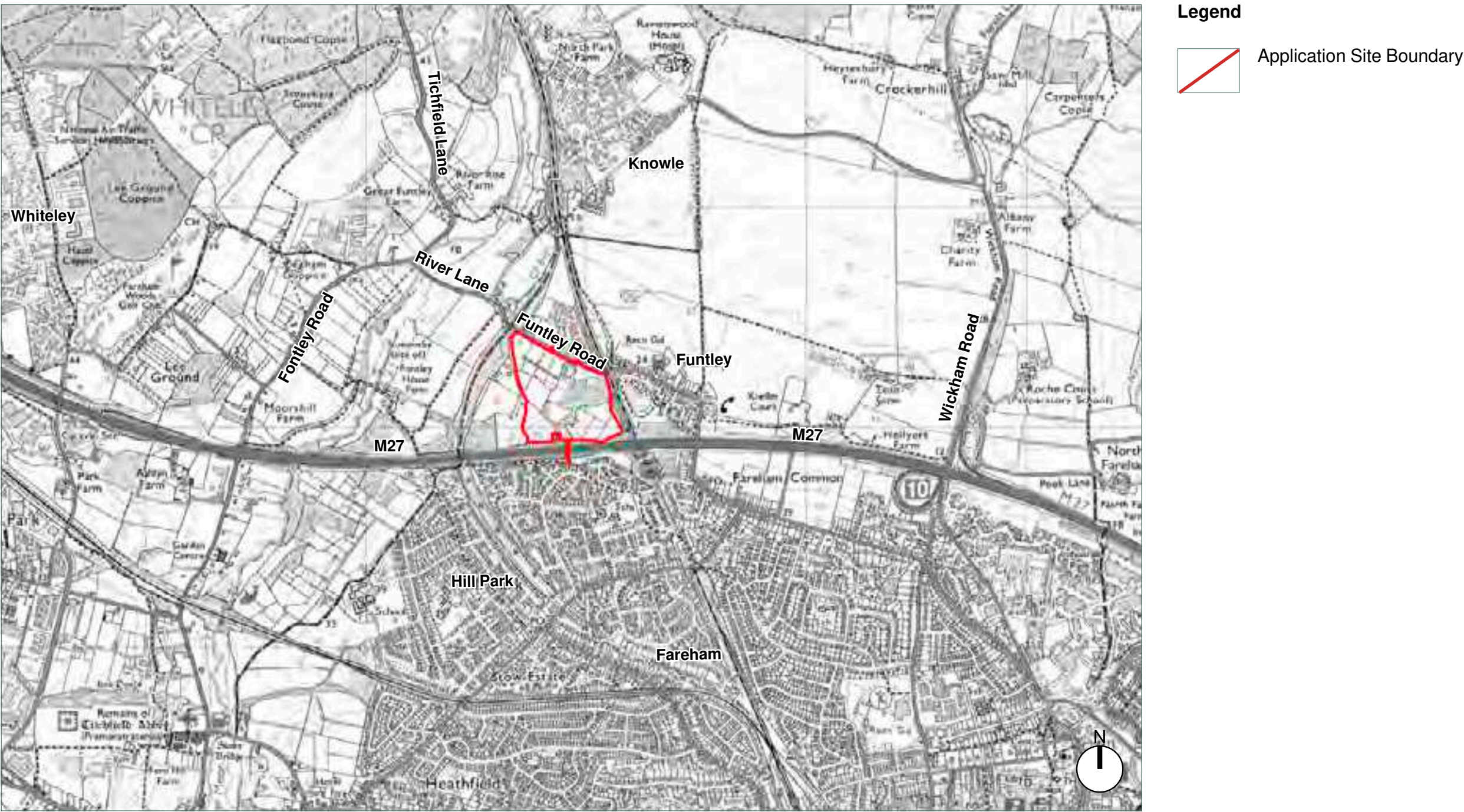


Figure 1.1 – Extract from Ordnance Survey Plan showing the Application Site location and boundary (fabrik, 2018)



## 2. Baseline Conditions

### 2.1 Landscape and Heritage Designation

The land within the Site lies wholly within the jurisdiction of Fareham Borough Council and is located within the landscape designation of Area Outside of Defined Urban Settlement Boundary. The area within the north-western part of the Site is designated as Existing Open Space in the Fareham Core Strategy (Adopted August 2011).

Within the Study Area, there are a number of Listed Buildings, Scheduled Ancient Monuments, Ancient Woodlands and Historic Parks and Gardens. The Scheduled Ancient Monument of Tichfield Abbey and Fishponds with a group of Grade II Listed Building of Abbey Cottage, Fisherman's Arms, Place House Cottage and Garden are situated along Mill Lane to the south west of the Application Site. There are no Listed Buildings which abut the Application Site or which have intervisibility with the Application Site.

The South Downs National Park (SDNP) is at located approximately 3.7km to north east of the Application Site (and therefore outside of the 3km radius of the study area). This was further verified through field survey work to determine that views of the Application Site are truncated from the SDNP due to intervening topography, built form and vegetation (refer to the visual baseline on Pages 45 and 47).

The Grade II Listed buildings of Church of St Francis is located approximately 510m along Funtley Road to the east of the Application Site. A Scheduled Ancient Monument (the Site of Funtley Iron Works) together with a group of Grade II Listed buildings (including Ironmaster's House and Funtley House) are situated approximately 500m to the south west of Application Site along Ironmill Lane.

The Application Site contains Great Beamond Coppice, an Ancient Re-planted Woodland. This woodland, together with the tree blocks within central northern and south-western sections of the Application Site, are designated as a Site of Importance of Nature Conservation (SINC) and are also covered by a Tree preservation Order (TPO). Another Ancient Woodland of Hookhouse Coppice is also located approximately 200m to the south west of Application Site.

There are no other landscape or heritage designations within nor adjacent to the Application Site.

The above designations are shown on **Figures 2.1 and 2.2** on the following pages.

Land to the east of Funtley is designated for a new settlement known as Welborne. Settlement buffers are proposed in key locations, including along the eastern edge of Funtley.

### 2.2 National Landscape Policy

The National Planning Policy Framework (NPPF) (March 2012) seeks the presumption in favour of sustainable development. The following issues and policies are pertinent to this LVA.

Section 7 sets out the requirements of good design. Paragraph 56 states that: *"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people."*

Paragraph 57 goes on to state that: *"It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces..."*

Paragraph 58 looks to ensure that developments:

- *"will function well and add to the overall quality of the area, not just for the short term, but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*

- *create safe and accessible environments...; and*
- *are visually attractive as a result of good architecture and appropriate landscaping."*

Furthermore, Paragraph 65 states that: *"Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)."*

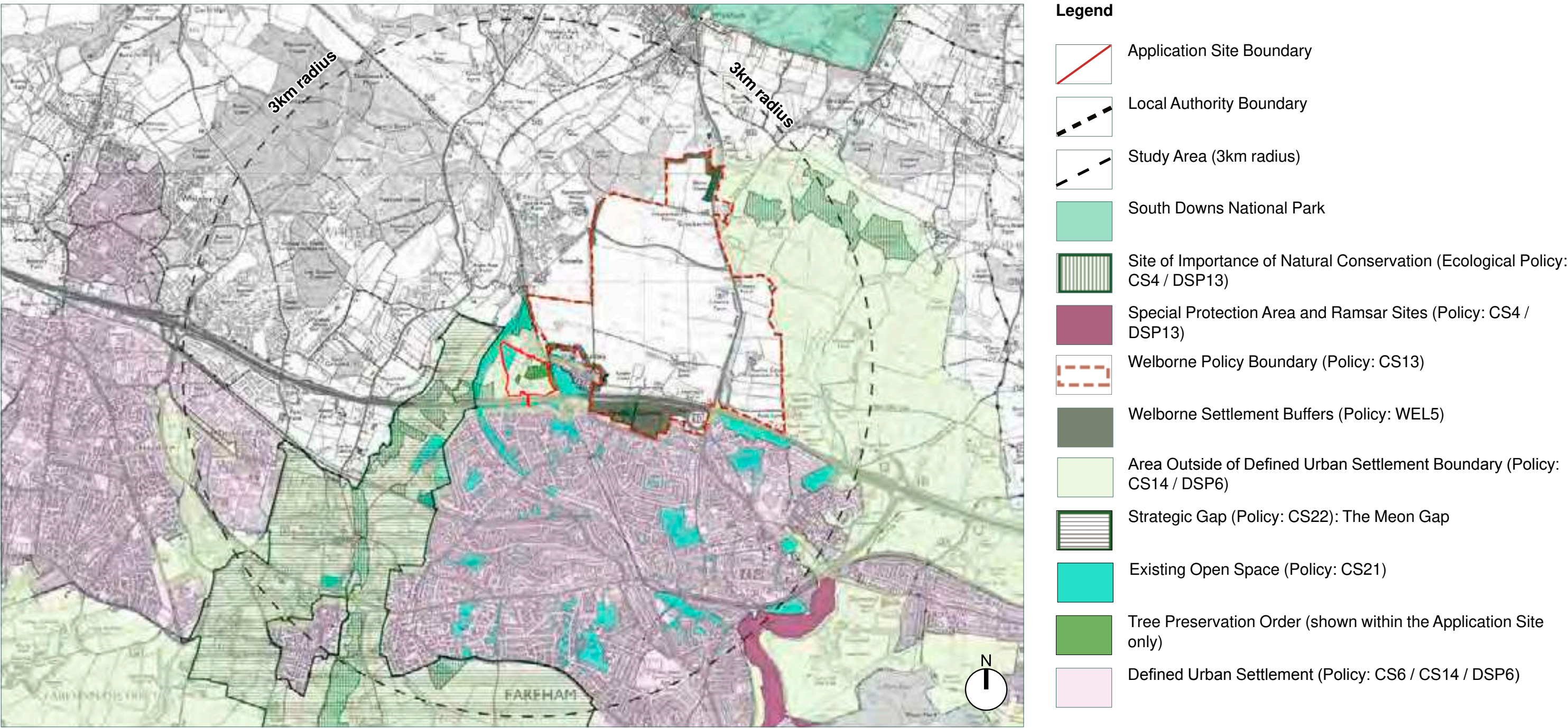
Section 8 of the NPPF deals with 'Promoting healthy communities' and seeks to achieve:

- *"Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mix-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;*
- *Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas."*

Section 10 deals with climate change. Paragraph 96 sets out that development should take into account the landform, layout, building orientation, massing and landscaping to minimise energy consumption. Furthermore, Paragraph 99 states that: *"... When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure."*



2. Baseline Conditions



**Figure 2.1 – Plan** illustrating landscape and ecological designations as shown on the Fareham Borough Council 2015 Adopted Local Plan Proposals Map (fabrik, 2018)



2. Baseline Conditions

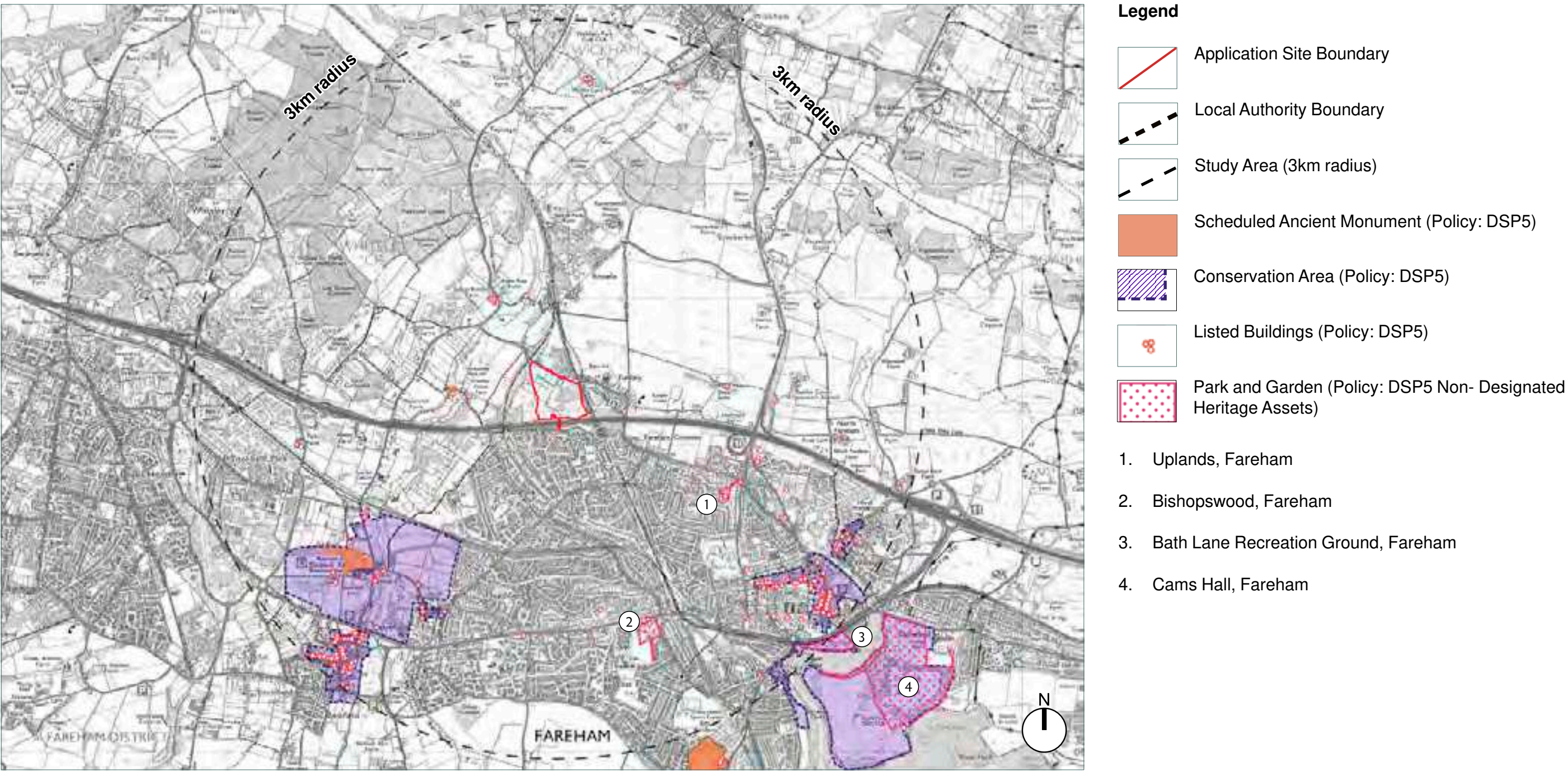


Figure 2.2 – Plan illustrating heritage assets within the 3km study area (fabrik, 2018)



2. Baseline Conditions

2.2 National Landscape Policy (continued)

Conserving and enhancing the natural environment is the topic of Section 11. Paragraph 109 states that: *“The planning system should contribute to and enhance the natural and local environment by:*

- protecting and enhancing valued landscapes, geological conservation interests and soils;*
- recognising the wider benefits of ecosystem services;*
- minimising impacts on biodiversity and providing net gains in biodiversity.”*

Paragraph 115 goes on to state that: *“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”*

The Application Site does not lie within or form part of the setting to a valued landscape.

National Planning Practice Guidance - NPPG (March 14)

The NPPF is now supported by the on-line resource Planning Policy Guidance (PPG). There are a number of sections that relate to this LVA as set out below.

The PPG sets out guidance on Design at section ID 26 (updated on 6 March 2014) and the elements to be considered to achieve good design. Paragraph 001 under this section states that: *“The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design.*

*Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.*

*Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use - over the long as well as the short term.”*

Paragraph 002 states that: *“Good design should:*

- ensure that development can deliver a wide range of planning objectives*
- enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being address the need for different uses sympathetically.”*

Paragraph 004 goes on to state that: *“Development proposals should reflect the requirement for good design set out in national and local policy. Local planning authorities will assess the design quality of planning proposals against their Local Plan policies, national policies and other material considerations.”*

Paragraph 007 states that planning should promote local character (including landscape setting) - states:

*“Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.*

*The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.*

*When thinking about new development the site’s land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process.*

Paragraph 009 relative to greenspaces and public places - includes the following:

*“Development should promote public spaces and routes that are attractive, accessible, safe, uncluttered and work effectively for all users – including families, disabled people and elderly people. A system of open and green spaces that respect natural features and are easily accessible can be a valuable local resource and helps create successful places. A high quality landscape, including trees and semi-natural habitats where appropriate, makes an important contribution to the quality of an area.”*

Landscape is a sub section under Section ID 8 on the Natural Environment (updated on 6 March 2014). Paragraph 001 on landscape character states that: *“One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes, but also the wider countryside.*

*Where appropriate, landscape character assessments should be prepared to complement Natural England’s National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making.”*

Under the biodiversity, ecosystems and green infrastructure section, paragraph 015 on green infrastructure defined this as: *“... a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure includes parks, open spaces, playing fields, woodlands, street trees, allotments and private gardens.”*

## 2. Baseline Conditions

### 2.3 Local Landscape Policy

#### Introduction

The Fareham Borough Council is undergoing the process of producing a new Local Plan to reflect new housing and employment needs within the borough up to 2036. Before the emerging local plan is adopted by the Council, the policies within the Fareham Local Development Framework, Core Strategy (Adopted August 2011) form the principal documents within the Local Plan.

#### Current Policy: Fareham Local Development Framework, Core Strategy (Adopted August 2011)

Within the Adopted Core Strategy, the Council has set out strategic objectives to reflect the national policies, as well as to monitor and deliver a sustainable community within the borough.

The following objectives are pertinent to this LVA.

Strategic Objective SO1 aims to: *“To deliver the South Hampshire Strategy in a sustainable way, focussing development in Fareham, the Strategic Development Area north of Fareham and the Western Wards.”*

Strategic Objective SO8 aims to: *“To deliver a new sustainable settlement to the north of Fareham, creating 6,500-7,500 homes, up to 90,750 sq.m employment floorspace, a new district centre and other supporting retail and community provision.”* This relates to the Welborne settlement proposed to the east of Funtley.

SO10 states that the Local Authority wishes to: *“...manage, maintain and improve the built and natural environment to deliver quality places, through high quality design sustainability and maintenance standards, taking into account the character and setting of existing settlements and neighbourhoods and seeking safe environments which help to reduce crime and the fear of crime.”*

Whilst SO11 is concerned with green infrastructure, aiming to: *“...protect and enhance access to green infrastructure, the countryside,*

*coast and historic environment whilst protecting sensitive habitats or historic features from recreational pressure, and protect the separate identity of settlements, including through the designation of strategic gaps.”*

In terms of development proposals and designations, the following policies are pertinent to this LVA.

Policy CS4 relates to the green infrastructure within the borough and states: *“Habitats important to the biodiversity of the Borough, including Sites of Special Scientific Interest, Sites of Importance for Nature Conservation, areas of woodland, the coast and trees will be protected ...”* The policy goes on and states: *“Development Proposals will be permitted where Green Infrastructure provision in accordance with the Green Infrastructure Strategy has been integrated within the development where this is appropriate. Development proposals will provide for appropriate access to green space for informal recreation to avoid adverse impacts from recreation and other impacts on European 31 and Ramsar sites and on nationally and locally important sites.”*

Within the Core Strategy and the proposal map, the Welborne Policy Boundary is within the close distance to the Application Site to the north-east (refer to Figure 2.1). This future development allocates up to 6,000 dwellings with associated transportation links, green infrastructure and open spaces. The relates Policy is CS13 North of Fareham Strategic Development Area and states that: *“Permission will be granted for the development of a Strategic Development Area to the north of Fareham following the adoption of an Area Action Plan and the preparation of a comprehensive masterplan for the development. The development will include provision for between 6,500- 7,500 dwellings, unless it is found that this level of housing cannot be delivered without adversely affecting the integrity of protected European conservation sites. If any potential adverse effects cannot be avoided or adequately mitigated, the level and scale of development would need to be reduced accordingly to ensure that there are no adverse effects on the integrity of any European sites. The development will also provide supporting environmental, social and physical infrastructure, retail and employment floorspace to both support the development and to contribute towards meeting*

*the development objectives of the South Hampshire Sub-Region. The new community will aim to be as self-contained as possible, whilst complementing and supporting the established town centre of Fareham and adjoining settlements.”*

Policy CS14 refers to Development outside the defined settlement boundary, stating: *“Built development on land outside the defined settlements will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function.”*

Policy CS17 is concerned with High Quality Design, with focus on landscape and stating: *“All development, buildings and spaces will be of a high quality of design and be safe and easily accessed by all members of the community. Proposals will need to demonstrate adherence to the principles of urban design and sustainability to help create quality places. In particular development will be designed to:*

- *respond positively to and be respectful of the key characteristics of the area, including heritage assets, landscape, scale, form, spaciousness and use of external materials;*
- *provide continuity of built form, a sense of enclosure with active frontages to the street and safety of the public realm;*
- *provide green infrastructure, including landscaping, open spaces, greenways and trees within the public realm...”*

The policy relating to the Protection and Provision of Open Spaces, CS21 states: *“The Borough Council will safeguard and enhance existing open spaces and establish networks of Green Infrastructure to add value to their wildlife and recreational functions. Development which would result in the loss of or reduce the recreational value of open space, including public and private playing fields, allotments and informal open space will not be permitted, unless it is of poor quality, under-used, or has low potential for open space and a better quality replacement site is provided which is equivalent in terms of accessibility and size.”*

Policy CS22 deals with developments within Strategic Gaps and states: *“Land within a Strategic Gap will be treated as countryside. Development proposals will not be permitted either individually or*



2. Baseline Conditions

2.3 Local Landscape Policy (continued)

*cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of settlements.*

*Strategic Gaps have been identified between Fareham/Stubbington and Western Wards/Whiteley (the Meon gap)...*

**Fareham Borough Local Plan Part 2: Development Sites and Policies (Adopted June 2015)**

The Local Plan Part 2 reinforces the Core Strategy’s policies relating to the natural environment. Paragraph 4.1 summarises: *“The Natural Environment is a key asset of the Borough, which provides a significant contribution to the quality of life of residents and visitors. It not only provides a natural, green setting for the Borough’s settlement, but is also important for recreation and leisure uses as well as supporting the Borough’s biodiversity including internationally important habitats for wildlife. The Plan is important in establishing the right balance between planning for growth and protecting the natural environment.”*

Policy DSP40 Housing Allocations includes the following, which is of relevance to the proposed development site:

*“Where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements of the Core Strategy (excluding Welborne) additional housing sites, outside the urban area boundary, may be permitted where they meet all of the following criteria:*

- i. The proposal is relative in scale to the demonstrated 5 year housing and supply shortfall;*
- 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;*
- 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;*

*iv. It can be demonstrated that the proposal is deliverable in the short term; and*

*v. The proposal would not have any unacceptable environmental, amenity or traffic implications.”*

Policy DSP2 concerns with any environmental impact of new developments to the existing development and wider landscape, and go on stating: *“Development proposals should not, individually, or cumulatively, have a significant adverse impact, either on neighbouring development, adjoining land, or the wider environment, by reason of noise, heat, liquids, vibration, light or air pollution (including dust, smoke, fumes or odour)....”*

Policy DSP5 relates to any developments affecting the setting of historical assets and states: *“Designated and non-designated heritage assets are an irreplaceable resource that will be conserved in a manner appropriate to their significance, to be enjoyed for their contribution to the quality of life of this and future generations. The wider social, cultural, economic and environmental benefits of their conservation will also be taken into account in decision making....”*The policy goes on and state: *“....The Council will conserve Scheduled Monuments, and archaeological sites that are demonstrably of national significance, by supporting proposals that sustain and where appropriate enhance their heritage significance. Proposals that unacceptably harm their heritage significance, including their setting, will not be permitted.*

*Non-designated heritage assets including locally listed buildings, historic parks and gardens, and sites of archaeological importance will be protected from development that would unacceptably harm their Architectural and historic interest, and/or setting taking account of their significance.*

Policy DSP6 relates to the Core Strategy CS14 on Development Outside of the Defined Urban Settlement Boundaries and states: *“There will be a presumption against new residential development outside of the defined urban settlement boundaries (as identified on the Policies Map).....A change of use of land outside of the defined urban settlement boundary to residential garden will only be permitted where:*

*i. It is in keeping with the character, scale and appearance of the surrounding area; and*

*ii. It will not detract from the existing landscape; and*

*iii. It respects views into and out of the site.”*

Policy DSP13 relates to the impact of new development on the nature conservation areas within the borough and states: *“Development may be permitted where it can be demonstrated that;*

- i. designated sites and sites of nature conservation value are protected and where appropriate enhanced;*
- ii. protected and priority species populations and their associated habitats, breeding areas, foraging areas are protected and, where appropriate, enhanced;*
- iii. where appropriate, opportunities to provide a net gain in biodiversity have been explored and biodiversity enhancements incorporated; and*
- iv. The proposal would not prejudice or result in the fragmentation of the biodiversity network.*

*Proposals resulting in detrimental impacts to the above shall only be granted where the planning authority is satisfied that (this section of the policy should not be applied to impacts on SPA designated sites which are subject to stricter protection tests as set out in The Conservation of Species and Habitats Regulations (as amended) 2010);*

- i. Impacts are outweighed by the need for, and benefits of, the development; and*
- ii. Adverse impacts can be minimised and provision is made for mitigation and, where necessary, compensation for those impacts is provided.*

*Enhancements that contribute to local habitat restoration and creation initiatives as set out in the Hampshire Biodiversity Action Plan (or other similar relevant document ) will be supported.”*

## 2. Baseline Conditions

### Supplementary Planning Documents

#### Planning Obligations Supplementary Planning Document for the Borough of Fareham (Excluding Welborne) Adopted April 2016

In terms of public open space, outdoor sport and children's play equipment, Appendix B sets out that for developments of between 50-299 dwellings, 1.5ha per 1000 population is to be provided for parks and amenity open space. No sport provision is required for this scale of development. In terms of play provision, for developments between 50-199 dwellings, a LEAP is required.

#### Emerging Policy: Fareham Local Plan 2036 (Draft, Consultation Version)

**Figure 2.3** on the following page illustrates the proposed amendments to the policies map. **Figure 2.4** shows the development allocation plan from Appendix G of the emerging local plan. The Application Site is proposed for residential development and new open space. Land to the north is also proposed as a residential allocation. Extracts of the policies relative to landscape matters are set out below:

Policy HA10 sets out the requirements of the proposed allocation, with a capacity for 55 dwellings and states that: "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 quantum of housing proposed shall be broadly consistent with the indicative site capacity; and
- b) Primary highway access shall be from Funtley Road; and
- c) Building heights are limited to a maximum of 2 storeys; and
- d) Safe pedestrian and cycle crossing points across Funtley Road and connectivity with the existing footpath/bridleway network in the vicinity of the site and eastwards towards the centre of Funtley village in order to maximise connectivity to nearby facilities and services; and

- e) The creation of a vehicular loop road on the site, allowing for pedestrians and cycle permeability across the site; and
- f) Proposals shall take account of the site's landscape context by incorporating view corridors from Funtley Road through to the public open space allocation to the south of the residential allocation (as illustratively shown in Appendix G). The view corridors should form part of the on-site open space and should incorporate pedestrian and cycle links, whilst vehicular crossing links should be limited; and
- g) A 15m buffer shall be incorporated between development and the Great Beamond Coppice SINC to the east of the site; and
- i) The provision of a building / buildings for community uses, located in an accessible location to enable a range of uses for both existing and new residents; and
- j) Proposals shall either provide directly, or provide financial contribution towards the delivery (and maintenance where deemed necessary) of the following infrastructure, in line with the Council's Planning Obligations SPD:
  - Public open space on and off-site (as illustratively shown in Appendix G) (in line with the Council's Planning Obligations SPD); and
  - a Local Area of Play (LEAP) on-site (in line with the Council's Planning Obligations SPD).

In light of the landscape setting, this development allocation is required to take a looser, less dense approach, applying a density of around 20 dwellings per hectare (dph). In light of the rural setting, significant natural landscaping should be incorporated, so that proposals are assimilated into the landscape. Part of this assimilation includes the incorporation of view corridors, between Funtley Road and the open space south of the site, which are required to maintain visual and physical connections through the site.

Additionally, the delivery of the community uses building and public open space are critical elements in making the development

acceptable, by providing additional assets for both the existing and new community. The community building envisaged is one that is multi-functional and flexible to allow for a range of small-scale community uses, whilst the proposed public open space should be more informal in nature, to take account of and strengthen the landscape setting.

Appendix F is a visual demonstration of the suggested approach to development in this location, taking account of the approach detailed above."

The other pertinent policies of the Local Plan, relative to landscape and visual matters are:

Policy CF6: Provision and Protection of Open Space, which states that: "Proposals for new residential development will be required to provide open space to meet the needs of new residents in accordance with the thresholds and requirements set out in the Council's Planning Obligations SPD.

Proposals seeking to develop on open space will not be permitted unless it can be clearly demonstrated that:

- a) The open space is surplus to local requirements and will not be needed in the long-term following a robust assessment; and
- b) Replacement provision will be at least equivalent or better in terms of quantity, quality and accessibility and there will be no overall negative impact on the provision of open space; or
- c) The development is for alternative recreational provision, which meets locally identified needs and clearly outweighs the loss of the original open space; or
- d) The loss of open space is replaced by a scheme which delivers high quality community, educational or health benefits and clearly outweighs the scale of the net loss of open space."

2. Baseline Conditions

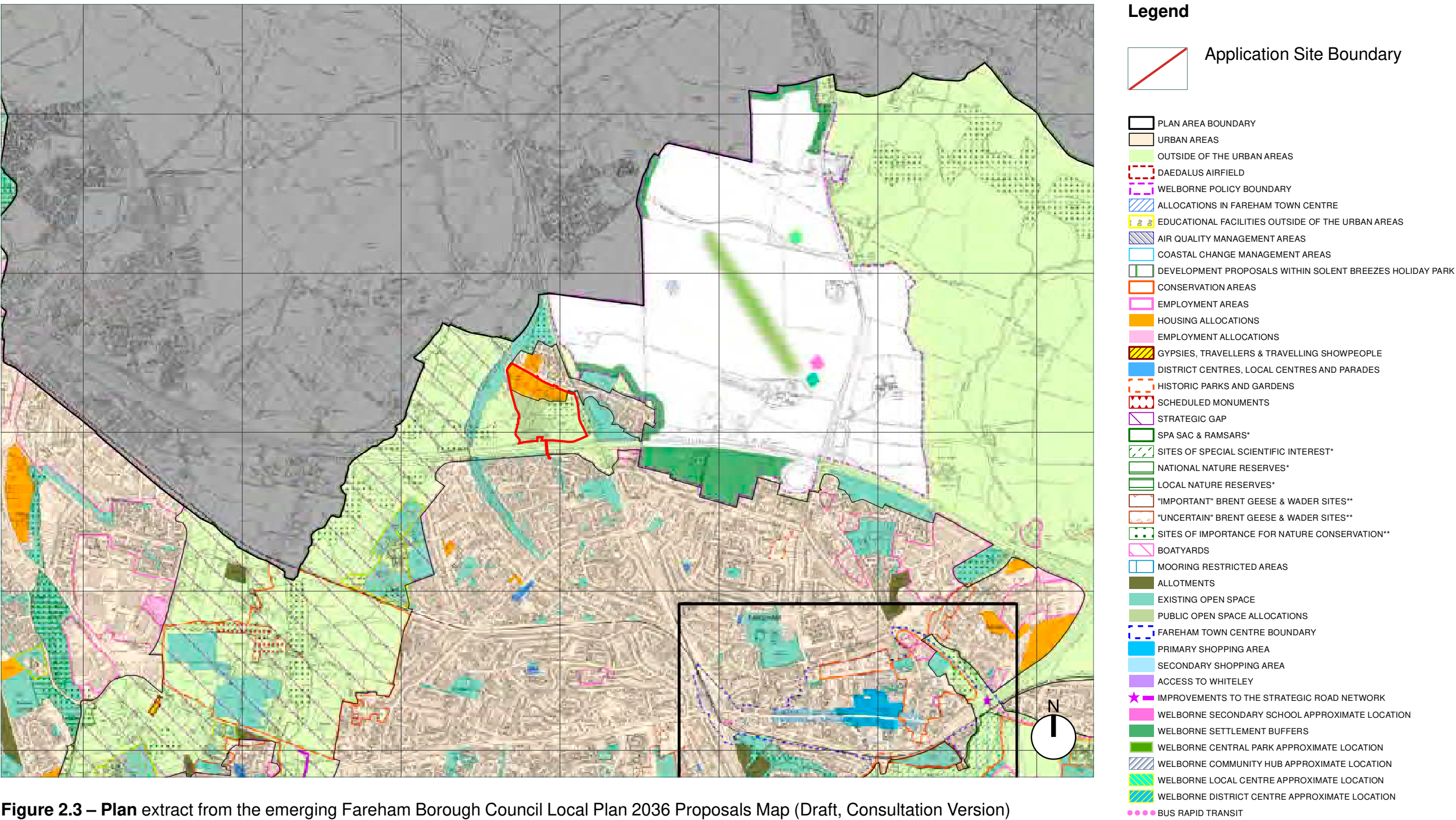


Figure 2.3 – Plan extract from the emerging Fareham Borough Council Local Plan 2036 Proposals Map (Draft, Consultation Version)



2. Baseline Conditions

**Emerging Policy: Fareham Local Plan 2036 (Draft, Consultation Version) Continued**

Policy NE1 deals with Landscape and states that: *“Development for all major applications will be permitted only where it can be demonstrated, through a robust landscape assessment that the proposals satisfy the specific development criteria contained within the Council’s Landscape Sensitivity Assessment for the character area in which the development is located.*

*Development proposals must respect, enhance and not have severe adverse impacts on the character or function of the landscape that may be affected, with particular regard to:*

- a) Intrinsic landscape character, quality and important features;*
- b) Visual setting, including to/from key views;*
- c) The landscape as a setting for settlements, including important views to, across, within and out of settlements;*
- d) The landscape’s role as part of the existing Green Infrastructure network;*
- e) The local character and setting of buildings and settlements;*
- f) Natural landscape features, such as trees, ancient woodland, hedgerows, water features and their function as ecological networks; and*
- g) The character of the Borough’s rivers and coastline, which should be safeguarded.*

*Major development proposals shall include a comprehensive landscaping mitigation and enhancement scheme to ensure that the development is able to successfully integrate with the landscape and surroundings. The landscaping scheme shall be proportionate to the scale and nature of the development proposed and shall be in accordance with the enhancement opportunities specified in the*

*Council’s Landscape Sensitivity Assessment.”*

Policy D1 is the topic for High Quality Design, setting out that all development proposals and spaces are to be of high quality, based on principles of urban design and sustainability to help create quality places. It includes the following:

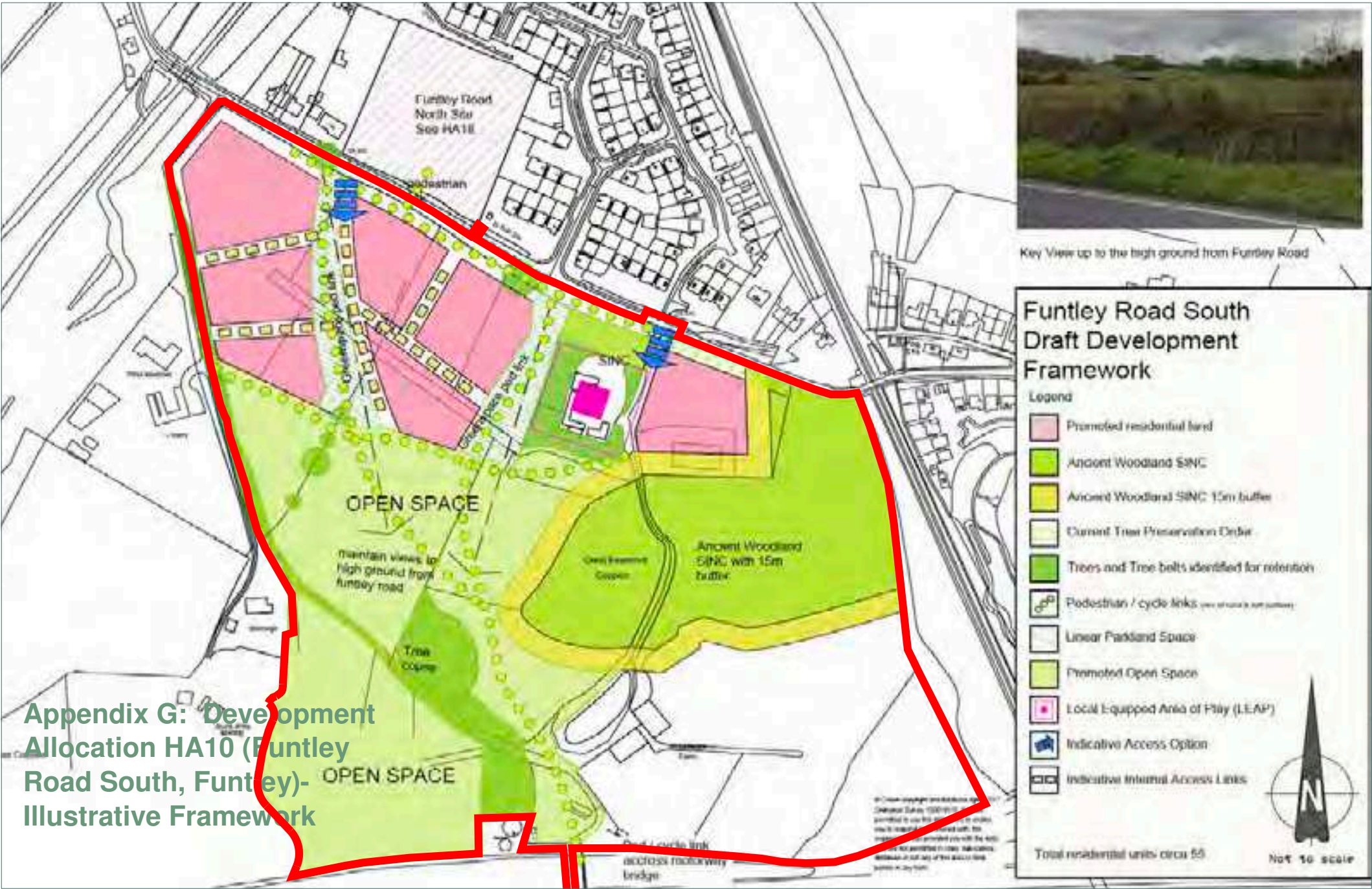
*“Development proposals will be permitted where they:*

- a) Respond positively to and be respectful of key characteristics of the area, including heritage assets, landscape, trees and landscape features, scale, spaciousness, form and the use of external materials;...*


*In all instances proposals shall have regard to the adopted Borough Design Guidance SPD.”*

In addition to the allocation pertaining to the Site, land to the north of Funtley Road (Funtley Road North Site HA18) is subject to an allocation for around 23 dwellings on land around 0.96ha in size (see Figure 2.4).

2. Baseline Conditions



Legend

-  Application Site Boundary

Appendix G: Development Allocation HA10 (Funtley Road South, Funtley)- Illustrative Framework

Figure 2.4 – Plan illustrating Development Allocation HA10 from the emerging Fareham Borough Council Local Plan 2036 (Draft Consultation Version)

## 2. Baseline Conditions

### 2.4 Introduction

The following paragraphs describe the landscape receptors firstly at contextual level and secondly at Application Site level.

### 2.5 Topographic Context

The topography of the study area is illustrated on the plan opposite in **Figure 2.5**.

Within the northern part of the study area, two major ridgelines predominately run in a broadly east to west orientation and stretch across the northern and north-eastern section of the study area. The heights are varied and reach approximately 50m AOD to Sager's Down located to the north west of the village of Knowle.

The River Meon runs in a north-east to south-west direction across the central part of the study area. It creates a large area of valley floor between the major settlement of Fareham and smaller suburb communities and villages to the west of the study area. To the east of the study area, the eastern section of the M27 motorway with the easternmost part of Fareham sits on the valley floor, which is formed by the Wallington River to the east of the study area.

The Application Site sits on the south-western fringe of Funtley village. The southern part of the Application Site lies on a ridgeline reaching approximately 55m AOD. The topography then falls towards Honey Lane to the west and Funtley Road to the north.

The value of this landscape receptor is assessed as ranging from **Low - Medium**.



2. Baseline Conditions

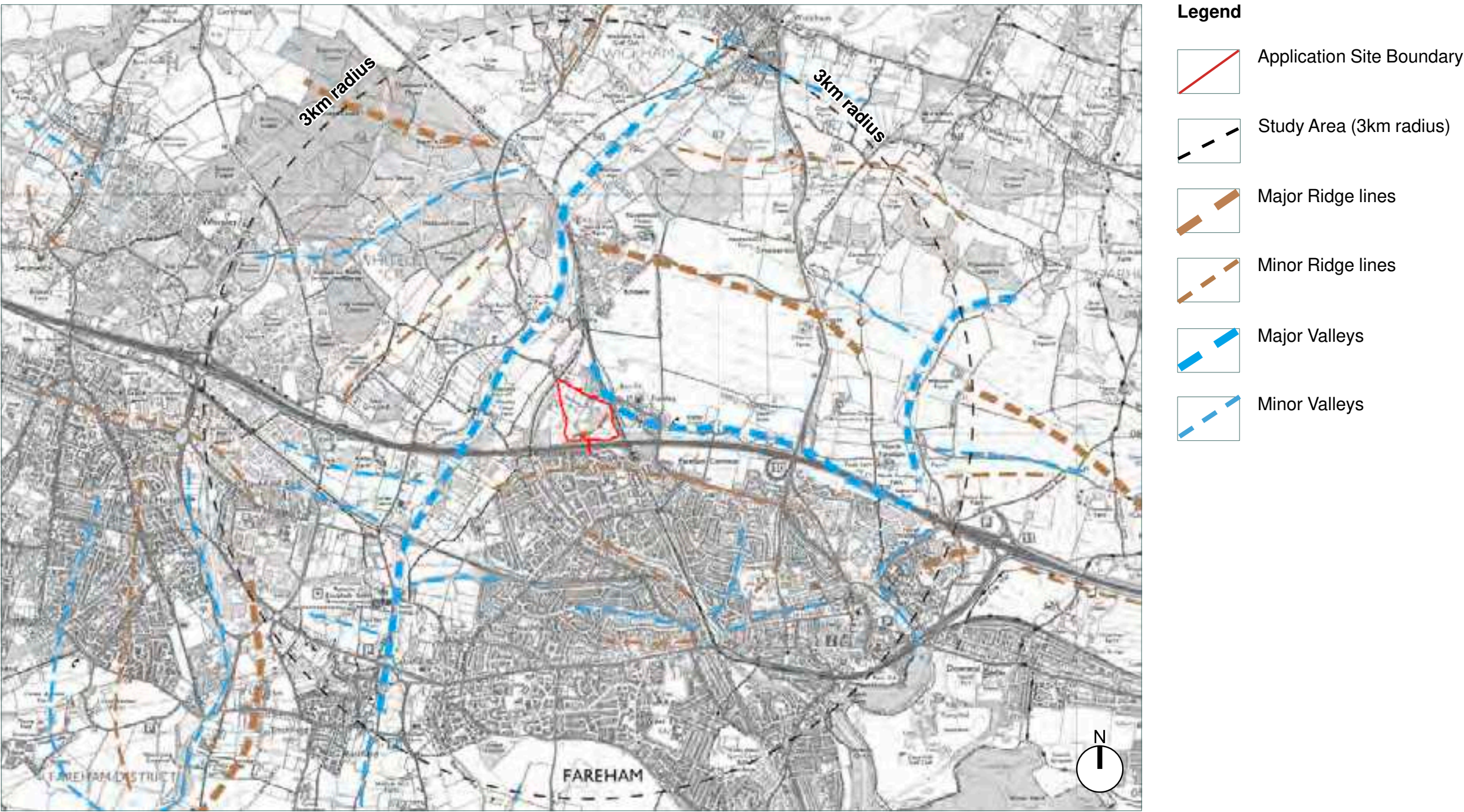


Figure 2.5 – Plan illustrating Topography and Drainage (fabrik, 2018)

## 2. Baseline Conditions

### 2.6 Contextual Landscape Elements

#### Broad Land Use and Land Cover:

Land cover across the northern part of study area is predominantly agricultural. A number of woodlands within the study area are either Ancient or Re-planted Woodlands. The Ancient Re-planted Woodland of Great Beamond Coppice is located within the north-eastern section of the Application Site.

The Great Beamond Coppice and the tree blocks within central northern and south-western section of the Application Site are also designated as Site of Importance for Nature Conservation (SINC) and are covered by a Tree Preservation Order (TPO).

Field patterns within the study area are predominantly of small to medium scale and bounded by dense hedgerows, trees and enclosed rural lanes. The settlement of Fareham and its associated suburban areas dominates the southern part of the study area, whilst the village of Knowle is located to the north east of the Application Site. A number of smaller settlements and farmsteads are also scattered across the study area.

There are a series of locally designated Historic Park and Gardens present within the study area. Uplands is located approximately 1.5km to the south east of the Application Site, whilst the Bishopswood is located approximately 1.9km to the south east.

Additionally, the Scheduled Ancient Monument of Funtley Iron Works, with a group of Grade II Listed buildings including Ironmaster's House and Funtley House, are situated approximately 500m to the south west of the Application Site along the Ironmill Lane.

The value of this landscape receptor are assessed as ranging from **Low - Medium**.



2. Baseline Conditions



Figure 2.6 – Plan illustrating land use within the study area (fabrik, 2018).

## 2. Baseline Conditions

### 2.7 Contextual Public Rights of Way

A series of public footpaths, bridleways with long distance trails are present across the study area.

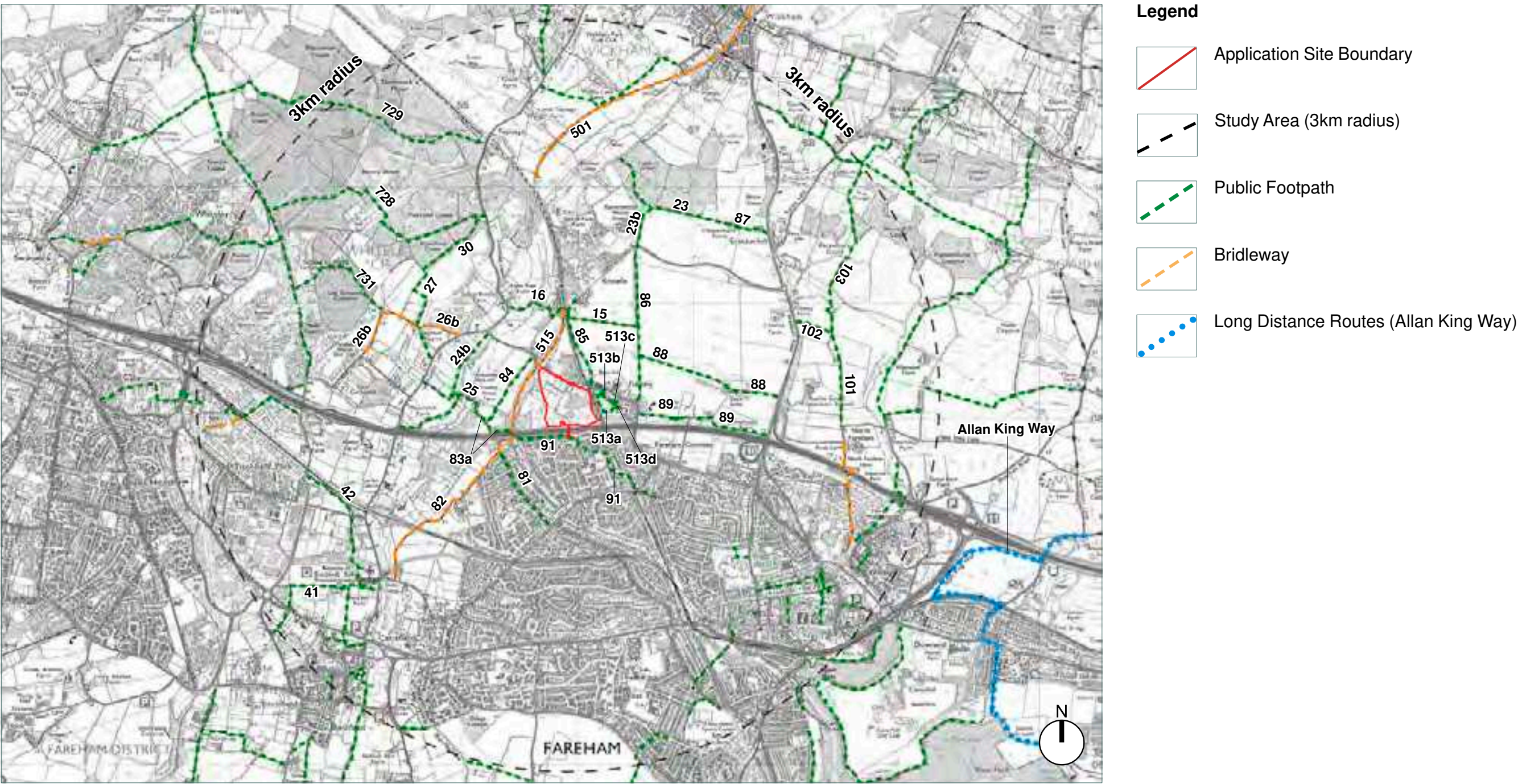
Public footpaths 85, 513a, 513b, 513c and 513d traverse the landscape to the north east of the Application Site and provide connectivity between Lakeside, Funtley Road and Totsome Cottage to the north. Bridleway 515 to the north west of the Application Site connects Funtley Road and Mayles Lane to the north-west, over the M27 to the south west. To the south of the Application Site footpath 91 runs in a north west - south east direction along the M27 and creates the connection between bridleway 82 to the west, Red Barn Lane and Highlands Road to the south east.

The long distance walk of Allan King Way is located at the south-eastern edge of the study area, approximately 3.63km to the south east of the Application Site. This route provides the connection between the eastern fringe of Fareham to the wider landscape via Paradise Lane to the north east and Downend Road to the south east.

The value of these landscape receptors are assessed as ranging from **Medium - High**.



2. Baseline Conditions



## 2. Baseline Conditions

### 2.8 Contextual Movement Corridors

The M27 motorway is the major transport link crossing the study area in an east - west orientation immediately south of the Application Site. The A32 (Wickham Road) and A27 are the primary links from the M27 into Wickham to the north and Portchester to the east.

The secondary and tertiary roads provide connections between Fareham and smaller villages such as Funtley and Knowle. Within the immediate setting of the Application Site, Funtley Road runs along the northern boundary and connects to Tichfield Lane to the north and Kiln Road to the south.

The nearest mainline railway station to the Site is approximately 2km away in Fareham to the south-east. It provides train connections to London Waterloo, Portsmouth and Southampton.

The value of the movement corridors as a receptor are assessed as ranging from **Low - Medium**.



2. Baseline Conditions

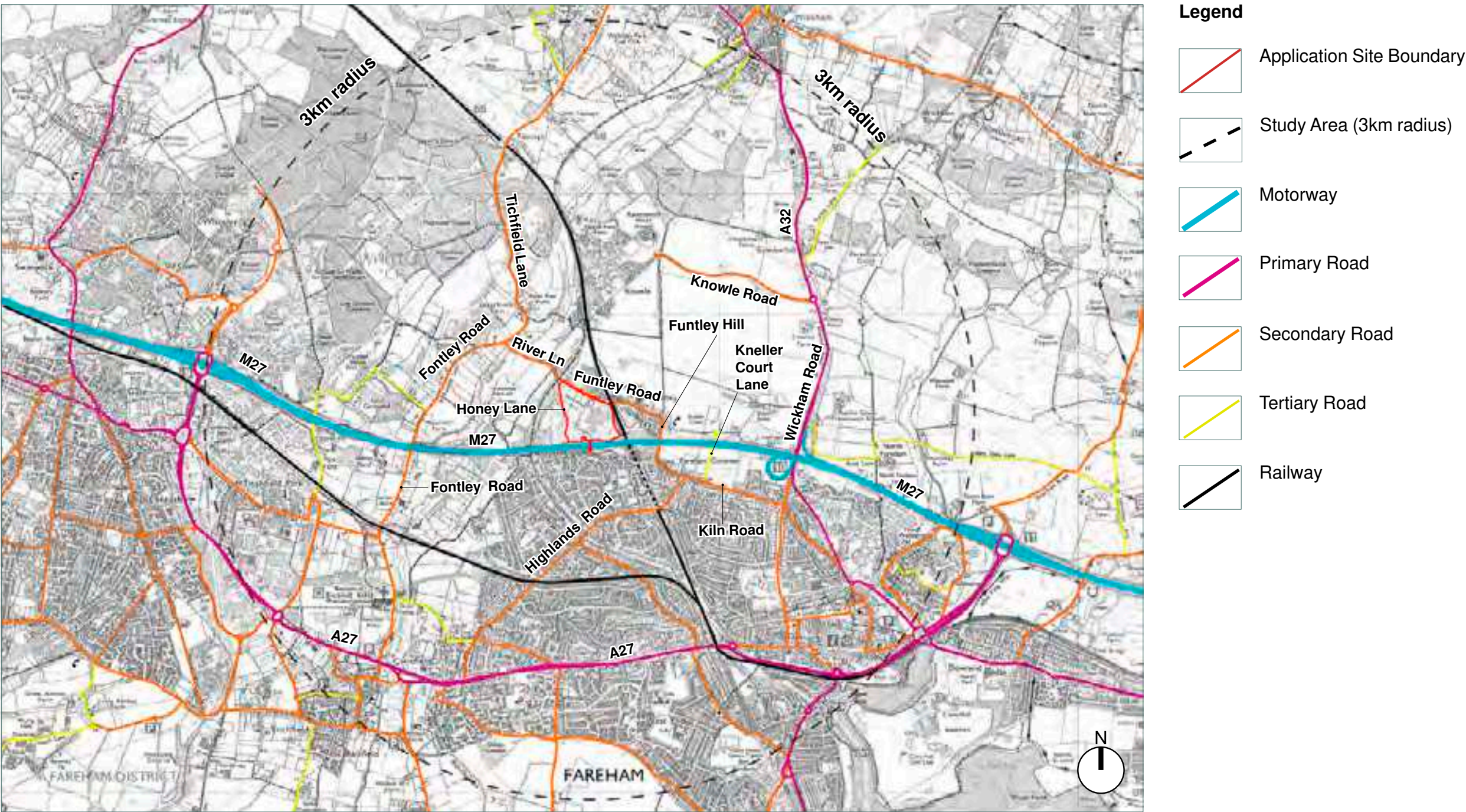


Figure 2.8 – Plan showing transportation links and road network within the study area (fabrik, 2018).



2. Baseline Conditions

2.9 Landscape Character Context

Introduction

The term ‘landscape’ commonly refers to the view or appearance of the land as perceived by people. Landscape applies to any natural, rural, urban, peri-urban areas, in land, water and seascape areas.

Landscape character is the combination of both natural / physical, cultural / social and perceptual / aesthetic influences, which give rise to a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse and which define the ‘sense of place’. The landscape is not therefore simply a visual phenomenon.

The following sections set out the landscape character framework of the study area from the national and regional level through to county and district scale based upon existing character assessments undertaken by Natural England, Hampshire County Council and Fareham Borough Council.

National Landscape Character Assessment

The general character of the English countryside has been described at a national level in the Natural England publications ‘National Character Area Profiles’. The Application Site is located in National Character Area 128: South Hampshire Lowlands (2014). Refer to **Figure 2.9**.

The summary of the landscape character related to the study area is described below:

*“The South Hampshire Lowlands National Character Area (NCA) is a low lying plain between the chalk hills of the Hampshire and South Downs and Southampton Water. Its highest point is an outlying chalk ridge – Portsdown Hill – but the bedrock geology is mostly open marine, estuarine and freshwater Tertiary deposits. The NCA*

*is dominated by the city and port of Southampton and its adjoining towns and suburbs – 29 per cent of the area is urban. In the more rural areas, it is a mixture of farmland, particularly pasture, and woodland.*

*Some 18 per cent of the land cover of the NCA is woodland, of which almost half is designated ancient woodland, a legacy of the Forest of Bere, a Royal Hunting Forest that once covered the area. Today the most significant blocks of woodland are West Walk near Wickham, Botley Wood at Swanwick and Ampfield Wood near Romsey.*

*The NCA is drained by several rivers: the lower reaches of the Test and Itchen, the source and headwaters of the Hamble and the middle section of the Meon.....”*

The key characteristics pertinent to the study area are described as:

- *“Low-lying, undulating plain abutting the chalk downs to the north... Soils over much of the area are heavy and clayey with localised pockets of more freely draining soils on higher land.*
- *Fast-flowing chalk rivers in wide, open valleys with watermeadows and riparian vegetation that provide valuable wildlife habitats...*
- *Well-wooded farmed landscape (particularly to the east of Southampton), characterised by ancient woodland such as Botley Wood and West Walk.....*
- *Mixed agricultural landscape dominated by pasture with small pockets of horticulture and arable.*
- *An intimate and enclosed field pattern with many small and irregular fields generally bounded by mixed-species hedgerows or woodland.*
- *In parts, a very urban NCA dominated by the city and port of Southampton and other large towns such as Waterlooville and*

*Havant. The more rural hinterland is characterised by small, loosely clustered or dispersed settlements, intermixed with isolated farmsteads.*

- *Fragmented by major transport links, including the M3 to London and the M27 to Portsmouth which cross the NCA.*

The Site is partly typical of the description for the NCA, forming part of farmland at the fringe of a major urban area. The context to the Site also includes major transport links, as well as dispersed settlements and a wider more rural agricultural landscape.

The value of this landscape receptor is assessed as ranging from **Low - High**.

2. Baseline Conditions

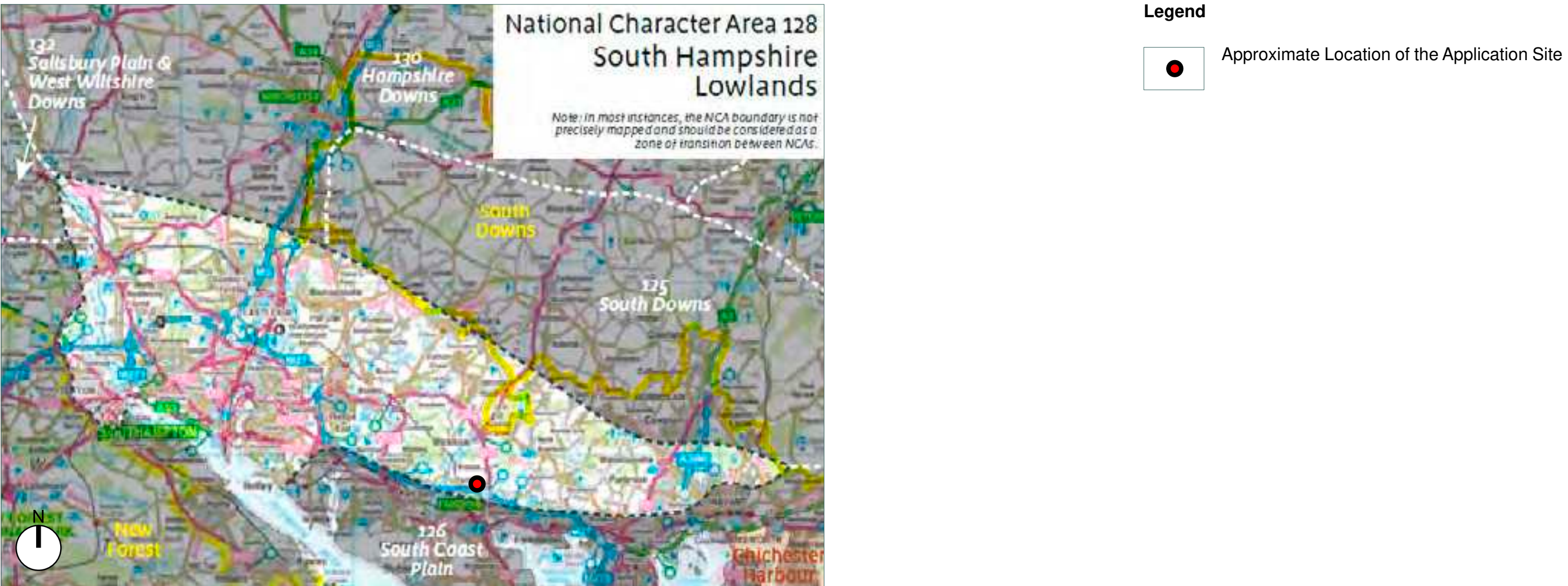


Figure 2.9 – Extract from National Landscape Character Area Map (Natural England, 2014)



## 2. Baseline Conditions

### 2.9 Landscape Character Context (continued)

#### County Landscape Character Assessment - 3E: Meon Valley

Within the Hampshire County Council Integrated Landscape Character Assessment (May 2012), the Application Site falls within LCA 3E: Meon Valley character area. Refer to **Figures 2.10 and 2.11**. The key characteristics pertinent to the study area as described as:

- *“A fairly narrow major river valley with a relatively narrow valley floor, which passes through downland, lowland mosaic and coastal plain landscapes.*
- *Southern valley sides are indented by dry valleys and scarp faces in the downland section.*
- *Increasing proportion of grazing and improved grassland land on the valley sides from the downland to the lowland landscapes.*
- *Woodland is common on the steeper slopes and is a particular feature where the Meon passes through the lowland mosaic and coastal plain landscapes.*
- *Major communication links follow close above the valley floor, eg A32, B3334 and the disused Meon Valley railway (now a recreational route).*
- *Extensive informal enclosure field patterns and significant water meadow (fairly simple layout) survive in the downs section while assarts and formal parliamentary enclosures dominate the lowland mosaic section.*
- *Strong pattern of nucleated settlements within the valley at strategic river crossing points with relatively little 20th century expansion.*

The physical character and land use related to the study area sets out that:

*“...The Meon Valley can be divided into upper, middle and lower reaches associated with changing geology and landform of the downs, lowland clay and coastal plain respectively...”*

*The middle section (Soberton Heath to just north of Titchfield Abbey) is characterised by the presence of waterlogged soils associated with London clay. Sandier lighter soils do occur in association with the Wittering formation either side of the Meon around Wickham. The valley sides are generally a shallower gradient than in the downland setting and the valley width is narrower. Improved grassland and dairying predominate and there is a greater presence of semi and unimproved grassland on the valley bottom and woodland cover on the sides...”*

The experience and perceptual character related to the study area is summarised as one where: *“The Meon Valley is full of contrasts and diversity. The downland section and lower reaches of the coastal section tend to be open landscapes whilst the opposite is true of the section in the lowland mosaic landscape. The course of the Meon valley is very distinct when viewed from the surrounding downland, appearing deceptively wooded in comparison to the surrounding chalk landscape. The river valley channel is rarely glimpsed amongst the heavily wooded landscapes in the lowland mosaic landscape.*

*There are numerous opportunities for public access along and through the Meon Valley, including sections of several long distance routes such as the Wayfarer’s Walk, Monarch’s Way, South Downs Way and Solent Way. There is also a disused single rail track which linked Fareham, Wickham and Alton which today provides a popular, relatively flat multi user route.*

*The valley landscape has largely resisted expansion from adjoining urban areas and has remained relatively unchanged in recent times. As a result there is a strong sense of ruralness, seclusion, and*

*intimate landscape character and lack of development where the valley cuts through the south Hampshire clay lowlands. In the section where the A32 runs through the valley it is generally less tranquil than the surrounding downland landscape....”*

The ‘Biodiversity Character’ is summarised as: *“... Beyond specific designations this landscape character area comprises improved grassland and arable land with patches of unimproved and semi-improved grassland (neutral or calcareous) and are often associated with the river, suggestive of water meadows. Woodlands form discrete patches within this landscape, ranging in size and type there are broadleaved woodlands, mixed plantations and parkland, some limited coniferous plantation and active coppice with standards. Ancient woodland is very limited in this landscape...”*

The Site is partly typical of the description for the county LCA, forming part of a valley that contains grazing land and woodland, with a nearby disused railway and public rights of way. The immediate Site context includes areas of relatively recent development and this and the Site is subject to some noise intrusion from the M27.

The value of this landscape receptor is assessed as ranging from **Low - High**.

2. Baseline Conditions

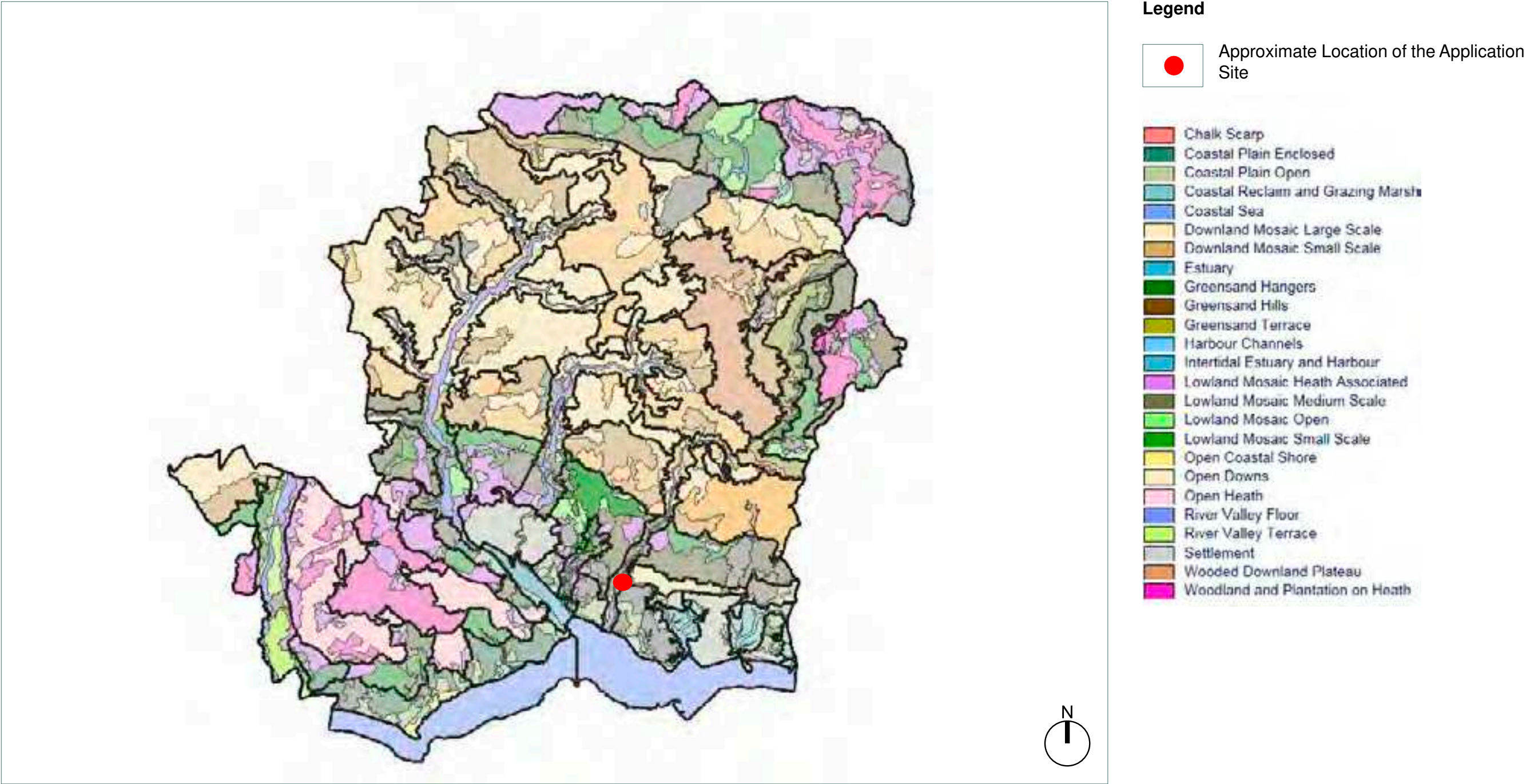
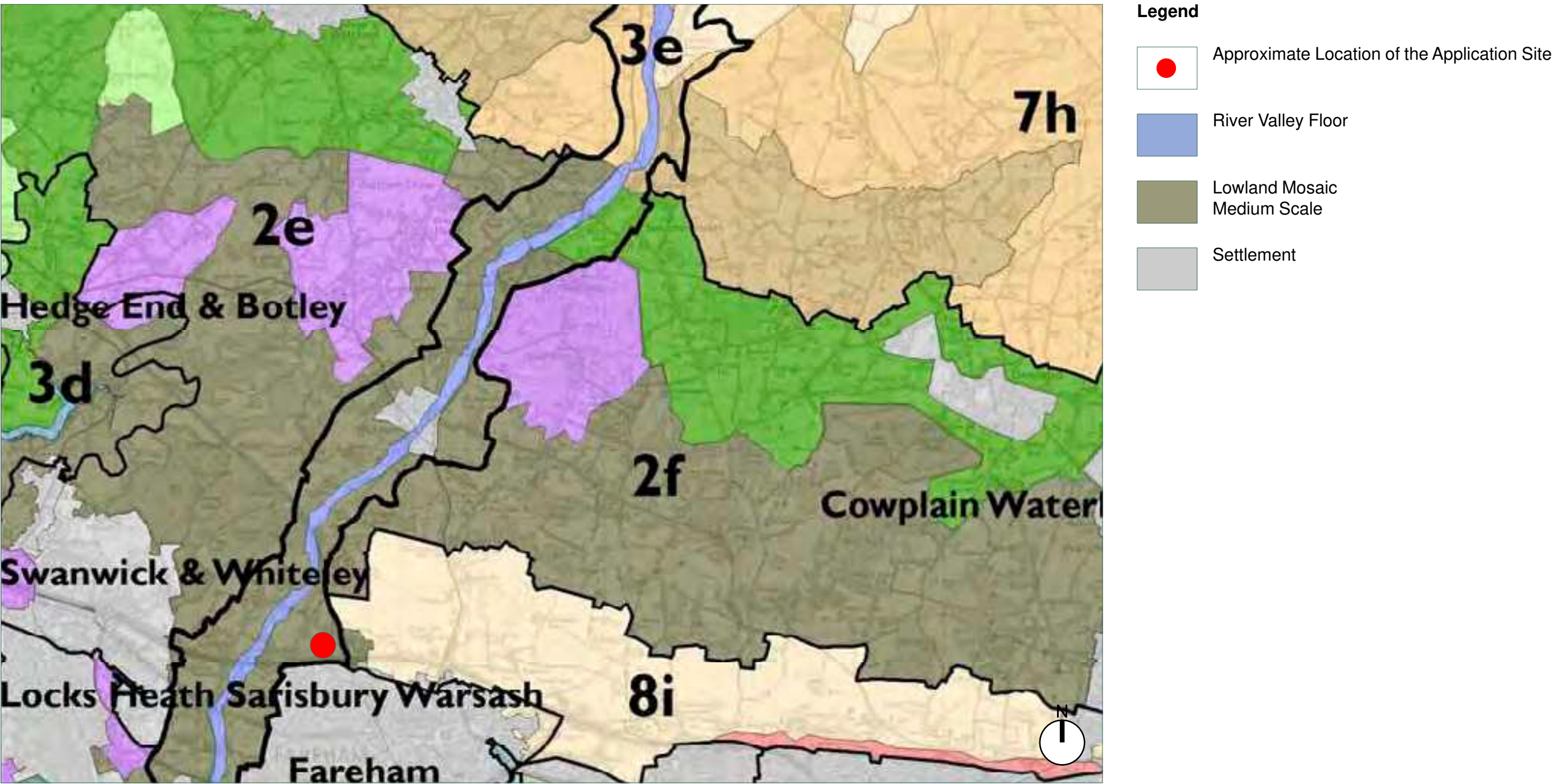


Figure 2.10 – Extract from Hampshire County Council Integrated Character Assessment Map (May 2012) showing the landscape types



2. Baseline Conditions



**Figure 2.11 – Extract** from Hampshire County Council Integrated Character Assessment Map (May 2012) showing the landscape character areas.



2. Baseline Conditions

2.9 Landscape Character Context (continued)

Local Level

Current Fareham Borough Landscape Assessment (May 1997)

This borough wide landscape character Assessment was carried out by Scott Wilson Resource Consultants for Fareham Borough Council in 1996 and covers both rural and urban areas.

Landscape Characters

Within Fareham Borough the assessment subdivides the landscape into 35 character areas (refer to **Figure 2.12**).

The Application Site is located entirely within the Landscape Character Area 6: Meon Valley. The character area is summarised as an area where:

*“The Meon Valley character area embraces the whole length of the valley within the Borough, from Funtley in the north to the coast at Titchfield Haven. Although the immediate floor and valley sides are quite narrow in places, the character area embraces a wider swathe of landscape on either side of the valley that broadly defines the extent of open countryside within the corridor between the urban edges of Stubbington, Hill Head and Fareham to the east and Titchfield Village and Titchfield Park to the west.”*

The following key characteristics are pertinent to the Application Site and its environs:

- *“a relatively gentle but distinctive valley landform, running through the Borough from Funtley in the north to the coast at Hill Head; Frequent woodland blocks;*
- *distinct valley floor characterised by small-scale pasture and variable cover of trees (typically willow and alder) in the narrower, upper reaches and broadening into open floodplain pasture and*

*complex of wetland communities to the south at Titchfield Haven, where the natural qualities of the valley and maritime influences are most strongly evident; Small copses add to wooded character;*

- *restricted vehicular access to the valley floor resulting in a generally quiet and intimate character in the northern and southern sections of the valley, making it attractive for quiet recreation and for wildlife;*
- *a mosaic of open farmland (part of the wider coastal plain farmland), minor wooded valleys and smaller, enclosed pastures bordering the valley to the south of Titchfield, the latter helping to buffer the intrusion of adjacent urban development and fringe farmland to the east on the setting of Titchfield Haven;*
- *a more fragmented character and stronger influences of urban development and roads within the central section of the valley, resulting in some damage to the integrity of the valley form and a more suburban character;*
- *garden centre and horticultural activity around Titchfield Abbey which detract from the setting of the historic Abbey and associated buildings (a Conservation Area);*
- *dense mosaic of wooded farmland mainly to the north of the railway which provides an intimate, rural context for the river valley, but with localised intrusion of the M27 motorway bridge.”*

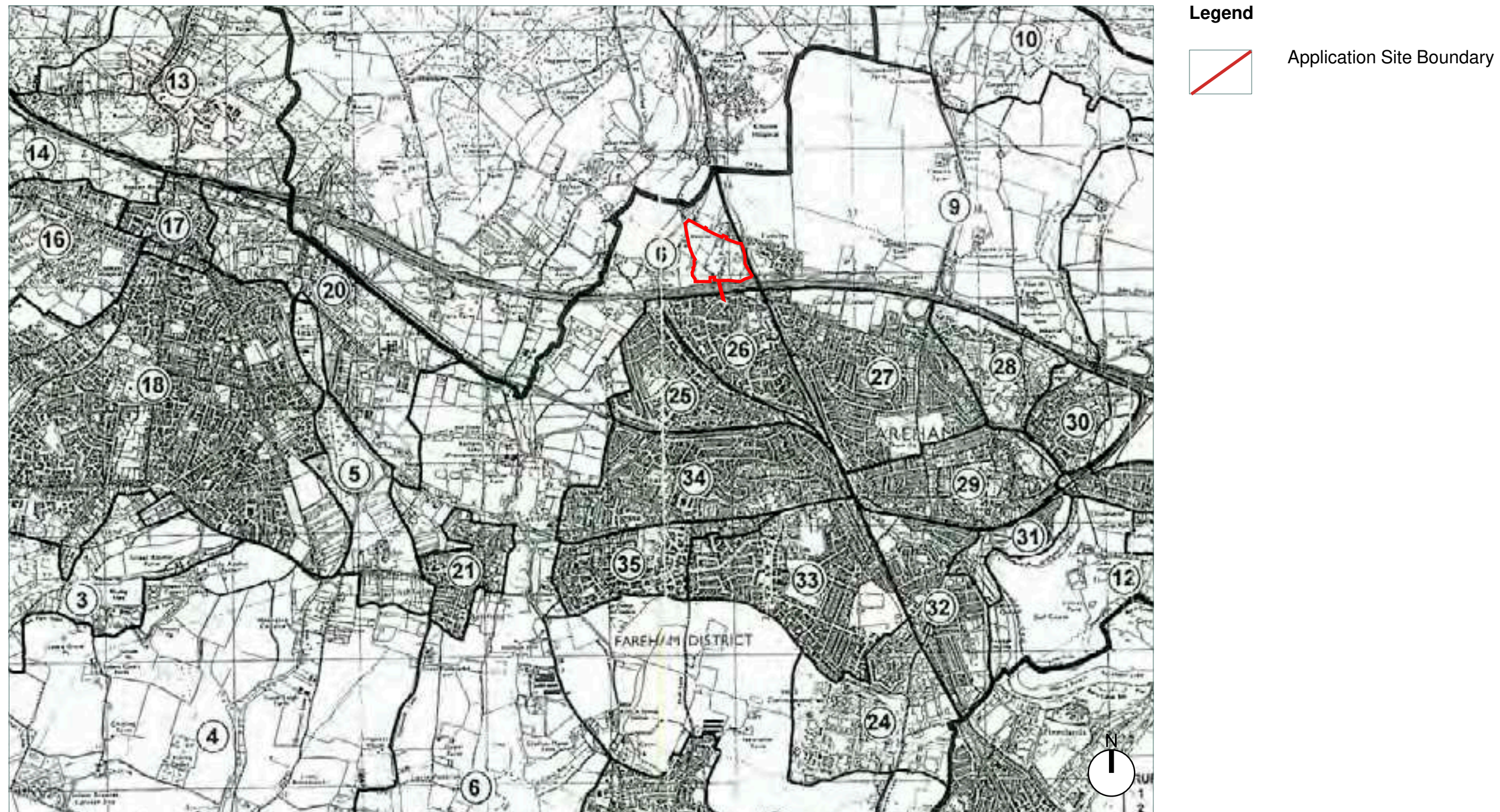
*In terms of enhancement opportunities, the assessment at para 4.27 states that: “... the Meon Valley is comparatively unspoilt and of a high quality but it is affected by roads, commercial horticultural activities and urban intrusions, particularly the central section. The emphasis should be to protect the important landscape and ecological resources of the river corridor, mitigate the effects of intrusive activities and undertake measures to reinforce the river valley character and strengthen its overall integrity.”*

The priorities for enhancement, relative to the Application Site include:

- *“to protect the important landscape, ecological and historical resources... the pastoral character and features of the valley floor, the complex of wooded farmland...”*
- *to protect the overall integrity of the valley system from further fragmentation;*
- *to resist changes that would have an adverse impact on the rural character of the valley;*
- *to reduce the impact of roads, urban edges and horticultural development, possibly through new planting.”*



## 2. Baseline Conditions



**Figure 2.12 – Extract** from Fareham Borough Landscape Character Assessment (May 1996) illustrating character areas.



2. Baseline Conditions

2.9 Landscape Character Context (continued)

Landscape Assessment (August 2017) Evidence Base to the Fareham Borough Council Local Plan 2036

As part of the evidence base to the emerging Local Plan, the Landscape Character Assessment has been updated. Part 1 includes the character assessment, with a landscape Sensitivity Assessment at Part 2.

In the updated assessment, the Application Site continues to be located in LCA 6: Meon Valley and within the Mixed Farmland and Woodland: Small Scale landscape type. The following extract is pertinent to the Application Site:

*“The Meon Valley character area embraces the whole length of the valley within the Borough, from Funtley in the north to the coast at Titchfield Haven. Although the immediate floor and valley sides are quite narrow in places, the character area embraces a wider swathe of landscape on either side of the valley that broadly defines the extent of open countryside within the corridor between the urban edges of Stubbington, Hill Head and Fareham to the east and Titchfield Village and Titchfield Park to the west.*

The Meon Valley is characterised by:

- *A relatively gentle but distinctive valley landform, running through the Borough from Funtley in the north to the coast at Hill Head;*
- *Distinct valley floor characterised by small-scale pasture and variable cover of trees (typically willow and alder) in the narrower, upper reaches and broadening into open floodplain pasture and complex of wetland communities to the south at Titchfield Haven...;*
- *A mosaic of open farmland (part of the wider coastal plain farmland), minor wooded valleys and smaller, enclosed pastures...;*

- *A more fragmented character and stronger influences of urban development and roads within the central section of the valley, resulting in some damage to the integrity of the valley form and a more suburban character;*
- *Dense mosaic of wooded farmland mainly to the north of the railway which provides an intimate, rural context for the river valley, but with localised intrusion of the M27 motorway bridge.”*

In Part 2 of the LCA, in the Sensitivity Assessment, the Application Site lies within Area 6.2 and sub section b, which is described as where: *“...built development also screens public views in from the edge of the Fareham urban boundary to the east.... The motorway cutting and railway corridors prevent views into the northern part of this area from the edge of Fareham and from the main village of Funtley. Wider views from the countryside areas to the north-west of this area are also screened by extensive vegetation cover and intervening landform, road and rail corridors etc...*

*Within the area, there are no views from the motorway or rail corridors that cross the valley, and views from much of the road network within the area (including Southampton Road, Segensworth Road and Titchfield Road), are also substantially screened by roadside vegetation or buildings, with only very occasional glimpses. There are, however, some more open views through or over the roadside hedgerows into the river floodplain from Mill Lane, the lower part of Fishers Hill and from Bridge Street, which forms the southern boundary, and from Funtley Road and River Lane in the north.*

*The main views of the area are obtained from the extensive public rights of way network that runs through the valley landscape... Further routes run parallel to the railway embankment that divides areas 6.2a and 6.2b, and along the valley sides and disused railway line in the vicinity of Funtley to the north. These routes are generally well connected, and offer an appreciation of the various landscape, ecological and historic features within the valley and an opportunity to experience its unspoilt qualities and underlying sense of seclusion. Overall the quality and value of the available views and visual amenity is high, although affected in places by the influence of built*

*development or unsightly land uses....*

*The main people who could potentially be affected by changes in views would therefore be local residents, users of the PRow network within the valley... and users of the local road network within the area itself.”*

In terms of Visual Sensitivity and Development Potential, the assessment identifies that: *“There are a few small pockets of land which are enclosed by strong hedgerows or vegetation an less visible, and/or lie within areas where views are already affected by built development or intrusive/ unsightly land uses (e.g. small pockets of undeveloped land within existing residential areas off the Funtley Road...) In all cases, any development would need to be small scale and sensitively integrated within the existing or new vegetation structure to avoid adverse visual impacts. Measures to improve the quality of views through the removal of intrusive or unsightly features... should be encouraged.”*

The assessment identifies the following relative to the Contribution to Green Infrastructure Network: *“This area makes a significant contribution to green infrastructure, particularly in respect of the riparian habitats and extensive areas of semi-natural woodland and tree cover within the river corridor (designated as SINC)s which are valuable ecological and landscape features. It also makes a significant contribution through the network of public rights of way that provide access for quiet recreation and appreciation of landscape, ecological and heritage assets... Crucially, this network provides both cross-valley links with the surrounding urban areas and links along the valley to the north and south. In addition to the PRow network, the area includes a few areas of publicly accessible open space, including a recreation ground to the north of the Southampton Road near Titchfield and playing fields, woodlands and the corridor of a disused railway line in the northern part of the area. The Meon Valley*  
**2.9 Landscape Character Context (continued)**

Landscape Assessment (August 2017) Evidence Base to the

## 2. Baseline Conditions

### Fareham Borough Council Local Plan 2036

is identified in the PUSH GI strategy as a 'sub-regional scale blue corridor' and project C6 of the strategy applies to the Upper Meon Valley and seeks "to conserve and enhance this area to ensure continued contribution to sense of place, climate change adaptation, providing open space close to urban areas for recreation and tourism".

The Fareham GI Strategy 2014 proposes a number of GI enhancement projects across the area, the majority of which form part of larger "borough wide" projects that will enhance the area's contribution to the wider GI network. These include:" (relevant to the local area and the Application Site)

"BW6 – General programme for the improvement/ repair of bridges within the rights of way network to ensure the continuation of high quality access to the countryside.

BW10 – Project to create a circular walking route encompassing the Meon Valley Trail, Shipwright's Way and South Down's Way, linking these existing routes together while enhancing their connectivity with the settlements of Fareham and Titchfield and the wider PRow network.

BW13 – Same as the PUSH Project C6 which applies to the whole of the Meon Valley LCA.

In terms of Sensitivity and Development Potential relative to GI the assessment states that: "Existing GI assets (e.g. the mosaic of riparian, grassland and woodland habitats as well as existing PRow and areas with public access) should be protected and, where possible, enhanced to maximise their ecological, landscape and amenity value, and development that would adversely affect them should be avoided. The emphasis in this area is more on making further improvements to the existing access and habitat links along the valley to the north and south, and the GI infrastructure within the urban areas to the east and west."

The conclusions of the study for the 6.2 area are set out under a sub-section, Development Criteria and Enhancement Opportunities. Those aspects pertinent to the Application Site state that: "This is an

area of high overall sensitivity, particularly in respect of the character and quality of the landscape resource, the abundance of valued landscape, ecological and heritage features across a large proportion of the area, its role in preventing the coalescence of settlements and maintaining their distinctive separate identities and landscape settings, and its significant contribution to green infrastructure, particularly in respect of ecological and landscape assets and the extensive network of public rights of way and access routes within the area.

This wide range of sensitivities mean that development potential is highly constrained across the entire valley landscape and any significant development is likely to have unacceptable impacts upon one or more of the area's important attributes. The only opportunity may be to accommodate development within small pockets of undeveloped land within existing residential areas, e.g. off the Funtley Road..., as long as it is of a similar character and scale to other dwellings within the locality and can be sensitively integrated within the landscape to avoid adverse impacts.

In order to protect and enhance the character and quality of landscape resources, views and visual amenity, urban character and green infrastructure, development proposals would need to:

- Protect and enhance features of recognised landscape, ecological, heritage or amenity value within the area as a whole, and the extensive network of public rights of way and other access routes within the valley...
- Protect and enhance the existing cover of woodland, trees, hedgerows and other mature vegetation along field boundaries, watercourses and roadsides, to maximise its screening, landscape and wildlife potential;
- Maintain the essentially secluded, rural and unspoilt countryside character of the valley landscape, and the local lanes and access routes within the area, avoiding intrusive or inappropriate urban styles of lighting, signage, paving etc. and other intrusive features;
- Be of a small-scale and located only in places where it can be carefully integrated within well-treed, strongly enclosed plots

of land in association with existing development, fits within the existing field pattern and is of a similar character and scale to similar built development within the locality;

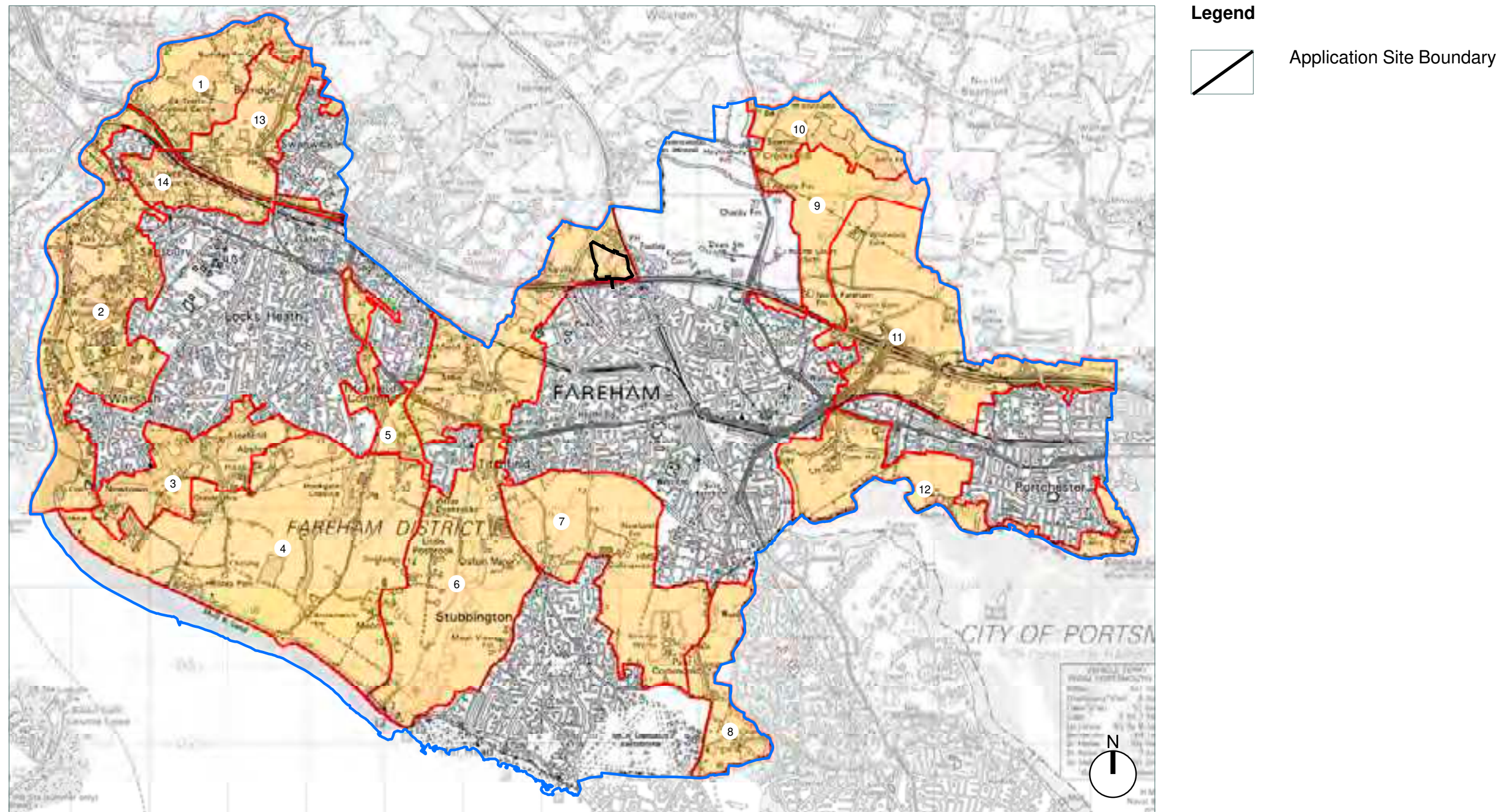
- Maintain and enhance the function and quality of the existing GI network (in accordance with the PUSH and Fareham GI strategies) and take advantage of opportunities to strengthen and extend access and habitat links within the area, in particular with other parts of the Meon Valley and the urban areas on either side of the valley;
- Provide enhancement of the valley landscape... through removal or mitigation of intrusive or unsightly features, and restoration of field boundaries and other landscape features within 'denuded' or degraded landscapes (e.g. areas used for horse grazing or horticulture with a weak hedgerow structure and 'fringe' characteristics)."

The Site is largely typical of the description for the borough LCA, forming part of a valley with pasture, open farmland, urban development and areas of woodland. The M27 motorway results in some intrusion, and this, and the woodland and landform limit views. As described by the LCA, the Site forms a pocket of land that is enclosed by vegetation and is already somewhat affected by existing residential areas off Funtley Road. Vegetation within the Site is also important to the green infrastructure network of the character area. Significant development is inappropriate but small pockets of development such as off Funtley Road may be accommodated if of a similar scale or character to other dwellings.

The value of the landscape character area are assessed as being Low - **Medium**.



## 2. Baseline Conditions



**Figure 2.13 – Extract** from Fareham Borough Landscape Character Assessment (2017) illustrating character areas.

2. Baseline Conditions

Table 2.1 Summary of Contextual Landscape Receptors and Value	
Landscape Receptors	Value
Heritage Assets	Medium
Topography	Low - Medium
Land Use	Low - Medium
Transport Links	Low - Medium
Public Rights of Way	Medium - High
Landscape Character	
National	Low - High
County	Low - High
Local	Low - Medium



2. Baseline Conditions

2.10 Existing Landscape Conditions at Site Level

Figure 2.14 illustrates the existing landscape elements within the Application Site.

Landscape Designations

The Application Site lies wholly in an Area Outside of the Defined Urban Settlement. The north-western section of the Application Site is designated as Existing Open Space. However, the emerging local plan proposes deletion of this existing open space and the incorporation of the site within the Funtley settlement boundary.

Great Beamond Coppice in the eastern part of the Application Site is an Ancient Re-planted Woodland, which together with the tree blocks within central northern and south-western sections of the Application Site are also designated as a SINC and are covered by a TPO.

Heritage Assets

There are no heritage designations on or adjacent to the Application Site, nor does it sit within or adjoin a Conversation Area.

Within the context to the Site is the Grade II Listed buildings of the Church of St Francis (to the east on Funtley Road). A Scheduled Ancient Monument, the site of Funtley Iron Works together with a group of Grade II Listed buildings including Ironmaster’s House and Funtley House are situated approximately 500m to the south west of Application Site, along the Ironmill Lane.

As such, at the site level, the value of this receptor is **Low**.

Topography

The Application Site lies on a north east facing slope with the localised steep ridgeline forming the southern boundary. The landform reaches approximately 52.98m AOD in the south west corner and falls towards a low point of approximately 18.77m AOD to the north-western corner of the Site.

The landform around the existing stables and built form within the north-eastern and southern part of the Application Site have been modified and where there is a level change of approximately 2m.

The value of this landscape receptor is assessed as **Medium** overall.

Land Use and Vegetation

The Application Site lies on the south-western fringe of the village of Funtley and is bound by Funtley Road to the north, Honey Lane to the west (and the elevated disused railway beyond) and the M27 to the south. There is currently no public access into the Site from the M27 and the footbridge. The Application Site is currently accessed from Funtley Road (opposite Stag Way).

The land use within the Application Site is predominantly pasture land (at the time of the assessment used as horse paddocks) bound by in the main by fencing comprising of timber post and rail, with additional wire in places. Woodland or hedgerows form some external and all external boundaries. There are also fences at the outer boundaries, within the vegetation. Access to the paddock is provided via a series of informal, mainly grassed private routes with the Site. Some hard surfacing occurs along the main access drive and parts of two tracks running west of this.

Small areas within the Application Site have been historically used as brick pit and brick yard. These have been restored back to agricultural use with imported clean soil and proposed planting following by the approval of the reinstatement scheme in April 2003 (Application Reference: P/03/0253/MW).

Great Beamond Coppice, alongside the other informal tree groups and treebelts form significant landscape features of the Application Site.

The value of this landscape receptor is assessed as **Medium** overall.

Landscape Character

The landscape character of the Application Site is described as consisting predominantly of a series of pasture fields with agricultural built form and associated hardstanding. The mature boundary vegetation and Great Beamond Coppice frames the fields and together with the landform, provides significant visual enclosure to the Application Site from the wider landscape.

The immediate setting to the Application Site comprises the predominantly two storey dwellings of Funtley to the north; the M27 motorway and the urban fringe of Fareham to the south; a combination of fields and dwellings to the west which is contained from the wider landscape by the mature tree belt associated with the elevated disused railway line; and to the east by the railway line in cutting and associated vegetation.

The northern section of the Application Site is therefore already influenced by the existing residential edges and is of a typical semi-enclosed character, consistent with the western edge of Funtley.

As set out under the published landscape character assessment section above, the Site is largely typical of the defined borough character area within which it lies.

The value of this landscape receptor is assessed as **Medium**.

Public Rights of Way

There are no public rights of ways located within or along the Site. However, the bridleway 515 (former railway line) is located in close proximity (approximately 38m) to the north-western part of the Site.

The value of this landscape receptor is therefore assessed as **Low**.

2. Baseline Conditions



Figure 2.14 – Plan showing the existing landscape conditions within the Site (fabrik, 2018)

2. Baseline Conditions

Table 2.2 Summary of Landscape Receptors and Value within Site	
Landscape Receptors	Value
Landscape Character	Medium
Heritage Assets	Low
Topography	Medium
Land Use and Vegetation	Medium
Landscape Character	Medium
Public Rights of Way	Low



## 2. Baseline Conditions

### 2.11 Internal Visual Survey

A visual inspection of the Application Site was conducted on 7th June 2017. A winter visual appraisal was carried out on 5th January 2018.

Figure 2.15 on the following page illustrates the location of the internal photographic viewpoints to the Site. Photos 1- 15 which follow, illustrate the existing Application Site conditions. Photos 14A and 15A are taken from slightly different positions to the summer photos. Photo 13A is taken from inside the Site, adjacent to the boundary, representing a winter view that is similar to summer external viewpoint 4.

While the summer and winter views show slight differences in the position of the viewpoint and focal lengths of camera lens used, there are otherwise, no material differences in the view.

2. Baseline Conditions



Figure 2.15 – Plan illustrating locations of internal photographs within the Site (fabrik, 2018)



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site

Summer Views



**Photograph – Viewpoint S1**  
View looking south from Funtley Road towards the northern portion of the Application Site. The existing tarmacadam access road is visible centrally within this view. The access road is lined by mature trees and established vegetation, which largely obscures views into the internal ground plane of the Site.



**Photograph – Viewpoint S3**  
View looking north towards the northern Site boundary from the north-eastern part of the Application Site. The existing pasture grassland dominates this view with topography sloping towards the northern boundary. The mature tree belt lines along the north-eastern boundary obscure views out of the Application Site from this location.



**Photograph – Viewpoint S2**  
View looking south west across the eastern portion of the Application Site from north-eastern corner. The existing pasture land dominates the foreground with topography rising towards the south. The existing built form is apparent in the middle distance with the Ancient Re-planted Woodland of Great Beamond Coppice evident in the distance. Views out to the east, west and south are obscured by the intervening mature boundary vegetation and landform.



**Photograph – Viewpoint S4**  
View looking west towards the western boundary of the Application Site. The existing hardstanding forms the foreground of this view, interspersed with existing stable units in the middle distance. The existing mature trees and vegetation are apparent behind the existing stable blocks and obscure views out to the west from this location.



## 2. Baseline Conditions

### 2.11 Photographic Study - views within the Application Site

#### Winter Views



**Photograph** – Viewpoint S1 Winter View

There is little change to the visibility across the Site in winter.



**Photograph** – Viewpoint S2 Winter View

There is little change to the visibility across the Site in winter.



**Photograph** – Viewpoint S3 Winter View

There is slightly increased visibility towards vehicles on Funtley Road and of dwellings to the north of the Site, in winter.



**Photograph** – Viewpoint S4 Winter View

There is little change to the visibility across the Site in winter.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Summer Views



**Photograph – Viewpoint S5**  
View looking south west across paddocks within northern central section of the Application Site. The existing pasture grassland dominates the foreground, set on rising ground. Due to a section of lower hedging along the south-western Application Site boundary, the existing built form along southern section of Honey Lane is apparent in the distance.



**Photograph – Viewpoint S6**  
View looking south west across paddocks within northern central section of the Application Site. The existing pasture grassland dominates the foreground with topography rising to meet the southern and south-western Site boundaries in the distance. Due to a section of lower hedging along the south-western Application Site boundary, the existing built form along southern section of Honey Lane is apparent in the distance.



**Photograph – Viewpoint S7**  
View looking south west across paddocks within the south-eastern section of the Application Site. The existing pasture grassland dominates the foreground with topography rising towards the ridgeline in the middle distance. The existing vegetation is apparent in the distance, however, glimpsed views of the roofline of the existing residential built form along Lechlade Gardens (south of the M27) are apparent from this location.



**Photograph – Viewpoint S8**  
View looking west across paddocks within the south-eastern part of the Application Site. The existing grass path and pasture grassland dominates this view with topography gently rising to meet the existing barns in the distance. The existing mature vegetation along the southern part of the Application Site and Great Beamond Coppice is evident in the distance and along with topography, obscures views out to the west and south from this location.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Winter Views



**Photograph – Viewpoint S5 - Winter View**  
Visibility across the Site remains largely the same in winter.



**Photograph – Viewpoint S6 - Winter View**  
Visibility across the Site remains largely the same in winter, albeit there is slightly increased visibility of the property along Honey Lane. The landform prevents significant views beyond the Site boundary despite reduced leaf cover.



**Photograph – Viewpoint S7 - Winter View**  
Visibility across the Site remains largely the same in winter. There is however, slightly increased visibility of existing dwellings south of the M27, without leaf cover to vegetation.



**Photograph – Viewpoint S8 - Winter View**  
Visibility across the Site remains largely the same in winter. The landform prevents significant views beyond the Site boundary despite reduced leaf cover.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Summer Views



**Photograph – Viewpoint S9**  
View looking east across paddocks within the south-western section of the Application Site. The existing pasture grassland dominates the foreground with the landform falling towards the mature tree line in the middle distance. The existing mature vegetation along the south east section of the Application Site is apparent in the distance and obscures the majority of views out to the east and south. However, glimpsed views of rooflines of the existing residential built form within Funtley beyond the site, are apparent in the distance.



**Photograph – Viewpoint S11**  
View looking north across paddocks within the south-western section of the Application Site. The existing pasture grassland dominates this view with topography rising to meet the field boundary. Existing vegetation along the western boundary and trees to the east are apparent and with landform, limits views out to the west and east. However, glimpsed views of a wider elevated landscape are evident in the distance to the north.



**Photograph – Viewpoint S10**  
View looking north east within the central part of the Application Site. The existing understorey vegetation dominates the foreground with mature trees along the internal field boundaries. The existing topography slopes towards the north with views of Great Beamond Coppice apparent in the middle distance. Due to the existing landform, the roofline of existing residential built form along Funtley Road and Roebuck Avenue are apparent in the distance. Glimpsed views of an existing 3 storey built form within neighbouring village of Knowle are also evident in the far distance, through gaps within the existing boundary vegetation and landform.



**Photograph – Viewpoint S12**  
View looking north across paddocks within the south-western section of the Application Site. The existing pasture grassland dominates this view with the existing topography falling steeply towards the north. An existing tree line to the east is evident in the distance and obscures views out to the east from this location. However, views of wider landscape to the north are evident with existing built form along Funtley Road visible due to existing landform.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Winter Views



**Photograph – Viewpoint S9 - Winter View**  
There is slightly increased visibility beyond the Site, including of dwellings within Funtley, in winter.



**Photograph – Viewpoint S10 - Winter View**  
The photo is taken standing slightly closer to the fenceline than in summer. The lack of leaf cover allows increased visibility across the Site and to existing dwellings within Funtley and within Knowle village.



**Photograph – Viewpoint S11 - Winter View**  
The viewing position is from a slightly higher point, allowing views across the Application Site as it slopes down to the north, and of existing properties just north of the Site, the disused railway line to the west, and wider elevated landscape beyond the built form at Funtley. Parts of built form at Knowle village and pylons form part of the scene to the north.



**Photograph – Viewpoint S12 - Winter View**  
There is slightly increased visibility within the Site in winter, with glimpses of the barns in the south-eastern part area. The glimpses of Funtley and Knowle village (to left, beyond edge of photo) remain in winter.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Summer Views



**Photograph – Viewpoint S13**

View looking north east across paddocks within the western part of the Application Site. The existing pasture grassland dominates this view with topography falling steeply towards the northern boundary. Partial views of hardstanding within the northern part of the Application Site are evident in the distance to the north east. Due to the existing topography, views of wider landscape beyond the Application Site are evident with existing built form along Funtley Road and Roebuck Avenue apparent from this location.



**Photograph – Viewpoint S14**

View looking east across paddocks within the north-western part of the Application Site. The existing pasture dominates this view with existing undulating topography rising towards to east and south west. The existing vegetation along northern boundary of the Application Site is visible with views of Great Beamond Coppice evident in the distance. Views out to east and south are obscured by the dense vegetation within Application Site. However, views of roof and upper storey of existing two storey built form along western part of Funtley Road are apparent through gaps within vegetation and landform.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Winter Views



**Photograph** – Viewpoint S13 Winter View  
In winter, the reduced leaf cover reveals more of the existing built form to the north of the Site.



**Photograph** – Viewpoint S14A Winter View  
The viewpoint is taken from the access path south of the paddock from which summer view 14 was taken. In winter, there is slightly increased visibility of existing built form at Funtley to the north of the Site.



**Photograph** – Viewpoint S13A additional Winter View  
View looking north to north-east from the south-western edge of the Site, by the boundary hedge which separates the Site from the existing property at the southern end of Honey Lane. This photo also provides a winter equivalent of external viewpoint 4. Existing built form at Funtley and further north of the village is visible beyond the Site. Existing outbuildings and part of Great Beamond Coppice are visible to the right in the photo.



2. Baseline Conditions

2.11 Photographic Study - views within the Application Site (Continued)

Summer and Winter Views



**Photograph – Viewpoint S15**  
View looking south east across paddocks from the north-western part of the Application Site. The existing pasture dominates this view with existing undulating topography rising towards the south. The existing vegetation along the western Application Site boundary is visible with views of Great Beamond Coppice evident in the distance. The dense vegetation within the Application Site obscures views out to the west and south.



**Photograph – Viewpoint S15A Winter View**  
The viewpoint is taken from the access path north of the paddock from which summer view 15 was taken. The landform and dense vegetation within the Site and at its boundaries mean that visibility beyond the Site remains similar in winter. There is a very limited glimpse of the roof of the building at the south end of Honey Lane (adjacent to the Site) and of the roof of a vehicle parked within its curtilage.

### 3. Visual Baseline Conditions and Sensitivities

#### 3.1 Introduction

The extent to which the internal ground plane and vegetation associated with the Application Site are visible from the surrounding landscape is based on grading degrees of visibility. It is determined from a visual inspection of the land within the Site and its context from roads, public rights of way and properties.

Seasonal change in existing evergreen and deciduous plant material will affect the available views. Typically views will be different through the seasons with a greater sense of enclosure in the summer months when deciduous trees are in leaf.

The plans that follow show the actual visual summary of the Application Site from the immediate environs. The photographs 1-19 then describe each of these views.

No winter views were taken for photo viewpoints 15-19 due to the significant level of visual screening by vegetation and in places, by landform.

#### 3.2 Visual Appraisal

The plans on the following pages (Figures 3.1 and 3.2) illustrate the visual summary of the land within the Application Site from the surrounding landscape.

Views of the internal ground plane and vegetation of the Application Site are limited to the immediate local landscape due to the undulating topography and intervening layers of vegetation and build form.

#### Residential Receptors

Views from residential receptors are limited to those located in close proximity to the Site along the Funtley Road, Roebuck Avenue, Stag Way and Honey Lane. Refer to photographs 4 - 8.

There is slightly increased visibility of the Site in winter, in particular for properties along the south sides of Funtley Road which have windows facing in the direction of the Site.

The value of the residential receptors is judged to be **medium**.

#### Historic Receptors

There are no views from the Listed Buildings and Scheduled Ancient Monument located in the study area - along the Ironmill Lane and Skylark Meadows within Skylark Golf and Country Club. Refer to photographs 11 and 19. There is no significant change in the visibility in winter, and these receptors are not considered as part of the visual impact appraisal.

#### Transport Corridors

There are open and partial views of the internal ground plane and landscape features of the Application Site from Funtley Road, Roebuck Avenue and southern section of Honey Lane. Views are only from those parts of these roads in close proximity to the Site. Views from the wider road network are truncated. Refer to photographs 4 - 8.

There are slightly increased views into the Site in winter from Funtley Road and Roebuck Avenue, without leaf cover. Views from Honey Lane remain largely obscured except for two sections to the north and south where there is a gap in the vegetation (north) and a low hedge (south) at the boundary with the Site.

The value of the transport corridors is judged to be **low**.

#### Public Rights of Way

The majority of receptors from the public rights of ways within the local, middle distance and wider landscape are truncated due to intervening topography, vegetation and built form. Refer to photographs 1, 2, 11 - 19.

In winter, from viewpoint 2 (path around the lake by Lakeside) within Funtley, there are increased glimpses through the vegetation along the railway embankments. As the ground plane of the Site is not discernible, it is not possible to distinguish any vegetation within the Site from the general dense vegetation visible around the railway line from this location.

Reduced leaf cover to vegetation along the disused railway line to the west of the Site (Bridleway 515) allows glimpses through to the ground plane of the Site, but only from positions in close proximity to the crossing over Funtley Road (photographs 12A and 14A). In these views, existing built form at Funtley is also visible.

The highest part of the Site to the south, around the existing telecommunications mast is visible as a part of panoramic views looking back to Funtley village from two Public Rights of Way to the east - see photographs 9 and 10 (from Footpaths 88 and 89 respectively).

From viewpoint 9 in winter, the ground plane of a small part of the south-eastern part of the Site, the telecomms mast and nearby existing barns are visible, together with Great Beamond Coppice and other boundary vegetation within the south eastern area of the Site.

From viewpoint 10 in winter, the upper part of the mast, barns and small part of the Copse are visible above existing dwellings and vegetation at the edge of Funtley. The ground plane of the Site is obscured, even in winter.

No extensive views across the ground plane of the Site are available from these locations.

The existing southern boundary vegetation is visible from the M27 footbridge to the immediate south (photograph 3) however, this vegetation in turn obscures internal views of the land within the Application Site.

The value of the users of the public rights of way is judged to be **medium**.

Page intentionally left blank



3. Visual Baseline Conditions and Sensitivities

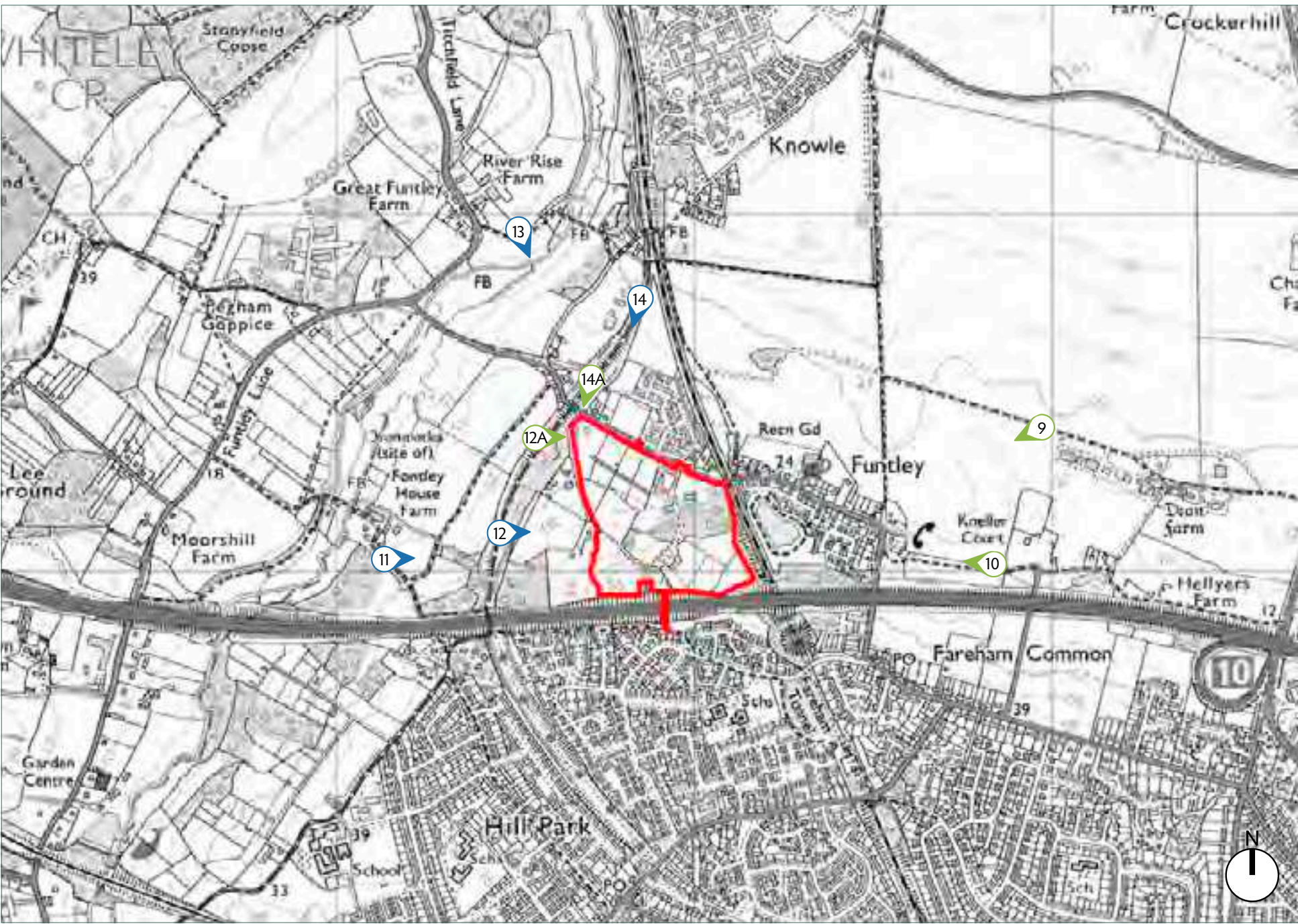


Figure 3.1 – Location Plan showing Visual Summary from the local area (fabrik, 2018)

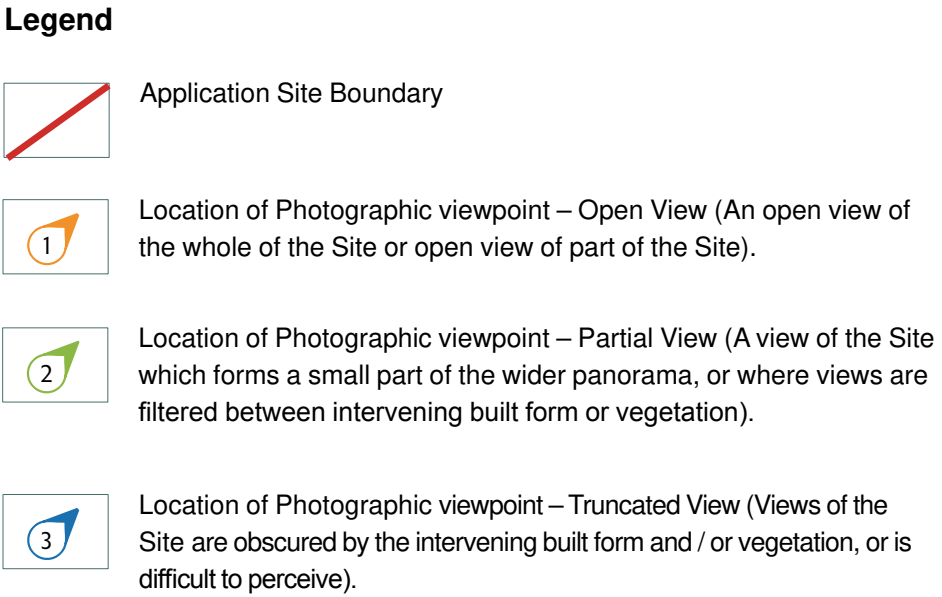


Figure 3.2 – Location Plan showing Visual Summary in close proximity to the Site (fabrik, 2017)



3. Visual Baseline Conditions and Sensitivities

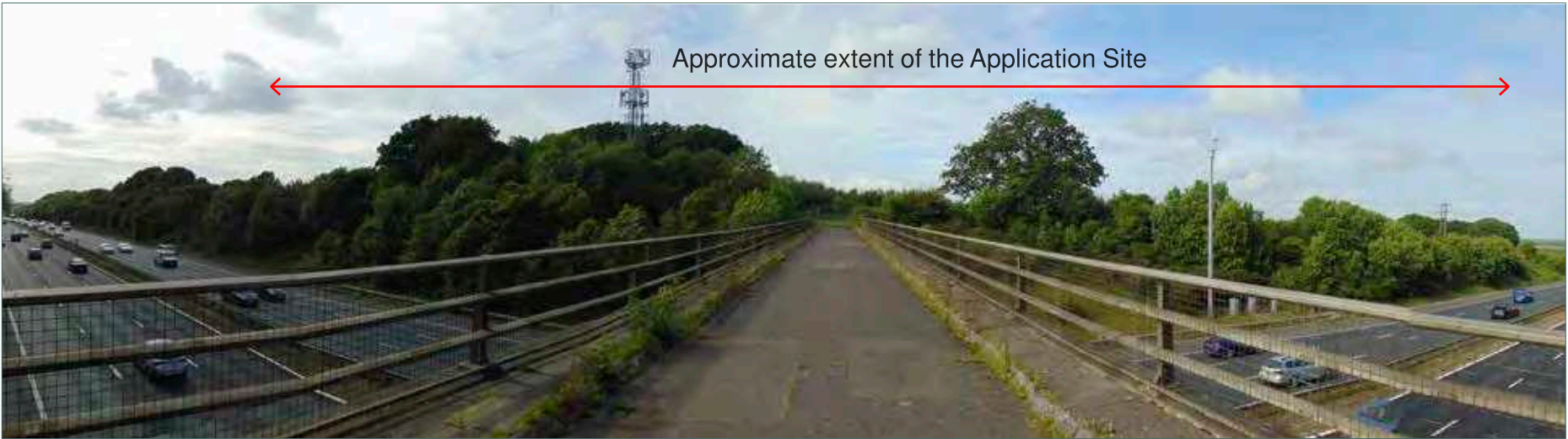
3.3 Visual Appraisal from the Local Area  
Summer Views



**Photograph – Viewpoint 1**  
View looking south west towards the Application Site from the eastern section of Funtley Lane (Footpath 85). The existing residential built form along Funtley Lane dominates this view with mature hedgerow forming a vegetated edge along this part of the lane. Glimpsed views of the top section of Great Beamond Coppice along the north-eastern edge of the Application Site is apparent. Views of the internal ground plane within the Application Site are truncated.



**Photograph – Viewpoint 2**  
View looking west towards the Application Site from an informal footpath at the edge of the lake to the south west of Lakeside (south of Funtley Road). Mature trees and vegetation dominate this view and forms a green corridor along the path. The intervening vegetation, which includes that alongside the live railway (right, truncates any views of the internal ground plane within the Application Site from this location.



**Photograph – Viewpoint 3**  
View looking north towards the Application Site from the footbridge to the south of the Application Site over the M27. The footbridge and the mature tree belt planted along the motorway edge dominates this view. Partial views of the existing mature trees and vegetation along the southern Application Site are evident behind the existing vegetation that lines the motorway. Views into other areas across the Application Site are truncated by the intervening vegetation and topography from this location.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area  
Winter Views



**Photograph** – Viewpoint 1 Winter View  
The photo is taken from a position standing slightly further west along Funtley Lane (due to the presence of a large vehicle on the road). However, in winter, there is no significant change in the visibility of the Site in winter from any section of this lane.



**Photograph** – Viewpoint 2 Winter View  
There is no significant change in the visibility of the Site in winter.



**Photograph** – Viewpoint 3 Winter View  
There is no significant change in the visibility of the Site in winter.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area

Summer Views



**Photograph – Viewpoint 4**  
View looking east towards the Application Site from the existing hardstanding area associated with the private dwelling ‘Bramleigh’ located on Honey Lane. The existing boundary vegetation and pasture grassland within the Application Site dominates the view. Open view of the internal plane, boundary vegetation and the Great Beamond Coppice are apparent from this location.



**Photograph – Viewpoint 5**  
View looking south east towards the Application Site from Funtley Road (by properties just east of the disused railway bridge). Views of existing residential built form along Funtley Road dominate the foreground with mature trees and vegetation along the northern Application Site boundary apparent. Views of the internal ground plane within the Site are truncated due to intervening boundary vegetation.



**Photograph – Viewpoint 6**  
View looking south east towards the Application Site from the junction of Roebuck Avenue and Funtley Road. Views of existing residential built form around the entrance of Roebuck Avenue and mature trees and vegetation along the northern Site are apparent. Views of the internal ground plane within the Application Site are truncated due to intervening boundary vegetation.



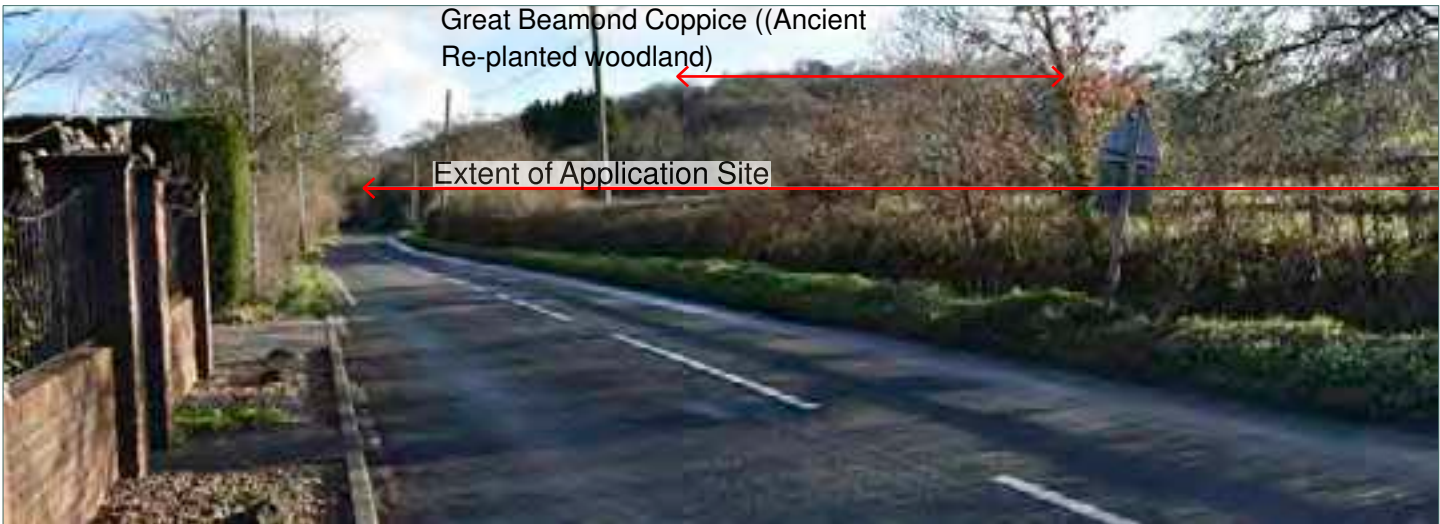
**Photograph – Viewpoint 6b**  
View looking south east towards the Application Site from Roebuck Avenue. The residential built form with its associated private garden along Roebuck Avenue dominates this view with the topography within the Application Site rising towards the local ridgeline. Open views of the central part within the Application Site occur, funnelled along the road with mature vegetation evident in the distance. Views into other areas within the Application Site are truncated by intervening vegetation, topography and built form from this location.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area  
Winter Views

Note: For the winter photo relating to Viewpoint 4 (taken from curtilage to Bramleigh), refer to internal winter viewpoint 13A (above) which is taken from the Site-side of the hedge at the boundary with the property Bramleigh.



**Photograph – Viewpoint 5 Winter View**  
In winter, the ground plane of the Site becomes apparent without leaf cover to the northern boundary vegetation.



**Photograph – Viewpoint 6 Winter View**  
There is little change in the visibility of the Site in winter.



**Photograph – Viewpoint 6b Winter View**  
There is slightly increased visibility of the Site in winter.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area

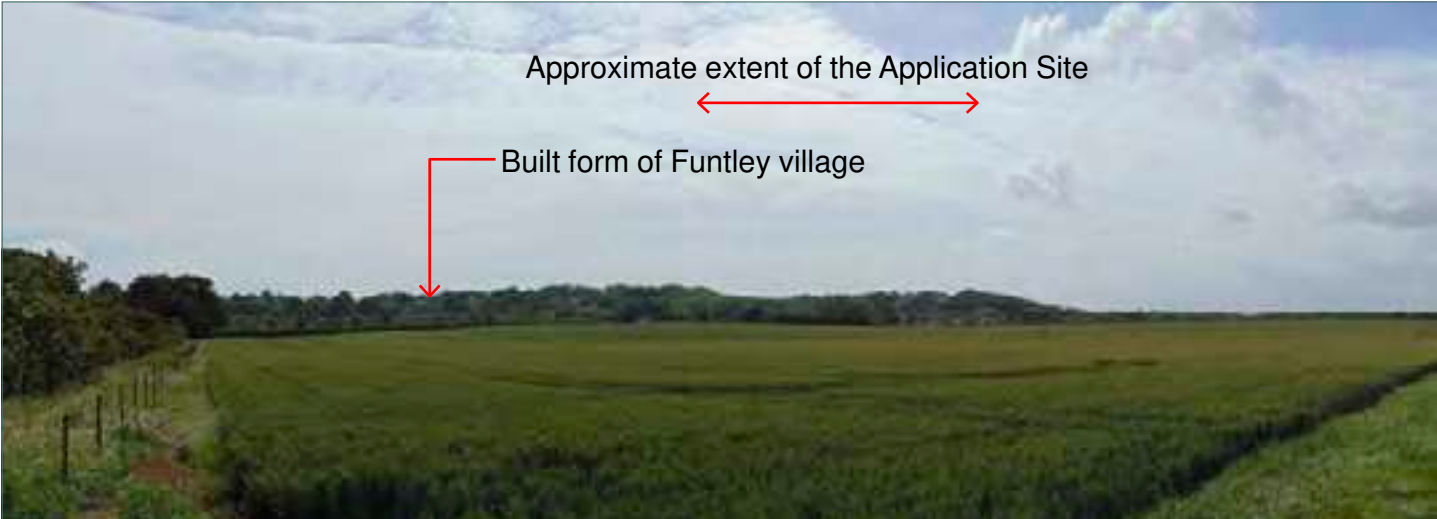
Summer Views



**Photograph – Viewpoint 7**  
View looking south west towards the Application Site from the junction of Stag Way and Funtley Road. Views of mature trees and boundary vegetation along the northern Site boundary dominate this view and form a green corridor along Funtley Road. Views of the existing access road and entrance gate within the Application Site are apparent. Views of the ground plane within the Application Site are, however, truncated by the intervening vegetation.



**Photograph – Viewpoint 8**  
View looking south west towards the Application Site from Funtley Road. Views of mature boundary vegetation and tree planting along the northern boundary of the Application Site dominate this view and form a green corridor along Funtley Road. Views of the internal ground plane of the Application Site are in turn truncated due to intervening boundary vegetation.



**Photograph – Viewpoint 9**  
View looking south west towards the Application Site from Footpath 88. Open views of arable land dominate the foreground. The existing settlement of Funtley is evident in the distance with the topography rising sharply towards the ridgeline to the south west. Partial views of the mature vegetation along the southern boundary of the Application Site are evident. Glimpsed views of small sections of existing pasture grassland and the roof section of the existing built form within the southern section of the Application Site are also apparent in the far distance. Views of other parts within the Application Site are truncated due to intervening vegetation and landform.



**Photograph – Viewpoint 10**  
View looking west towards the Application Site from Footpath 89. Open views of grassland dominates this view with mature trees and vegetation that define localised field boundaries in the middle distance. Glimpsed views of the top section of an existing mobile communication mast helps to identify the location of the Application Site in the wider landscape. Due to intervening vegetation and landform, views of the Application Site are truncated from this location.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area

Winter Views



**Photograph** – Viewpoint 7 Winter View  
There is slightly increased visibility into the Site in winter.



**Photograph** – Viewpoint 8 Winter View  
There are glimpses of the ground plane of the Site in winter without leaf cover.



**Photograph** – Viewpoint 9 Winter View  
There is slightly increased visibility of the south-eastern part of the Site in winter - existing vegetation (including Great Beamond Coppice), small part of the ground plane, southern barns and telecommunications mast. Existing built form at Funtley is also more apparent.



**Photograph** – Viewpoint 10 Winter View  
There is very slightly increased visibility of the south-eastern part of the Site in winter, the existing vegetation, southern barns and telecommunications mast. Existing built form at Funtley is also more apparent.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area  
Summer Views



**Photograph – Viewpoint 11**  
View looking east towards the Application Site from Footpath 83a near a group of Listed Buildings (Ironmaster’s House and Funtley House) and the Scheduled Monument (Site of Funtley Iron Works). Views of pasture land with existing mature boundary vegetation dominate the foreground of this view. Views of the Application Site are truncated due to intervening vegetation and land form.



**Photograph – Viewpoint 12**  
View looking east towards the Application Site from the southern section of Bridleway 515. Views of existing mature trees and vegetation dominate this view and form a green corridor along the footpath. Due to intervening vegetation, views of the Application Site are truncated from this location.



**Photograph – Viewpoint 13**  
View looking south east towards the Application Site from footpath 16. Views of pasture land dominate the foreground with topography gently falling to meet the River Meon in the distance. Views of the existing tree belt along Mayles Lane and River Lane are apparent in the distance and obscure any views of the Application Site from this location.



**Photograph – Viewpoint 14**  
View looking south towards the Application Site from the northern section of Bridleway 515. Views of existing mature trees and vegetation dominate this view and form a green corridor along the footpath. Due to intervening vegetation, views of the Application Site are truncated.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area

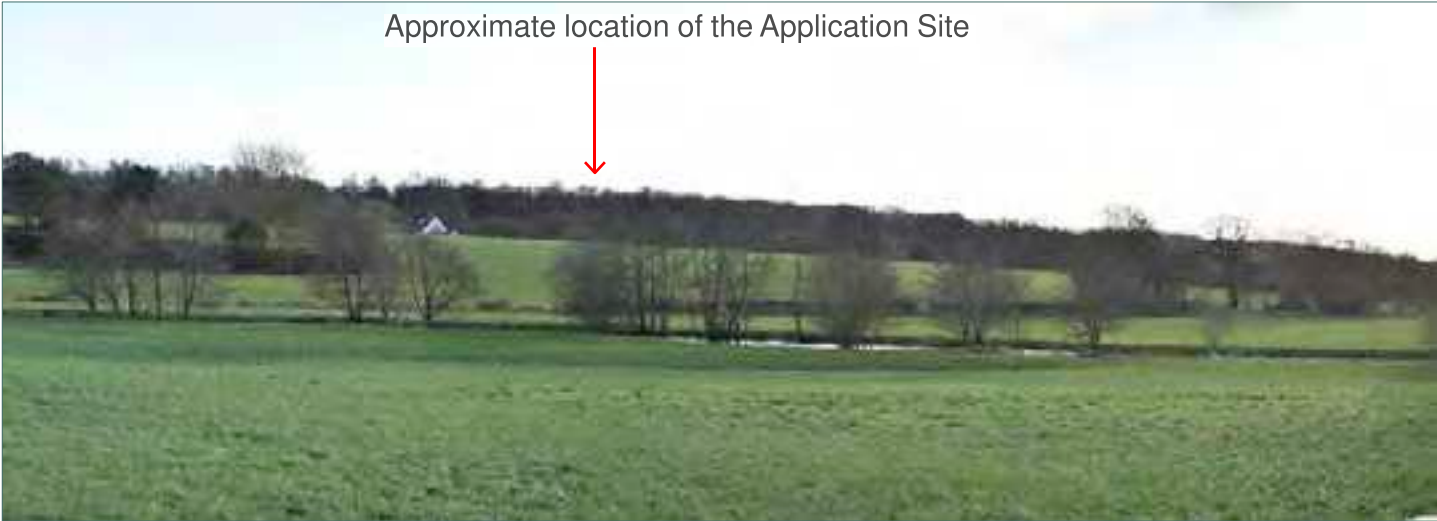
Winter Views



**Photograph – Viewpoint 11 Winter View**  
There are no views towards the Site in winter.



**Photograph – Viewpoint 12 Winter View**  
There are no views towards the Site in winter.



**Photograph – Viewpoint 13 Winter View**  
There are no views towards the Site in winter. From a short section of Titchfield Lane just south-east of this viewpoint, there is a brief glimpse of the upper part of the telecommunications mast on the southern part of the Site, however, the Site and vegetation within it remains fully truncated from view due to the disused railway line and mature vegetation along it.



**Photograph – Viewpoint 14 Winter View**  
There are no views towards the Site in winter.



3. Visual Baseline Conditions and Sensitivities

3.3 Visual Appraisal from the Local Area  
Additional Winter Views



**Photograph** – Viewpoint 12A Additional Winter View  
Winter view located near to the bridge crossing over Funtley Road. There are glimpses into the north-western part of the Site and of part of Great Beamond Coppice. Funtley Road and existing dwellings within the village are also glimpsed beyond vegetation along the disused railway line / Bridleway 515.



**Photograph** – Viewpoint 14A Additional Winter View  
Winter view located near to the bridge crossing over Funtley Road. There are glimpses into the westerns part of the Site. Existing dwellings within the village are also glimpsed beyond vegetation along the disused railway line / Bridleway 515.



3. Visual Baseline Conditions and Sensitivities

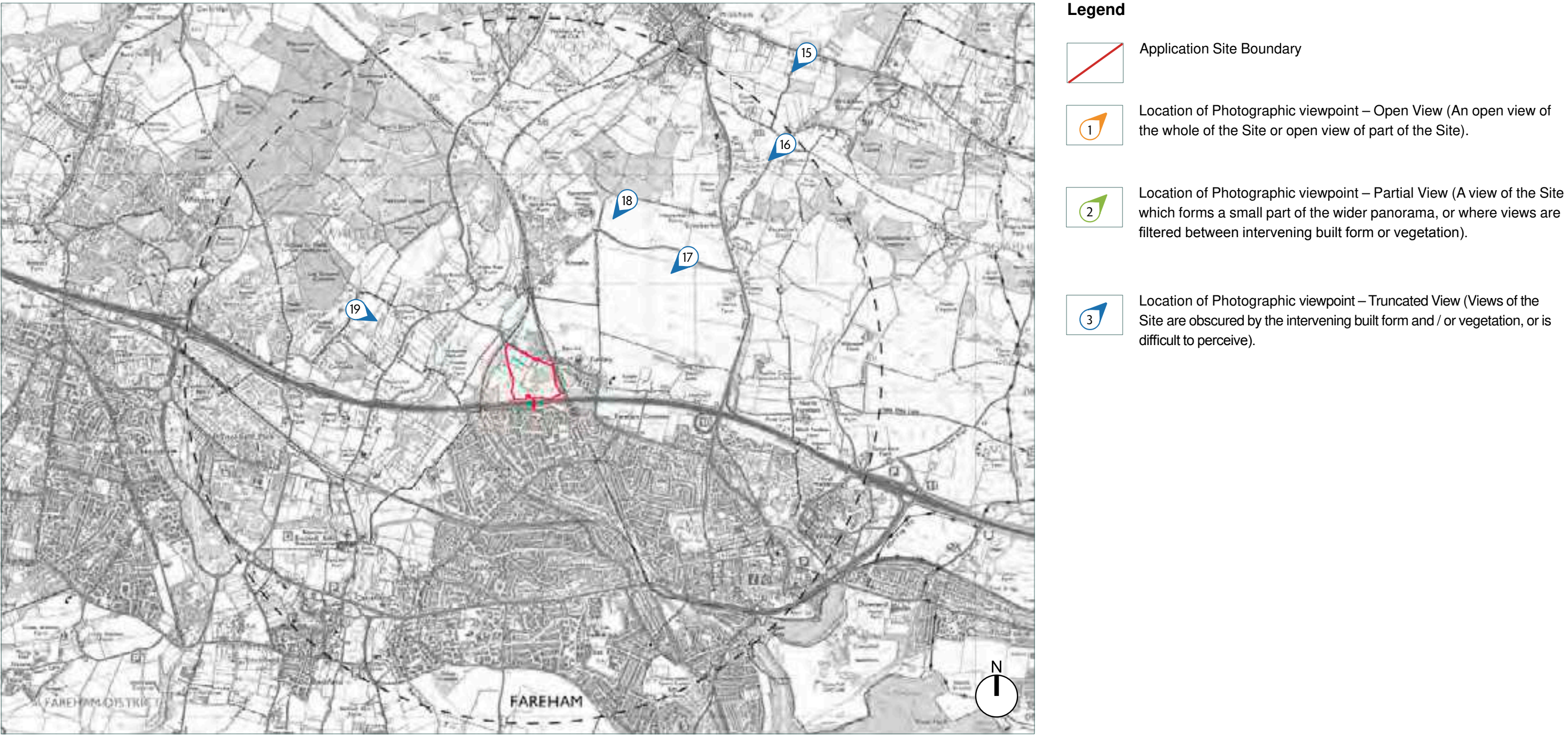


Figure 3.3 – Location Plan showing Visual Summary from the wider area (fabrik, 2018)



3. Visual Baseline Conditions and Sensitivities

3.4 Visual Appraisal from the Wider Study Area

Summer Views



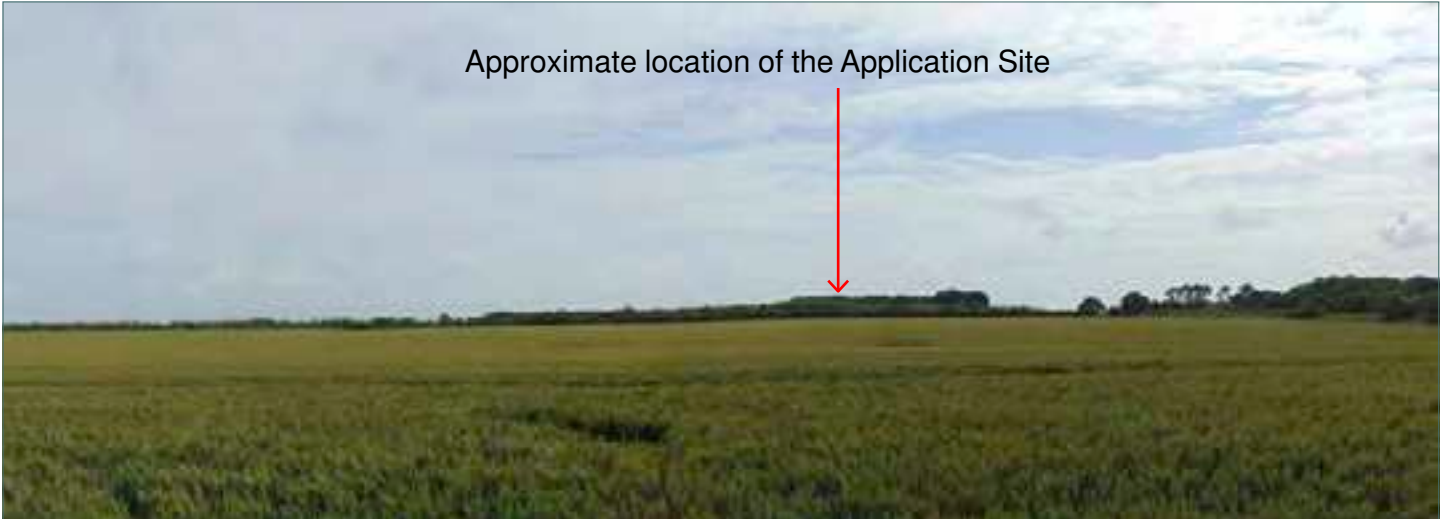
**Photograph – Viewpoint 15**  
View looking south west towards the Application Site from Footpath 11 adjacent to Wickham Road (southern boundary of South Downs National Park). Views of existing mature vegetation along either side of the footpath dominates this view and obscures any views towards the Application Site from this location.



**Photograph – Viewpoint 16**  
View looking south west towards the Application Site from the junction of Footpath 10 (Castle Farm Lane) and Forest Lane. Mature trees and vegetation along the lane dominate this view and create a green corridor along the lane. Views of the Application Site are wholly truncated by the intervening vegetation and topography.



**Photograph – Viewpoint 17**  
View looking south west towards the Application Site from the cycle and footpath along the eastern section of Knowle Road. The cycle / footpath is apparent centrally within this view with mature hedgerows and vegetation evident on either side of the path. Due to intervening vegetation, views of the Application Site are wholly truncated from this location.



**Photograph – Viewpoint 18**  
View looking south west towards the Application Site from Footpath 23b located along the southern part of Aylesbury Copse. Views of arable fields dominate this view with topography gently sloping towards the west. The existing tree belt to the south of Knowle Road is apparent in the distance from this location. Any views of the Application Site are truncated due to intervening topography and vegetation.



### 3. Visual Baseline Conditions and Sensitivities

#### 3.4 Visual Appraisal from the Wider Study Area

##### Summer Views



**Photograph – Viewpoint 19**

View looking south east towards the Application Site from Bridleway 26b located in close proximity to a barn 20 metres south of Lee Ground (Grade II Listed Building) and Skylark Golf and Country Club. Mature trees and vegetation define the localised field boundaries and create a green corridor along the bridleway. Views of the Application Site are wholly truncated by the intervening vegetation and land form.



## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within the Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
1	Public footpath 85	Residential; Transient receptors on foot and bike and vehicle.	The internal ground plane within the Application Site is truncated from this location. However, the glimpsed view of top section of Great Beamond Coppice along the north-eastern is evident from this location.	View looking south west towards the Application Site from the eastern section of Funtley Lane (Footpath 85). The existing residential built form along Funtley Lane dominates this view with mature hedgerow forming a vegetated edge along this part of the lane. Glimpsed views of the top section of Great Beamond Coppice along the north-eastern edge of the Application Site is apparent. Views of the internal ground plane within the Application Site are truncated.  There is no significant change in the visibility of the Site in winter.	Approximately 20m AOD	Approximately 174m	Medium - Low
2	Existing Open Space	Transient receptors on foot	The internal ground plane and the existing vegetation within the Application Site are truncated from this location.	View looking west towards the Application Site from an informal footpath at the edge of the lake to the south west of Lakeside (south of Funtley Road). Mature trees and vegetation dominate this view and forms a green corridor along the path. The intervening vegetation, which includes that alongside the live railway (right, truncates any views of the internal ground plane within the Application Site from this location.  There is no significant change in the visibility of the Site in winter.	Approximately 20m AOD	Approximately 122m	Medium
3	Area Outside of Defined Urban Settlement Boundary	Transient receptors on foot	The internal ground plane within the Application Site is truncated from this location. However, partial views of the existing tree and vegetation across the southern section of the Application Site are evident from this location.	View looking north towards the Application Site from the footbridge to the south of the Application Site over the M27. The footbridge and the mature tree belt planted along the motorway edge dominates this view. Partial views of the existing mature trees and vegetation along the southern Application Site are evident behind the existing vegetation that lines the motorway. Views into other areas across the Application Site are truncated by the intervening vegetation and topography from this location.  There is no significant change in the visibility of the Site in winter.	Approximately 50m AOD	Approximately 285m	Medium - Low

## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within the Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
4	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot and vehicle.	Open views of existing vegetation and built form within the Application Site occur from this location.  Open views of existing boundary vegetation, built form and ground plane of the Application Site are visible from this location	View looking east towards the Application Site from the existing hardstanding area associated with the private dwelling 'Bramleigh' located on Honey Lane. The existing boundary vegetation and pasture grassland within the Application Site dominates the view. Open view of the internal plane, boundary vegetation and the Great Beamond Coppice are apparent from this location.  For the winter view see Site Internal Viewpoint 13A, which is taken from the Site-side of the hedge at the boundary with the property. Existing built form at Funtley and further north of the village is visible beyond the Site. Existing outbuildings and part of Great Beamond Coppice are visible to the right in the photo.	Approximately 35m AOD	Approximately 176m	Medium
5	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot and bike and vehicle.	Open views of existing boundary vegetation associated the Application Site occur from this location.	View looking south east towards the Application Site from Funtley Road (by properties just east of the disused railway bridge). Views of existing residential built form along Funtley Road dominate the foreground with mature trees and vegetation along the northern Application Site boundary apparent. Views of the internal ground plane within the Site are truncated due to intervening boundary vegetation.  In winter, the ground plane of the Site becomes apparent without leaf cover to the northern boundary vegetation.	Approximately 18m AOD	Approximately 230m	Medium
6	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot and bike and vehicle.	Open views of existing mature tree and vegetation along the northern boundary of the Application Site occur from this location.	View looking south east towards the Application Site from the junction of Roebuck Avenue and Funtley Road. Views of existing residential built form around the entrance of Roebuck Avenue and mature trees and vegetation along the northern Site are apparent. Views of the internal ground plane within the Application Site are truncated due to intervening boundary vegetation.  There is little change in the visibility of the Site in winter.	Approximately 19m AOD	Approximately 22m	Medium

## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within the Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
6b	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot and bike and vehicle.	Open views of central part of internal ground plane within the Application Site occur with mature vegetation evident in the distance.	View looking south east towards the Application Site from Roebuck Avenue. The residential built form with its associated private garden along Roebuck Avenue dominates this view with the topography within the Application Site rising towards the local ridgeline. Open views of the central part within the Application Site occur, funnelled along the road with mature vegetation evident in the distance. Views into other areas within the Application Site are truncated by intervening vegetation, topography and built form from this location.  There is slightly increased visibility of the Site in winter.	Approximately 20m AOD	Approximately 59m	Medium
7	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot, bike and vehicle.	Open views of existing mature tree and vegetation and the entrance access road along northern boundary of the Application Site occur.  A small section of the existing northern boundary vegetation within the Application Site occur, evident in the middle distance.	View looking south west towards the Application Site from the junction of Stag Way and Funtley Road. Views of mature trees and boundary vegetation along the northern Site boundary dominate this view and form a green corridor along Funtley Road. Views of the existing access road and entrance gate within the Application Site are apparent. Views of the ground plane within the Application Site are, however, truncated by the intervening vegetation.  There is slightly increased visibility into the Site in winter.	Approximately 20m AOD	Approximately 8m	Medium
8	Area Outside of Defined Urban Settlement Boundary	Residential; Transient receptors on foot, bike and vehicle.	Open views of existing mature tree and vegetation along north-eastern boundary of the Application Site occur from this location.	View looking south west towards the Application Site from Funtley Road. Views of mature boundary vegetation and tree planting along the northern boundary of the Application Site dominate this view and form a green corridor along Funtley Road. Views of the internal ground plane of the Application Site are in turn truncated due to intervening boundary vegetation.  There are glimpses of the ground plane of the Site in winter without leaf cover.	Approximately 23m AOD	Approximately 60m	Medium

## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
9	Welborne Policy Boundary	Transient receptors on foot.	Glimpsed views of small section of existing pasture grassland and the roof section of the existing built form within southern section of the Application Site occur set within the wider panorama.	<p>View looking south west towards the Application Site from Footpath 88. Open views of arable land dominate the foreground. The existing settlement of Funtley is evident in the distance with the topography rising sharply towards the ridgeline to the south west. Partial views of the mature vegetation along the southern boundary of the Application Site are evident. Glimpsed views of small sections of existing pasture grassland and the roof section of the existing built form within the southern section of the Application Site are also apparent in the far distance. Views of other parts within the Application Site are truncated due to intervening vegetation and landform</p> <p>There is slightly increased visibility of the south-eastern part of the Site in winter - existing vegetation (including Great Beamond Coppice), small part of the ground plane, southern barns and telecommunications mast. Existing built form at Funtley is also more apparent.</p>	Approximately 23m AOD	Approximately 940m	Medium
10	Welborne Policy Boundary	Transient receptors on foot.	Glimpsed views of the top section of existing mobile mast adjacent to southern boundary of the Application Site occur with existing mature boundary vegetation evident, set within the wider panorama.	<p>View looking west towards the Application Site from Footpath 89. Open views of grassland dominates this view with mature trees and vegetation that define localised field boundaries in the middle distance. Glimpsed views of the top section of an existing mobile communication mast helps to identify the location of the Application Site in the wider landscape. Due to intervening vegetation and landform, views of the Application Site are truncated from this location.</p> <p>In winter, there is very slightly increased visibility of the south-eastern part of the Site in winter, the existing vegetation, southern barns and telecommunications mast. Existing built form at Funtley is also more apparent.</p>	Approximately 840m AOD	Approximately 15m	High

3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors							
Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
11	Area Outside of Defined Urban Settlement Boundary; Strategic Gap	Transient receptors on foot, bike and vehicle.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	<p>View looking east towards the Application Site from Footpath 83a near a group of Listed Buildings (Ironmaster’s House and Funtley House) and the Scheduled Monument (Site of Funtley Iron Works). Views of pasture land with existing mature boundary vegetation dominate the foreground of this view. Views of the Application Site are truncated due to intervening vegetation and land form. .</p> <p>There are no views towards the Site in winter.</p>	Approximately 15m AOD	Approximately 540m	High
12 and 12A	Existing Open Space	Transient receptors on foot.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	<p>View looking east towards the Application Site from the southern section of Bridleway 515. Views of existing mature trees and vegetation dominate this view and form a green corridor along the footpath. Due to intervening vegetation, views of the Application Site are truncated from this location, including in winter.</p> <p>From 12A (winter view) located near to the bridge crossing over Funtley Road, there are glimpses into the north-western part of the Site and of part of Great Beamond Coppice. Funtley Road and existing dwellings within the village are also glimpsed beyond vegetation along the disused railway line / Bridleway 515.</p>	Approximately 30m AOD	Approximately 240m	High



## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
13	Outside of Fareham Borough Council's local policy boundary	Transient receptors on foot.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	<p>View looking south east towards the Application Site from footpath 16. Views of pasture land dominate the foreground with topography gently falling to meet the River Meon in the distance. Views of the existing tree belt along Mayles Lane and River Lane are apparent in the distance and obscure any views of the Application Site from this location..</p> <p>There are no views towards the Site in winter. From a short section of Titchfield Lane just south-east of this viewpoint, there is a brief glimpse of the upper part of the telecommunications mast on the southern part of the Site, however, the Site and vegetation within it remains fully truncated from view due to the disused railway line and mature vegetation along it.</p>	Approximately 15m AOD	Approximately 745m	High
14 and 14A	Existing Open Space; Public bridleway 515	Transient receptors on foot.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	<p>View looking south towards the Application Site from the northern section of Bridleway 515. Views of existing mature trees and vegetation dominate this view and form a green corridor along the footpath. Due to intervening vegetation, views of the Application Site are truncated, including in winter.</p> <p>From 14A (winter view) located near to the bridge crossing over Funtley Road, there are glimpses into the westerns part of the Site. Existing dwellings within the village are also glimpsed beyond vegetation along the disused railway line / Bridleway 515.</p>	Approximately 25m AOD	Approximately 488m	High
15	Outside of Fareham Borough Council's local boundary, but is adjacent southern boundary of South Downs National (along Wickham Road )	Transient receptors on foot and bike and vehicle.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	View looking south west towards the Application Site from Footpath 11 adjacent to Wickham Road (southern boundary of South Downs National Park). Views of existing mature vegetation along either side of the footpath dominates this view and obscures any views towards the Application Site from this location.	Approximately 45m AOD	Approximately 3.74km m	Medium - High

## 3. Visual Baseline Conditions and Sensitivities

Table 3.1 – Summary of Visual Receptors

Representative Visual Receptor Viewpoint No.	Landscape Designation	Receptors	Extent of the land visible within Application Site	Character and Amenity of the View	Elevation	Distance to Site	Value
16	Area Outside of Defined Urban Settlement Boundary; Public footpath 10	Transient receptors on foot and bike and vehicle.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	View looking south west towards the Application Site from the junction of Footpath 10 (Castle Farm Lane) and Forest Lane. Mature trees and vegetation along the lane dominate this view and create a green corridor along the lane. Views of the Application Site are wholly truncated by the intervening vegetation and topography.	Approximately 55m AOD	Approximately 3km	Medium - High
17	Welborne Policy Boundary	Transient receptors on foot and bike.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	View looking south west towards the Application Site from the cycle and footpath along the eastern section of Knowle Road. The cycle / footpath is apparent centrally within this view with mature hedgerows and vegetation evident on either side of the path. Due to intervening vegetation, views of the Application Site are wholly truncated from this location.	Approximately 45m AOD	Approximately 1.62km	Medium
18	Welborne Policy Boundary	Transient receptors on foot.	Views of the internal ground plane and the existing vegetation within the Application Site truncated from this location.	View looking south west towards the Application Site from Footpath 23b located along the southern part of Aylesbury Copse. Views of arable fields dominate this view with topography gently sloping towards the west. The existing tree belt to the south of Knowle Road is apparent in the distance from this location. Any views of the Application Site are truncated due to intervening topography and vegetation.	Approximately 42m AOD	Approximately 1.74km	Medium - High
19	Public bridleway 26b; in close proximity of Barn 20m south of Lee Ground (Grade II Listed Building) and Skylark Golf & Country Club	Transient receptors on foot and horseback.	Views of the internal ground plane and the existing vegetation within the Application Site are truncated from this location.	View looking south east towards the Application Site from Bridleway 26b located in close proximity to a barn 20 metres south of Lee Ground (Grade II Listed Building) and Skylark Golf and Country Club. Mature trees and vegetation define the localised field boundaries and create a green corridor along the bridleway. Views of the Application Site are wholly truncated by the intervening vegetation and land form.	Approximately 35m AOD	Approximately 1.72km	Medium - High

## 4. Landscape Constraints and Opportunities

### 4.1 Introduction

The following landscape elements form a series of constraints and opportunities that will inform future development proposals:

### 4.2 Constraints

- The Ancient Woodland is to be retained and protected by a 15m buffer, with no development within this zone.
- Existing tree groups designed as SINC and TPO within the Site are to be retained and protected.
- Retention of the majority of the existing hedgerows along the ownership boundaries, with limited removal required to facilitate safe access into and out of the Site.
- The rooting zones and canopies of existing trees and hedges to be retained would be protected during construction works in accordance with the recommendations of the project arboriculturist and ecologist.
- While land within north-eastern part of the Site is designated as open space within the Core Strategy (adopted August 2011) in fact this is privately owned pasture land used for horse keeping and is not currently accessible to the public. The area is also proposed for deletion in the emerging local plan. The proposed development explores options to relocate this elsewhere within the Site, so that development within this less sensitive location near to the road and existing settlement may be developed.
- The existing topography within the northern section of the ownership is gently sloping towards Funtley Road. However, the undulating topography then rises sharply from the central part of the Site to meet the southern western boundary, and then falls again towards the south-eastern boundary. This restricts development to the area of land in the vicinity of Funtley Road.
- Timber pylons carrying overhead wires within the north-western part of the Site may be undergrounded where practicable.

- Due to the existing land form and close proximity to the neighbouring residential built form, there are a number of open views of the boundary vegetation, or views of the internal ground plane within the Site evident from neighbouring houses and the transient receptors in vehicles / on foot using Funtley Road and Honey Lane.

### 4.3 Opportunities

- Existing access into the Site (opposite Stag Way) to be retained and enhanced for vehicular and pedestrian access into the future development parcels.
- Bus route along Funtley Road passing by the Site.
- Large mature trees surrounding and within the Site present an opportunity to create a mature, well-established green structure.
- The potential to create green buffers with the opportunity for additional tree planting around future development parcels to provide an improved green settlement edge.
- To create a positive interface with the landscape where development parcels front the green infrastructure.
- Potential to create areas of public open space with pedestrian links within the development and to the wider landscape beyond. This may include opening up access to the bridge crossing over the M27.
- Potential to create a well-designed, discrete and accessible urban extension to Funtley and Fareham, rounding off the settlement, which is well contained by the existing boundary vegetation and topography of the Site.
- Land within the Site historically subject to excavation has been since reinstated back to agricultural use (as discussed in section 2.10). Therefore this land does not pose a constraint to development in terms of further excavation.



4. Landscape Constraints and Opportunities



## 5. Illustrative Proposed Development Parameters

### 5.1 Landscape Development Parameters

The landscape development parameters illustrated on **Figure 5.1** have been prepared by considering the landscape features of the Site and other areas within the Site along with landscape policy, landscape character and the visual constraints associated with the local landscape.

The parameters therefore seek to:

- Locate the development parcels on the lower slopes of the Site to the north to minimise cut and fill as well as in-keeping within the local residential character of Funtley and the northern fringe of Fareham.
- Minimise the visual impact of the future development by providing landscape buffer planting along the development boundaries.
- Maintain and enhance the existing landscape features of the Site by retaining, where possible, existing trees and supplementing with additional trees, woodland and hedgerow planting.
- Make use of the existing access to the Site for access to the proposed development, and provide replacement and enhancement planting within this area. A secondary emergency access from Funtley Road may also be required to the north-west of this.
- Where appropriate, contribute to an improved ecological value of the Site through the incorporation of native species within the landscape planting and grassland proposals.
- Make use of any sustainable drainage features to integrate a more diverse range of plant species, suited to temporary flooding.
- Provide public open space within the development and to the south. Incorporate pedestrian links to serve the new residents and the wider community within Funtley and Fareham. This would provide an alternative option to the existing designated open space within the north-western part of the Site (Core Strategy 2011). Pedestrian links may extend to the south through the opening up of the M27 footbridge.



5. Illustrative Proposed Development Parameters



6. Appraisal of Landscape and Visual Effects

6.1 Effects on Heritage Assets

The Site does not contain nor is adjacent to any heritage assets (such as Listed Building, Scheduled Ancient Monument and Conservation Areas). Therefore, there will be no change to the character of the landscape around these assets, and no views towards the proposed development are predicted from them (**neutral** effect).

6.2 Effects on Topography

Study area topography:

There will be no physical change to the existing topography across the wider study area since the changes will occur at Site and immediate Site level only.

The value is low - medium; susceptibility is low; and sensitivity is low. The magnitude of change would be neutral. Therefore the effect on the topography at the study area level is **neutral**.

Site topography:

The proposed development parcels have been carefully located on the lower slopes within northern part of the Site. Some limited regrading where the Site meets the public highway may be required to facilitate ease of access for all. There may be some localised modifications to the existing landform within the proposed development parcels, to facilitate access and to form effective development platforms. In addition, localised excavations would be made to create sustainable drainage features. It is expected that suitable excavated material would be retained on Site and reused in the open spaces where grassed areas and planting are proposed. Care would be taken to avoid impacts on the rooting zones of existing vegetation. Any inert spoil excavated may be suitable for reuse within areas of proposed hardstanding, subject to confirmation by the project engineer.

The value is medium; susceptibility is low - medium; and sensitivity is low - medium. The magnitude of change would be low - medium. Therefore, the effects on this receptor is likely to result in **minor - moderate** adverse effects at the construction phase. Since no

further earthworks would occur beyond the construction stage, the operational phase effects on the Site topography would be **neutral**.

6.3 Effects on Land Use

Study area land use:

*Farmland*

At wider landscape level, there will be no direct change to the wider arable and pasture lands across the study area as the proposed changed to the existing land use will occur at Site level only. Furthermore, existing areas of farmland are largely separated from the Site by existing settlement, the existing and disused railway lines and mature vegetation.

During construction, there may be some views of construction plant / structures from elevated areas of private farmland north of Funtley, up to Knowle village (indirect effect). During operation, there may be some partial views of the upper elements of the built form (namely rooflines) from this private farmland, seen in context with existing built form within the valley through which Funtley Road passes. Any views of open and planted land south of the proposed development would remain. This is also an indirect effect and no direct changes to these farmed areas would occur.

*Settlement and transport corridors*

The Site forms a context and setting to a small part of the existing Funtley village and a short section of Funtley Road. This would change through the introduction of built development within the northern part of the Site. This would result in a limited change to the settlement pattern and character of the road corridor by extending built form to the south of Funtley Road. A broad context of open, unbuilt land would remain to the south of the proposed built area. In addition, longer views towards the elevated land within the southern parts of the Site from existing built areas and of the canopy of mature trees and woodland in these parts of the Site, are likely to be maintained. The road corridor would become more enclosed by built form, albeit this is proposed to be set well back from the existing Site boundary hedge, incorporating open space, sustainable drainage

features and additional planting.

The settlement pattern of Fareham would remain unchanged, and there would be no change to the pattern of roads around the Site or wider study area.

*Open spaces*

There would also be no physical change to existing open spaces across the study area, including that at Lakeside to the east of the Site.

*Appraisal of study area land use effects*

The value of the land use at study area level is low - medium; susceptibility is low; and sensitivity is low - medium. The magnitude of change would be low - medium, with the greatest level of change experienced by those land uses within very close proximity to the Site (Funtley Road and a part of Funtley village). A number of areas would experience no change (Fareham and rural landscapes east and west of the Site). Limited indirect visual change may be experienced from farmland further north of Funtley up to Knowle village. Therefore, the effect on land use at the study area level would be at worst, **minor** negative, with the effects being very localised to the Site.

The many areas of mitigation planting associated with the proposed development would reduce the effects to at worst **minor** negative to **neutral** in the long term (year 15). Other positive benefits are predicted through the creation of new public open spaces that would be accessible to both existing and new residents.

There would therefore be a **neutral** effect to the settlement pattern of Fareham, existing open spaces and the existing transportation network.



## 6. Appraisal of Landscape and Visual Effects

### 6.3 Effects on Land Use (continued)

#### Site land use:

The areas within the Site would be permanently changed from privately owned pasture land to a residential development. The new uses would include associated green infrastructure incorporating, retained vegetation and woodland; new trees and boundary buffer planting; planting throughout the built areas; sustainable drainage features and a series green, open spaces within the built area and to the south of it.

The Site lies entirely within the landscape designation of Area Outside Of Defined Urban Settlement within the Core Strategy (adopted August 2011) and a part of the Site to the north-west is designated as existing open space within the Core Strategy. The latter is not currently accessible to the public and the land is within private ownership for equestrian uses.

The changes to incorporate a built development and new publicly accessible open spaces within these areas is consistent with Local Plan Part 2 Policy DSP40 Housing Allocations, and with emerging the emerging Local Plan 2036, which allocates the Site for residential development. In addition, the supporting Landscape Assessment update (part of the evidence base to the Plan) indicates that small scale and sensitively integrated development may be appropriate in this location, given the existing residential areas of Funtley Road.

At enabling construction stage, the existing uses of the Site would change, particularly in the areas proposed for built development and new access. However, change would be limited within the proposed open spaces of the community park to the south, except for the creation of new paths, and implementation of green infrastructure such as sustainable drainage, new grasslands and planting.

The construction site would gradually change to a built development, with associated landscape planting. The built element, while wholly changing land use, would only occur in a part of the Site to the north. The proposed community park would retain a largely open character to land to the south, and would incorporate new paths for walkers. This park, together with further linear greenspaces and an open

space incorporating play features, would be provide facilities for use by new and existing residents.

The value of the land use at Site level is medium; the susceptibility is medium - high; and sensitivity is medium - high. The magnitude of change would be medium - high at the enabling, construction and early years operational stages. Therefore, as with any greenfield site, the level of effects would be **moderate - major** negative, arising principally from the introduction of built form to the paddocks. In addition, the provision of publicly accessible open spaces would result in a **minor - moderate** positive effect from completion of development (Year 1).

By Year 15, mitigation planting would further temper the effects on the Site land use, so that at worst, **minor** negative effects are predicted. The positive effects of the open spaces would remain, while the many new areas of planting within the Site, and management of existing vegetation are also expected to give rise to positive effects (see para. 6.4).

### 6.4 Effects on Existing Vegetation

#### Study area vegetation:

There are expected to be no physical changes to the existing vegetation across the wider study area since the changes are proposed at Site level only. Existing vegetation along the north side of Funtley Road is not expected to be affected by the provision of new access into the Site.

The value is low - medium; susceptibility is low; and sensitivity is low. The magnitude of change would be neutral. Therefore the effect on the vegetation at the study area level is **neutral**.

#### Site vegetation:

The Great Beamond Coppice, the existing tree groups near the existing access entrance and the tree blocks within the south-western part of the Site are designated as Sites of Importance for Nature Conservation in the Core Strategy. The mature vegetation and trees within these areas are to be retained and protected during

the construction works, with careful consideration given to the recommendations of the project ecologist and arboriculturist.

The proposed development would protect and retain the Ancient Replanted Woodland of Great Beamond Coppice and majority of mature trees and boundary vegetation within the Site. A 15m buffer would be retained to the Coppice.

There is expected to be some loss of existing trees and boundary vegetation within the Site to accommodate the proposed development parcels and access roads. A part of this includes dense, ornamental conifers of limited value to landscape character. Further arboricultural works may be undertaken to other vegetation within the wider Site area, if deemed necessary by the relevant professional for health and safety reasons, to remove any dead, dying, diseased or dangerous parts of the retained vegetation.

The value of the vegetation at Site level is medium; susceptibility is medium; and sensitivity is medium. The magnitude of change arising from the limited necessary vegetation loss at enabling / construction stage is predicted to be medium, giving rise to at worst, **moderate** negative effects. However these effects would be localised to the northern part of the Site where built form is proposed.

Effects on the majority of the vegetation within the Site are expected to be **neutral** or potentially positive, where management of vegetation would ensure its retention and longevity.

There is ample opportunity within and around the proposed built area and proposed community park, for replacement and additional tree, hedge, shrub and other planting, including landscape buffer planting, making use of species appropriate to the space, position and function. This would mitigate for and improve, the visual and landscape effects of the vegetation removal required to facilitate effective development.

Further details are set out in the Design and Access Statement (DAS) accompanying the planning application.

6. Appraisal of Landscape and Visual Effects

6.4 Effects on Existing Vegetation (continued)

The planting would be implemented during the construction stage with the effects in place by Year 1 of the operational stage. The low magnitude of change would give rise to **minor** positive effects. The positive effects of this planting on the landscape assets of the Site, and views within and towards the built area, would further increase over time, as this matures. The effect on the Site vegetation by Year 15 would therefore be **moderate** positive.

6.5 Effects on Public Rights of Way

Study area public rights of way:

There would be no physical change to the existing public rights of way network during construction or operation. Visual effects are considered separately.

The value is medium - high; susceptibility is low; and sensitivity is medium. The magnitude of change would be neutral. Therefore the effect on the topography at the study area level during construction and operation is **neutral**.

There are opportunities to provide pedestrian connections between the proposed development and existing Bridleway 515 (along the disused railway line) to the immediate west. It may also be possible to open up a connection to Fareham via the footbridge over the M27 to the immediate south of the Site. This in turn could facilitate access by existing residents in this location to the open space and rights of way network north of the motorway.

As such, at the operational stage, the magnitude of change is predicted to be low, with effects the effects being **minor - moderate** positive in Years 1 and 15.

6.6 Effects on Landscape Character

National and county landscape character:

There would be **negligible** effects to the landscape character at national character level (NCA128 South Hampshire Lowlands) and county character level (LCA 3E Meon Valley). This is because the limited scale of the proposed development, and relatively high level of physical and visual enclosure of the Site, would result in changes that occur principally at the Site, and immediate local level.

There would be no change to the Portsdown Hill chalk ridge or Meon River described at NCA level, and the proposed development would form a very small part of NCA128 that is described as being dominated by large towns and with fragmentation by major transport links including the M27.

At county level, the proposed development would not affect the recreational route along the disused railway line to the west, and would retain a significant area of unbuilt land to the south, separating it from the motorway and Fareham settlement. Vegetation within the Site would be retained and protected as far as is practicable and potential adverse effects on the SINC's and Ancient Replanted woodland within the Site have been designed out of the development proposals.

The value of the national and district character varies from low - high; susceptibility is low; and sensitivity is low - medium. The magnitude of change would be negligible, and therefore the effects would be **negligible**.

Borough and Site landscape character:

At Fareham Borough level, the Site lies within LCA 6: Meon Valley. While the Site comprises of pasture land, it is nonetheless subject to the nearby influences of relatively recent built form at Funtley, the live railway to the east and M27 and Fareham urban fringe to the south. The proposed development would form a limited addition to this existing built context.

The proposed development is set out to closely follow the parameters for the Site allocation set out in the emerging Local Plan. Thus, there would be built form in the northerly, lower lying and more level parts of the Site, forming a limited extension to the existing Funtley village. Like the existing residential development north of Funtley Road, development would be set back to allow a leafy green and spacious character to be retained along the road. Development is not proposed on the steep slopes or high ground of the Site.

In accordance with the LCA, the proposal protects the important landscape features of the Site - the steeply sloping landforms, unbuilt skyline, mature vegetation and openness to the south; while proposing to integrate many new areas of planting, including in association with new sustainable drainage features.

Development would, like the existing village, be kept to the relatively low lying part of the valley within which it lies, limiting the potential for widespread visual effects.

The proposed built form would respond to the positive aspects of existing built form both north of Funtley village and within the wider settled areas. A generous network of green infrastructure and open spaces are proposed. Further details are set out in the DAS accompanying the planning application.

The value of the borough character varies from low - medium; susceptibility is medium; and sensitivity is low - medium. The magnitude of change would be medium - high at the Site level only, reducing to negligible - low with distance across LCA6 from the Site. Therefore, the effects would be at worst, **moderate - major** negative for the parts of the Site proposed for built development at the construction and operational stage (Year 1). This is due to the change in character from semi-enclosed pasture fields to a residential development.

The changes beyond the proposed built area, would be at worst, **minor - moderate** negative (Year 1) for those areas immediately around the proposed built area - the existing village to the north and open land retained to the south - due to changes to the context and setting of these areas.

## 6. Appraisal of Landscape and Visual Effects

### 6.6 Effects on Landscape Character (continued)

However, further afield, the effects would be at worst, **minor** or **negligible**, due to the physical and visual separation of the Site from most of the area of Fareham borough LCA 6: Meon Valley.

As the planting associated with the green infrastructure areas matures through time, the landscape and visual effects would improve, so that at Site level, these are expected to be no greater than **minor** negative (on a clear day in winter) and at best, **minor** - **moderate** positive (Year 15) due to the additional physical enclosure, landscape integration and visual softening and screening provided by the proposed planting. In turn, the effects on the parts of the character area surrounding the Site would also be further tempered in the medium to long terms.

### 6.7 Effects on Visual Receptors

#### Residential Receptors

The residential receptors that will experience the most direct and proximate views of the construction site and emerging built development would be occupants of the few dwellings to the north side of Funtley Road, just east of the railway Bridge (Viewpoint 5).

Some additional residents along the north side of Funtley Road would also experience direct views, albeit with filtering of views through tall vegetation along both sides of Funtley Road - see Viewpoints 6, S13A, and winter views S3 and 7. This vegetation becomes more of a screen in summer views (with leaf cover). However, parts of this may require removal to facilitate access into the Site from Funtley Road and the built development, which in turn, may further increase visibility into the Site in the short term.

Further visual receptors along Roebuck Avenue and Stag Way may experience some partial and oblique views of the construction site and emerging built form where the roads themselves allow visibility toward parts of the Site - see Viewpoints 6b and 7 (winter view). The

Site boundary vegetation provides a greater level of visual screening to some views in summer. As above, some loss of vegetation may be required to facilitate access into the Site and the development itself, which may further increase visibility into the Site in the short term.

In all of these views, construction hoardings may partially obscure views.

There would also be oblique and more distant views of the construction site and emerging built development from the property (Bramleigh) at the south end of Honey Lane, due to its position on elevated ground and the relatively low level hedge at the boundary with the Site (Viewpoints S5, S6 and S13A, and summer Viewpoint 4). The views would be in context with existing views towards built form north of Funtley Road. While built form would be brought forward in the view, existing longer distance views towards the lower Downs, part of Knowle village and other built areas to the north of Funtley would be largely retained.

The completed development and newly implemented planting would create a new element in these views, replacing part of existing views of pasture fields. The areas of the Site remaining unbuilt would appear as a park with new areas of planting.

The value of the residential receptors is medium; susceptibility is medium - high; and sensitivity is medium - high. The magnitude of change at the construction and Year 1 operational stage would be medium - high, and therefore the effects would be at worst, **moderate** - **major** negative (Year 1), for the relatively limited number of residents with potential views towards the proposed development. The many areas of mitigation planting would contribute to some visual softening of the built areas in the early years. However in the mid to long terms this is predicted to create a significant amount of visual softening and screening, and therefore a bettering of the visual effects. Thus by Year 15, the effects are predicted to reduce to at worst, **minor** negative (the greater effects being on a clear day in winter).

Views from the dwelling at the south end of Honey Lane would retain long views out to the distant countryside to the north, albeit beyond additional areas of built form and planting within the valley. Views from dwellings to the north side of Funtley Road are likely to retain some partial views of the higher, southern parts of the Site, as a backcloth to the built form in the foreground.

#### Receptors using Roads

The views would be very similar to those described for the residential receptors above, and therefore includes parts of Funtley Road, Honey Lane, Roebuck Avenue and Stag Way (see Viewpoints 4-7, 8 and S13A). In all cases, the views would be transitory and Site hoardings may partly screen views.

Views from the western part of Funtley Road are likely to be more open due to the more limited nature of existing vegetation here, albeit the necessary vegetation removal to facilitate access and development to the east may also increase visibility into the Site in the short term.

Views from Honey Lane are rather more limited by existing vegetation at the boundary with the Site, even in winter. Visibility is mainly from two gaps in this vegetation at the north and south ends of the lane.

The value of the receptors using the roads is low; susceptibility is low; and sensitivity is low. The magnitude of change at the construction and Year 1 operational stage would be medium - high, and therefore the effects would be at worst, **minor** - **moderate** negative (Year 1). The setback of development from the roads edging the Site and landscape buffer planting would contribute to mitigating effects in the short to medium terms. By year 15, the landscape buffers would provide more robust visual softening and screening, reducing the effects to at worst, **minor** negative.



6. Appraisal of Landscape and Visual Effects

6.7 Effects on Visual Receptors (continued)

Receptors using Public Rights of Way and M27 footbridge

There is a slight possibility that users of Public Footpaths 88 and 89 to the east of Funtley (Viewpoints 9 and ) may be aware of tall construction plant within the Site, should this be required to facilitate development. There may also be some awareness of works to provide the proposed community park in the south-eastern part of the Site. Any potential views to the construction site would be distant and form part of a wide panorama that includes parts of Funtley, the telecommunications mast on the Site and pylons carrying overhead wires, as well as farmland and vegetation in the intervening areas. The construction effects are therefore predicted to be **negligible**.

Due to the landform of the Site and vegetation and built form in the intervening areas, no notable views of the proposed development or associated proposed community park are predicted from these two footpaths. The operational effects are therefore predicted to be **neutral**.

From Public Bridleway 515 to the immediate west of the Site, walkers and equestrians in the vicinity of the bridge crossing over Funtley Road are likely to gain glimpsed views of the construction site and emerging built form. Views would be filtered by existing vegetation along the disused railway embankment and less apparent from the section north of Funtley Road than from that to the south - see winter Viewpoints 12A and 14A. By the operational stage, these glimpses would be replaced by a completed development, seen in context with existing partial views through the vegetation of existing dwellings north of Funtley Road.

The value of the receptors using Bridleway 515 is medium; susceptibility is medium; and sensitivity is medium. The magnitude of change at the construction and Year 1 operational stage would be medium, and therefore the effects would be at worst, **moderate** negative (Year 1). The setback of development from the western and

northern edges of the Site and landscape buffer planting here and to the south would contribute to mitigating effects in the short to medium terms. By year 15, the landscape buffers would provide more robust visual softening and screening, reducing the effects to at worst, **minor** negative. In summer, views to the proposed development are likely to be less evident as existing vegetation would reduce visibility towards the Site.

From the bridge crossing over the M27, there is little opportunity for views into the Site and no notable views of the construction phase for the southern community park are proposed. The land proposed for the built development would not be visible either during or following construction. Therefore effects are judged to be **minor** for this receptor.

Discounted Visual Receptors

No views during construction or operation are predicted from the following middle distance and wider area locations as the views are truncated by landform, vegetation and / or built form: Viewpoints 1 and 2 - Funtley Lane and Lakeside; summer Viewpoints 12 and 14 from Bridleway 515, to the west; and more distant Viewpoints 11, 13 and 19 (from the west / north-west) and 15 - 18 (from the north-east). No views towards the Site were identified from the South Downs National Park.

7. Policy Compliance

7.1 Emerging Fareham Local Plan 2036 (Draft Consultation Version)

The proposed development is consistent with the Development Allocation for the Site (Policy HA10), set out in the emerging Fareham Local Plan 2036 (see Figure 2.4). It confines the proposed development to the northern parts of the Site; and creates new public open space in the form of parkland with paths to the south. It respects a 15m buffer to Great Beamond Coppice and protects the majority of the existing vegetation within and bounding the Site. The proposal creates new public open space with play elements in the north, incorporating existing vegetation designated as a SINCL. The proposed open spaces more than compensate for the loss of the existing designated open space land within the Site (which is not currently accessible to the public).

Access is proposed to be taken from Funtley Road, making use of the existing access track into the Site. Green corridors, buffers and spaces are integral to the proposed built and green infrastructure areas. Sustainable drainage features are proposed, potentially contributing to the biodiversity and landscape value of the Site. View corridors would be retained between development blocks, allowing views towards the undeveloped southern slopes from Funtley Road to be retained. In accordance with emerging Policy CF6, the open space provision would more than compensate for the change of use of the existing open space designation with the Site (which is not currently accessible to the public).

A total of 55No dwellings are proposed in accordance with the Site allocation. The built form would respect the positive aspects of existing settlement character, and further details on this, and the proposed landscape mitigation are set out in the DAS. Community facilities and pedestrian and cycle links to surrounding areas to the north, south, west and east are also proposed (Policy D1).

The setbacks of the proposed development from the Site boundaries to the north and west, and proposals for landscape buffers with many new areas of planting here and to the south, would create a significant landscape framework that together with the retained

vegetation would contribute to effective landscape integration of the built areas.

In turn, this planting, as well as planting within the built areas would contribute to meaningful visual softening and partial screening of the development from surrounding built areas, while partial views of the higher, undeveloped slopes of the Site would be retained. This is consistent with the aims of the policy.

The confinement of the proposed built area to the existing, developed valley floor (through which Funtley Road runs) would limit the extent to which the proposals would impact on the character of the Site and wider surrounding landscape (Policies NE1 and D1). This is because this part of the Site already benefits from a high degree of landscape and visual containment, by surrounding landform (including railway embankments), built form and existing mature and dense vegetation. The higher slopes of the Site, which are intervisible with elevated farmland north of Funtley and up to Knowle village, would remain undeveloped and additional planting is proposed in these locations.

7.2 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

In terms of section 7 of the NPPF and NPPG section ID 26 relating to design, the proposed development seeks to provide attractive, high quality and inclusive design; with a strong sense of place, that is integrated with and respectful to the character and pattern of the local area. The proposed provision of a community building, community park and public open space with play areas provide opportunities for social interaction and active lifestyles. The built areas would be developed on the basis of perimeter blocks with good natural surveillance to all public areas. Adaptability and efficiency of the built environment would be important considerations. The proposed development carefully considers the topography of the Site and potential impact on views in the layout and form of the built areas.

In accordance with sections 8 (healthy communities) and 10 (climate change) of the NPPF, the areas of green and blue infrastructure would support action to combat effects of climate change through

provision of shading, water attenuation, and carbon absorption. Consistent with section 10 of the NPPF. Regarding NPPF section 11 (natural environment) the proposals protect the undulating landform of the Site and the majority of the existing vegetation, and seek to improve the biodiversity of the Site by creating further diversity to the range of planting and grassland types within it.

In accordance with NPPG Paragraphs 009 and 015 the proposed development promotes green infrastructure including a number of open and green public spaces; it respects natural features, and promotes a high quality landscape with many areas of planting that contributes to the quality of the local area. By placing development in the lower parts of the Site, and in association with existing built form, the wider landscapes of the Site would be maintained as open, while there would be negligible impact on surrounding areas (NPPG section ID 8).

7.3 Fareham Local Development Framework, Core Strategy (Adopted August 2011)

In turn, these proposals for the Site are consistent with the Fareham Core Strategy (2011) Strategic Objectives SO10 (to manage, maintain and improve the built and natural environment to deliver quality places, taking into account the character and setting of existing settlements); SO11 (to protect sensitive habitats and maintain separate settlement identity); as well as Policy CS4 (protection of habitats important to biodiversity and provision of accessible green space for informal recreation); Policy CS14 (to protect countryside from adverse effects on landscape, character and function arising from development); Policy C17 (to create high quality development that adheres to good urban design and sustainability principles, that is respectful of landscape, scale, form and spaciousness, and that includes greenways and trees within the public realm); Policy CS21 (to seek to provide alternative, and better public open space provision to replace the designated area of open space within the Site); and, Policy CS22 (the proposal does not affect the Strategic Gap located west of the disused railway line).

7. Policy Compliance

7.4 Fareham Borough Local Plan Part 2: Development Sites and Policies (Adopted June 2015) )

Referring to the Fareham Borough Local Plan Part 2 (2015), the proposed development:

- Seeks to mitigate and improve any potential impacts on neighbouring development and adjoining land, through respectful layout and provision of a robust landscape framework (In accordance with Policies DSP2 and DSP40);
- Does not adversely affect heritage assets (In accordance with Policies DSP5 and DSP40);
- Lies outside of the Defined Urban Settlement Boundary, but is located close to and would be in keeping with the character, scale and appearance of surrounding areas; is sited and designed to integrate with the existing settlement and prevent detracton from existing landscape; and is laid out to respect views into and out of the Site and to the elevated land to the south (In accordance with Policies DSP6 and DSP40);
- Protects designated nature conservation sites and provides additional planting within or around these; provides a wide range of new grassland, herbaceous, aquatic, shrub, hedge and tree planting, including native species and species supporting potential habitat creation, nectar and pollen provision; and retains the majority of the existing vegetation on the Site, providing a number of new landscape buffers and other areas of planting, as well as sustainable drainage ponds that would contribute to maintaining and reinforcing the biodiversity network (In accordance with Policies DSP13 and DSP40); and
- Does not adversely affect a Strategic Gap (In accordance with Policy DSP40).

In terms of the Planning Obligations Supplementary Planning Document for the Borough of Fareham (Excluding Welborne) Adopted April 2016, the proposed development provides a village green integrating play features to the north; and a community park to the south. In total, over 53% of the Site area (8.62ha out of 16.18ha) would remain undeveloped, for use as open spaces and for green and blue infrastructure.

7.5 Landscape Character

In accordance with Statement of Opportunity 1 (SEO1) set out in the profile for **National Character Area 128: South Hampshire Lowlands**, the proposed development promotes creative and effective sustainable development, including a well-connected network of high-quality greenspace, which would benefit local communities, protect local distinctiveness, encourage public understanding and enjoyment of the natural environment, and help to mitigate the impacts of climate change.

In addition, in accordance with SEO2, the proposed development would protect, manage and enhance the area’s historic well-wooded character – including its ancient semi-natural woodlands and hedgerows – to link and strengthen habitats for wildlife, and improve recreational opportunities.

There is also opportunity, in accordance with SEO3 to diversify the grassland habitats with the Site, providing recreational opportunities and potential improved biodiversity.

In accordance with the opportunities for **Hampshire County Landscape Character Area 3E: Meon Valley**, the proposed development:

- Keeps development within the valley bottom and avoids building on the slopes and elevated parts of the Site;
- Retains the majority of the existing vegetated boundary structure to the Site;
- Provides many areas of green infrastructure with retained and new planting; and
- Creates potential pedestrian / cycle links to existing settlements and public rights of way.

In accordance with the priorities for enhancement for **Fareham Borough Landscape Character Area 6: Meon Valley**, the proposed development:

- Protects important landscape and ecological resources, woodland and the slopes and ridge of the Site, which form part of the valley within which it lies;
- Creates a development that is limited in extent and which relates well to the existing Funtley village, maintaining an informal, rural character to the southern parts of the Site (community park);
- Provides opportunity to remove unsightly features from the Site;
- Sets development away from the Site boundaries, providing space to reinforce existing boundary vegetation with additional landscape buffers, that protect the character of the nearby roads and settlement. Where vegetation removal is required to facilitate safe access and egress from the Site, this would be minimised as far as possible, with new planting provided within the Site, outside of visibility splays; and
- Reinforces the retained green infrastructure network with many new areas of planting, including as part of the sustainable drainage strategy.

## 8. Summary and Conclusions

### 8.1 Summary of the baseline conditions

The Site is located at south-western edge of Funtley village in Hampshire and is bound by Funtley Road to the north and Honey Lane to the west.

The Site lies wholly within the landscape designation of 'Areas outside of Defined Urban Settlement' as defined in the proposal map of the Fareham Borough Core Strategy (adopted August 2011), whilst the area within north-western part of the Site is also designated as 'Existing Open Space' albeit this is not currently accessible to the public. The Ancient Woodland of Great Beamond Coppice is also located within the north east of the Site.

The Great Beamond Coppice is designated as a Site of Importance for Nature Conservation together with the existing tree groups located near the existing access entrance along the northern boundary and south-western boundary as shown on Figures 2.1 and 4.1. There are no other landscape designations within the Site. The Site is also subject to the influences of the nearby M27 motorway, settlement at Funtley village and the live railway to the east; with the addition of a telecommunications mast and timber poles carrying overhead lines within the Site. Therefore, the existing Site is considered to have a medium landscape value overall.

The Site is allocated for residential units in the emerging Fareham Local Plan 2036, subject to Policy HA10. In addition, the updated Borough Landscape Assessment (part of the Local Plan evidence base) indicates that small scale and sensitively integrated development could be accommodated in this location. The development allocation would remove the open space designation within the Site, albeit other existing policy provision seeks the provision of alternative or better uses. Several new, publicly accessible open spaces are therefore included as part of the scheme proposals.

Across the study area, there are a number of heritage assets comprising of Listed Buildings, Scheduled Ancient Monuments and local non-designated heritage asset Historic Parks and Gardens. There are no heritage assets located within or adjacent to the Site and none would be affected by the proposed development.

Views of the Site from the wider landscape (including the South Downs National Park) are truncated due to the undulating landform and intervening vegetation, whilst open and partial views of the internal ground plane and vegetation within and along the Site are apparent from the receptors located within close proximity of the Site - along parts of Funtley Road, Stag Way, Roebuck Avenue, Honey Lane; along part of Bridleway 515 to the west, near the bridge crossing over Funtley Road; and from parts of Public Footpaths 88 and 89 to the east of Funtley.

### 8.2 Summary of the landscape effects

The proposed development within the Site would not noticeably alter the landscape character at the national or county levels as discussed in this LVIA (**negligible** effects).

It is predicted that there would be, at worst, a **moderate - major** negative effect on land use landscape character at Site level - that is, the parts of the Site proposed for built development, due to the change in character from semi-enclosed pasture fields. Beyond this built area, the effects on the character of the wider Site and immediate context is predicted to be at worst, **minor - moderate** negative, but on the wider Borough character area, effects would be no greater than **negligible** or **minor**. Nevertheless, the proposed development is sited in close proximity to existing settlement and would not affect separate settlement identity or gaps.

Some modifications to landform would be required within the Site to provide safe access into, out of and within the proposed development, and to provide effective development platforms. The more steeply sloping and elevated parts of the Site would not be built on, with localised ground modelling only required to construct new pedestrian and cycle paths.

The effect on the Site landform is predicted to be at worst, **minor - moderate** negative at the construction stage only. Vegetation removal within the Site would be limited to that essential to facilitate effective development, to provide a safe area for new residents, or for other arboricultural or ecological reasons as identified by the relevant project specialists. The effects are predicted to be at worst, **moderate** negative at the construction stage, albeit these effects would be largely localised to the area proposed for built form.

The proposed development would, from the outset, be contained within an existing landscape framework of retained and protected mature hedges, trees, tree belts and woodland. There would also be retained open land (for community park uses) to the south. The proposed village green open space to the north would include play facilities and incorporate the retained SINC.

As the many areas of proposed landscape mitigation planting mature, the short term negative effects on land use and landscape character identified above would improve considerably with time, further reinforcing landscape integration, visual softening and partial screening.

Thus the effects on Site character and the immediate context would reduce by Year 15 to at worst **minor** negative (a clear day in winter) to at best **minor - moderate** positive, due to the ongoing positive management of the existing vegetation within the Site, and reinforcement of this with an additional robust network of varied landscape planting, diverse grasslands and planting associated with the proposed sustainable drainage features.

The many new areas of planting proposed would replace vegetation lost, while providing a considerable additional resource to the Site. Therefore, the effect on the Site vegetation is predicted to be **minor** positive in Year 1 and **moderate** positive by Year 15 when this is maturing.



## 8. Summary and Conclusions

### 8.2 Summary of the landscape effects (continued)

In terms of land use and the designated open space area of the Site, the provision of a total of 8.62ha of new publicly accessible open space with the proposed development is predicted to give rise to **minor - moderate** positive effects from Year 1 of operation. This would mean that over 53% of the total Site area of 16.18ha) would remain undeveloped and semi-rural in character.

Furthermore, the potential to provide pedestrian and cycle links to existing settlement north of Funtley Road, to Bridleway 515 to the west, and to Fareham to the south (by opening up the bridge link over the M27), the proposed development is predicted to give rise to **minor - moderate** positive effects on the public rights of way network from Year 1.

### 8.3 Summary of the visual effects

Regarding visual effects, the most noticeable visual change arising from the proposed development would be for the road users of Funtley Road and residents along the north side of the road, including a few residents of Stag Way and Roebuck Avenue. The views would be direct and in close range of the Site, albeit some views would be partly filtered by existing boundary vegetation.

Residents of Bramleigh at the south end of Honey Lane would have more distant and elevated views to the proposed development, seen in context with existing development at Funtley, and the farmland, and built areas including part of Knowle village to the north of Funtley. While development would be brought forward in these views, overall, the character and amenity of the panoramic views would be retained.

The construction and Year 1 operational effects are predicted to be at worst, **moderate - major** negative for residents along Funtley Road / Stage Way / Roebuck Avenue / Honey Lane; and **minor - moderate** negative for the transient receptors using Funtley Road. The mitigation planting associated with the built development would reduce these visual effects to at worst, **minor** negative for Funtley

Road residents and road users by Year 15. The scheme proposes to retain views beyond the built area to the elevated and more open higher ground within the community park to the south.

No notable visual effects are predicted from Public Footpaths 88 and 89 to the east of Funtley, due to the limited areas of the Site visible, and screening by landform, built form at Funtley and vegetation in the intervening areas.

From Bridleway 515 to the west, some partial views and glimpses of the proposed development would be seen beyond existing vegetation along the embankments of the disused railway line. These views would be in context with partial views and glimpses of existing built form to the north of the Site, and would be in context with retained semi-open parkland with additional planting south of the built area. The Year 1 effects are predicted to be at worst, **moderate** negative, and only from a short section of the Bridleway in the vicinity of the bridge crossing over Funtley Road. By Year 15, the softening and enclosing effect of mitigation planting is predicted to reduce the visual effects to at worst, **minor** negative. There would be no views of the development from most sections of the Bridleway due to physical and visual separation by dense vegetation in the intervening areas.

### 8.3 Conclusions

It is considered that the proposed development, which is subject to an allocation in the emerging Fareham Local Plan 2036, would represent a relatively limited and logical extension to an existing settlement. No widespread landscape or visual effects are predicted, and those effects predicted to occur at a Site and immediate site context level can be effectively mitigated and compensated for. The proposed development also offers opportunity for long term management of the Site and its mature vegetation (including Ancient Replanted Woodland); and provision of an additional robust structure of green infrastructure incorporating a diverse range of planting and grasslands, including within the areas of sustainable drainage. There would be the provision of a considerable area of new publicly accessible open space. The development is proposed to

be well connected to existing settlement and public rights of way. In conclusion, therefore, with careful consideration of the constraints and opportunities of the Site, an appropriate development can be provided without substantial harm to landscape or views, but which provides a number of community and landscape benefits.



## Appendix 1 – fabrik LVA Methodology

### A1.1 Introduction

The methodology employed in carrying out an LVA or LVA with an impact statement of the Site, is drawn from the Landscape Institute and the Institute of Environmental Management and Assessment's "Guidelines for Landscape and Visual Impact Assessment" (GLVIA) Third Edition (Routledge 2013).

The term landscape is defined as an area perceived by people, whose character is the result of the action and interaction of nature and / or human factors. It results from the way that different components of our environment – both natural and cultural / historical interact together and are perceived by us. The term does not mean just special, valued or designated landscapes and it does not only apply to the countryside. The definition of landscape can be classified as:

- All types of rural landscape, from high mountains and wild countryside to urban fringe farmland (rural landscapes);
- Marine and coastal landscapes (seascapes); and
- The landscape of villages, towns and cities (townscapes).

An LVA with an impact statement provides a description of the baseline conditions and sets out how the study area and site appears, or would appear, prior to the proposed development. The baseline assessment is then used to predict the landscape and visual impacts arising from the proposed development. The assessment of impact is carried out as part of the iterative design process in order to build in mitigation measures to reduce the impacts as much as possible. The impact assessment will identify and assess effects during the construction and operational stages of the proposed development.

### A1.2 Summary Overview of LVA Methodology

The LVA baseline assessment describes:

- Each of the landscape elements which then collectively inform landscape character for the contextual area to the site and the site itself;
- The character, amenity and degree of openness of the view from a range of visual receptors (either transient, serial or static views);
- The current baseline scenarios;
- The value of each of the landscape and visual receptors.

Landscape effects derive from changes in either direct or in-direct changes to the physical landscape, which may give rise to changes to the individual landscape components which in turn effects the landscape character and potentially changes how the landscape is experienced and valued.

Visual effects relate to the changes that arise in the composition, character and amenity of the view as a result of changes to the landscape elements.

The assessment of effects therefore systematically:

- Combines the value of the receptor with the susceptibility to the proposed change to determine the sensitivity of the receptor;
- Combines the size, scale, geographic extent, duration of the proposals and its reversibility in order to understand the magnitude of the proposal.
- Combines the sensitivity of the each of the receptors and the magnitude of effect to determine the significance of the effect.
- Presents the landscape and visual effects in a factual logical, well-reasoned and objective fashion.
- Indicates the measures proposed over and above those designed into the scheme to prevent/avoid, reduce, offset, remedy, compensate for the effects (mitigation measures) or which provide an overall landscape and visual enhancement;

- Sets out any assumptions considered throughout the assessment of effects.

Effects may be positive (beneficial) or negative (adverse) direct or indirect, residual, permanent or temporary short, medium or long term. They can also arise at different scales (national, regional, local or site level) and have different levels of significance (major, moderate, low, negligible or neutral / no change). The combination of the above factors influences the professional judgement and opinion on the significance of the landscape and visual effect.

The following sections sets out in more detail the assessment process employed.

A1.3 Establishing the Landscape Baseline

**Desk and Field Studies:** The initial step is to identify the existing landscape and visual resource in the vicinity of the proposed development – the baseline landscape and visual conditions. The purpose of baseline study is to record and analyse the existing landscape, in terms of its constituent elements, features, characteristics, geographic extent, historical and cultural associations, condition, the way the landscape is experienced and the value / importance of that particular landscape. The baseline assessment will also identify any potential changes likely to occur in the local landscape or townscape which will change the characteristics of either the site or its setting.

An desk study is carried out to establish the physical components of the local landscape and to broadly identify the boundaries of the study area. Ordnance survey (OS) maps and digital data is used to identify local features relating to topography/ drainage pattern, land cover, vegetation, built developments/settlement pattern, transport corridors/definitive public rights of way and any historic or prominent landscape features, which together combine to create a series of key characteristics and character areas. Vertical aerial photography will be used, to supplement the OS information. At this stage, any special designated landscapes (such as Areas of Outstanding Natural Beauty, National Parks, Green Belt, Conservation Areas, Listed Buildings, Areas of Special Character); heritage or ecological assets are identified. A review of information available in terms of any published historic landscape characterisation together with any other landscape / capacity / urban fringe and visual related studies is carried out at this stage.

Landscape character assessment, is the tool for classifying the landscape into distinct character areas or types, which share common features and characteristics. There is a well established methodology developed in the UK by the Countryside Agency and Scottish Natural Heritage in 2002, with further guidance published by Natural England in 2014. The national and regional level character assessments are often available in published documents, however the local / district or site levels may need to be set out

based on a combination of desk studies and field survey work. The character assessment will also identify environmental and landscape opportunities, recent changes, future trends and forces for change where they may be important in relation to the proposal, especially considering how the landscape appears, or would appear prior to the commencement of development. The condition of the landscape, i.e. the physical state of an individual area of landscape, is described as factually as possible. The assessment of landscape importance includes reference to policy or designations as an indicator of recognised value, including specific features or characteristics that justify the designation of the area. The value of that landscape by different stakeholders or user groups may also influence the baseline assessment.

If published local / site level landscape character assessments are not available, the landscape is to be classified into distinctive character areas and / or types, based on variations in landform, land cover, vegetation / settlement pattern, field pattern, enclosure, condition, value and etc. The classification will take into account any National, County/District and Parish level landscape character assessments.

These desk based studies are then used as a basis for verification in the field.

Judgements on the value of both the landscape and visual receptor are made at the baseline stage.

Landscape Value

Value is concerned with the relative value or importance that is attached to different landscapes. The baseline assessment considers any environmental, historical and cultural aspects, physical and visual components together with any statutory and non-statutory designations and takes into account other values to society, which may be expressed by the local community or consultees. These tables are considered a starting point for consideration in the field. The landscape designations are to be considered in terms of their ‘meaning’ to today’s context. The following table sets out the criteria

and definitions used in the baseline assessment to determine landscape value at the local or site level (in addition to condition / quality as set out on the previous page). Wherever possible information and opinions on landscape value is to be sought through discussions with consultees, stakeholders and user groups.

Table A1.1 sets out the criteria used to determine landscape condition / quality and value at the local or site level in the field.

Table A1.1 – Landscape Value Criteria

Criteria
<b>High (Very Good / Good Condition)</b> International - National - Regional Scale
<ul style="list-style-type: none"><li>Exceptional landscape with outstanding perceptual qualities. Very attractive, intact, natural, scenic, rare, wild and tranquil. The landscape may include World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty or Heritage Coast or key elements/features within them; together with any non-statutory designations. Alternatively, the landscape may be un-designated but is valued as set out in published landscape character assessments and which, for example, identify and artistic and literary connections which assist in informing the identify of a local area (such as ‘Constable Country’);</li><li>Recognisable landscape or townscape structure, characteristic patterns and combinations of landform and landcover are evident, resulting in a strong sense of place;</li><li>No or limited potential for substitution and which is susceptible to small changes;</li><li>A landscape that contains particular characteristics or elements important to the character of the area;</li><li>A valued landscape for recreational activity where the experience of the landscape is important;</li><li>Good condition with -appropriate management for land use and land cover, or with some scope to improve certain elements;</li><li>Distinct features worthy of conservation;</li><li>Unique sense of place;</li><li>No or limited detracting features.</li></ul>

Criteria
<b>Medium (Good - Ordinary Condition)</b> Regional - Local Scale
<ul style="list-style-type: none"><li>• Ordinary landscape and perceptual qualities. The landscape may include local designations such as Special Landscape Areas, Areas of Great Landscape Value, Strategic or Local Gaps; or un-designated but value expressed through literature, historical and / or cultural associations; or through demonstrable use by the local community; together with any non-statutory designations. Alternatively, the landscape may be valued through the landscape character assessment approach.</li><li>• Distinguishable landscape or townscape structure, with some characteristic patterns of landform and landcover;</li><li>• Potential for substitution and tolerant of some change;</li><li>• Typical, commonplace farmed landscape or a townscape with limited variety or distinctiveness;</li><li>• A landscape which provides recreational activity where there are focused areas to experience the landscape qualities;</li><li>• Scope to improve management;</li><li>• Some dominant features worthy of conservation;</li><li>• Some detracting features.</li></ul>
<b>Low (Ordinary - Poor Condition)</b> Local /Site Scale
<ul style="list-style-type: none"><li>• Poor landscape and perceptual qualities. Generally un-designated. Certain individual landscape elements or features may be worthy of conservation and landscape either identified or would benefit from restoration or enhancement (such as local parks and open spaces). Alternatively, the landscape may be valued through the landscape character assessment approach.</li><li>• Monotonous, weak, uniform or degraded landscape or townscape which has lost most of it's natural or built heritage features and where the landcover are often masked by land use;</li><li>• Tolerant of substantial change;</li><li>• A landscape which provides some recreational activities with limited focus on the landscape attributes;</li><li>• Lack of management and intervention has resulted in degradation;</li><li>• Frequent dominant detracting features;</li><li>• Disturbed or derelict land requires treatment.</li></ul>

A1.4 Establishing in the Visual Baseline

**Desk and Field Studies:** The visual baseline will establish the area in which the site and the proposed development may be visible, the different groups of people who may experience the views, the places where they will be affected and the nature, character and amenity of those views.

The area of study for the Visual Assessment is determined through identifying the area from which the existing site and proposal may be visible (the Zone of Theoretical Visibility or ZTV). The baseline ZTV of the site is determined through either manual topographical analysis (a combination of desk and field based analysis which are considered appropriate for Landscape and Visual Appraisals and projects below the EIA threshold) or digital mapping based on bare earth modelling, (which do not take account of features such as vegetation or built form) constructing a map showing the area where the proposal may theoretically be visible. The extent of the mapping will depend on the type of proposal. The actual extent of visibility is checked in the field (both in the summer and winter months if the project timescales allow) to record the screening effect of buildings, walls, fences, trees, hedgerows and banks not identified in the initial bare ground mapping stage and to provide an accurate baseline assessment of visibility. Viewpoints within the ZTV should also be identified during the desk assessment, and the viewpoints used for photographs selected to demonstrate the relative visibility of the site (and any existing development on it and its relationship with the surrounding landscape and built forms). The selection of a range of key viewpoints will be based on the following criteria for determination in the field:

- The requirement to provide an even spread of representative, specific, illustrative or static / kinetic / sequential / transient viewpoints within the ZTV and around all sides of the Site.
- From locations which represent a range of near, middle and long distance views (although the most distant views may be discounted in the impact assessment if it is judged that visibility from this distance will be extremely limited).
- Views from sensitive receptors within designated, historic or cultural landscapes or heritage assets (such as from within World Heritage Sites; adjacent to Listed Buildings - and co-ordinated

- with the heritage consultant - Areas of Outstanding Natural Beauty or Registered Parks and Gardens) key tourist locations and public vantage points (such as viewpoints identified on OS maps).
- The inclusion of strategic / important / designed views and vistas identified in published documents.

Views from the following are to be included in the visual assessment:

1. Individual private dwellings. These are to be collated as representative viewpoints as it may not be practical to visit all properties that might be affected.
2. Key public buildings, where relevant (e.g. libraries; hospitals, churches, community halls etc)
3. Transient views from public viewpoints, i.e. from roads, railway lines and public rights of way (including tourist or scenic routes and associated viewpoints);
4. Areas of open space, recreation grounds and visitor attractions; and
5. Places of employment, are to be included in the assessment where relevant.



A1.4 Establishing in the Visual Baseline (continued)

The final selection of the key viewpoints for inclusion in the LVA will be based proportionately in relation to the scale and nature of the development proposals and likely significant effects and in agreement with the LPA.

The visual assessment should record:

- The character and amenity of the view, including topographic, geological and drainage features, woodland, tree and hedgerow cover, land use, field boundaries, artefacts, access and rights of way, direction of view and potential seasonal screening effects will be noted, and any skyline elements or features.
- The type of view, whether panoramas, vistas or glimpses.

The baseline photographs are to be taken in accordance with the Landscape Institutes technical guidance on Photography and Photomontage in LVIA (Landscape Institute 2011). The extent of visibility of the range of receptors is based on a grading of degrees of visibility, from a visual inspection of the site and surrounding area. There will be a continuity of degree of visibility ranging from no view of the site to full open views. Views are recorded, even if views are truncated of the existing site, as the proposed development may be visible in these views. To indicate the degree of visibility of the site from any location three categories are used:

- a) **Open View:**  
An open, unobstructed and clear view of a significant proportion of the ground plane of the site; or its boundary elements; or a clear view of part of the site and its component elements in close proximity.
- b) **Partial View:**  
A view of part of the site, a filtered or glimpsed view of the site, or a distant view where the site is perceived as a small part of the wider view;

- c) **Truncated View:**  
No view of the site or the site is difficult to perceive.

Following the field survey (which should cover ideally both winter and summer views) the extent to which the site is visible from the surrounding area will be mapped. A Photographic Viewpoint Plan will be prepared to illustrate the representative, specific and illustrative views into / towards and within the Site (if publicly accessible) and the degree of visibility of the site noted. This Plan will be included in a Key Views document for agreement with the Local Planning Authority and any other statutory consultees as part of the consultation process. The visual assessment will include a series of annotated photographs, the location and extent of the site within the view together with identifying the character and amenity of the view, together with any specific elements or important component features such as landform, buildings or vegetation or detracting features which interrupt, filter or otherwise influence views. The photograph will also be annotated with the Value attributed to the receptor or group of receptors.

By the end of this stage of the combined landscape and visual site study, it will be possible to advise, in landscape and visual terms, on any specific mitigation measures required in terms of the developments preferred siting, layout and design.

Value of Visual Receptors

Judgements on the value attached the views experienced are based on the following criteria.

Table A1.2 – Value Attached to Views

Value	Criteria
High	Views from landscapes / viewpoints of national importance, or highly popular visitor attractions where the view forms an important part of the experience, or with important cultural associations. This may include residential receptors in Listed Buildings where the primary elevation of the dwelling is orientated to take advantage of a particular view (for example across a Registered Park and Garden or National Park).
Medium	Views from landscapes / viewpoints of regional / district importance or moderately popular visitor attractions where the view forms part of the experience, or with local cultural associations. This may include residential receptors where the primary elevation of the dwelling is orientated to take advantage of a particular view.
Low	Views from landscapes / viewpoints with no designation, not particularly important and with minimal or no cultural associations. This may include views from the rear elevation of residential properties.



Susceptibility of the Visual Receptor to the Proposed Change

The susceptibility to the proposed changes in views and visual amenity occur as a result of the occupation or activity of people experiencing the view and the extent to which their attention or interest may be focused on the views and the visual amenity they experience. The grouping of susceptibility of the visual receptors is set out later in this document.

A1.5 Predicting and Describing the Landscape and Visual Effects

An assessment of visual effect deals with the change on the character and amenity arising from the proposal on the range of visual receptors.

The assessment of effects aims to:

- Identify systematically and separately the likely landscape and visual effects of the development;
- Identify the components and elements of the landscape that are likely to be affected by the scheme;
- Identify interactions between the landscape receptors and the different components of the development at all its different stages (e.g. enabling, construction, operation, restoration etc);
- Indicate the secondary mitigation measures over and above those already designed into the scheme proposed to avoid, reduce, remedy or compensate for these effects;
- Estimate the magnitude of the effects as accurately as possible and considering this in relation to the sensitivity of the receptor; and
- Provide an assessment of the significance of these effects in a logical and well-reasoned fashion.

Having established the value of the landscape and visual receptor, the effects are then considered in relation to the magnitude of change, which includes the size / scale, geographical extent of the areas influenced and the duration and reversibility.

Wherever possible tables or matrixes will be used, linked with the illustrative plans, so that the landscape and visual effects are recorded and quantified in a systematic and logical manner. Consideration is given to the impacts on completion of development at Year 1 and at maturity (Year 15) (to represent short, medium and long term effects) so that the effects of the development after mitigation has matured are identified. Assumptions or limitations to the assessment will also be set out.

Effects will include the direct and/or indirect impacts of the development on individual landscape elements / features as well as the effect upon the general landscape character and visual receptors.

Landscape Susceptibility

Landscape susceptibility is evaluated by its ability to accommodate the proposed change (i.e. the degree to which the landscape is able to accommodate the **proposed** change without undue consequences for the maintenance of the baseline situation and / or the achievement of landscape planning policies and strategies) as set out in Table A1.2.

As part of the assessment of the landscape character and its component parts, conclusions will be drawn as to the overall susceptibility of the landscape / landscape elements and visual environment to the type of development proposed. Existing landscape capacity assessments may form a starting point for the refinement of the assessment of landscape susceptibility at the local and site level.

Table A1.3 – Landscape Susceptibility Criteria

Susceptibility	Criteria
High	A landscape or townscape particularly susceptible to the proposed change, which would result in significant negative effects on landscape character, value, features or individual elements.
Medium	A landscape or townscape capable of accepting some of the proposed change with some negative effects on landscape character, value, features or elements.
Low	A landscape or townscape capable of accommodating the proposed change without significant negative effects on landscape character, value, features or elements.

Landscape Sensitivity

The assessment of landscape sensitivity is then combined through a judgement on the value attributed to that landscape receptor / component and the susceptibility of the landscape receptor to the proposed change using the following matrix.

Table A1.4 - Landscape Sensitivity

		Landscape Receptor Susceptibility		
		High	Medium	Low
Landscape Value	High	High	High - Medium	Medium
	Medium	High - Medium	Medium	Medium - Low
	Low	Medium	Medium - Low	Low - Negligible

Visual Susceptibility

The susceptibility of the different types of people to the changes proposed is based on the occupation of the activity of the viewer at a given location; and the extent to which the persons attention or interest may be focussed on a view, considering the visual character and amenity experienced at a given view. The criteria used to assess the susceptibility of a visual receptor are summarised below.

Table A1.5 – Visual Susceptibility Criteria

Susceptibility	Criteria
High	People with particular interest in the view, with prolonged viewing opportunity, including: Residents where views contribute to the landscape setting enjoyed by the community; those engaged in outdoor recreation, such as those using public rights of way; views from within the designated landscapes and heritage assets where the views of the surroundings are an important contributor to the experience; travellers along scenic routes.
Medium	People with moderate interest in the view and their surroundings, including: Communities where the development results in changes in the landscape setting or value of views enjoyed by the community; people travelling through the landscape, where the appreciation of the view contributes to the enjoyment and quality of that journey; people engaged in outdoor recreation, where their appreciation of their surrounding and particular view is incidental to their enjoyment of that activity.
Low	People with momentary, or little interest in the view and their surroundings, including: People engaged in outdoor sport; People at their work place; Travellers where the view is fleeting or incidental to the journey.

Visual Sensitivity

The sensitivity of visual receptors in views is based on the professional judgement combining the value and susceptibility to change on that visual receptor.

Table A1.6 - Visual Sensitivity

		Visual Receptor Susceptibility		
		High	Medium	Low
Value of Visual Receptor	High	High	High - Medium	Medium
	Medium	High - Medium	Medium	Low
	Low	Medium	Low	Low - Negligible

A1.6 Magnitude of Effects

In determining the magnitude of landscape effects, this will consider:

1. Scale and size of the change in the landscape (considering the changes to individual components and the effect this has on contribution to landscape character; the degree to which aesthetic or perceptual aspects of the landscape are altered; whether the effect changes the key characteristics of the landscape);
2. Geographic extent over which the landscape effects will be experienced (effects limited to the site level; effects on the immediate setting; effects relating to the scale of the landscape type or character area; effects on a larger scale such as influencing several landscape character areas); and
3. The duration, permanence and reversibility of the proposal.

Similar to landscape effects, the magnitude of visual effects will consider:

1. Scale and size of the change to the view (considering loss or addition of features to the view and proportion of the view occupied by the proposed development; the degree of contrast or integration of any new landscape features or changes in the landscape and characteristics in terms of form, scale, mass, line, height, colour and texture; and the nature of the view of the proposed development relative to the time over which it will be experienced and whether views will be full, partial or glimpses).
2. Geographical extent (including the angle of the view; the distance of the viewpoint to the proposed development; and the extent of the area over which the changes would be visible).
3. The duration, permanence and reversibility of the proposal.

A1.7 Significance of Effects

The two principal criteria determining the significance of effects are the sensitivity of the receptor in relation to the magnitude of effect. A higher level of significance is generally attached to the magnitude of change on a sensitive receptor; for example, a low magnitude of change on highly sensitive receptor can be of greater significance than very high magnitude of change on low sensitivity receptor. Therefore, whilst the table opposite sets out a starting point for the assessment, it is important that a balanced and well reasoned professional judgement of these two criteria is provided and an explanation provided.

In order to develop thresholds of significance, both the sensitivity of receptors and the magnitude of change must be classified for both landscape receptors and visual receptors as set out in the tables below. Where landscape effects are judged to be adverse, additional mitigation or compensatory measures are to be considered. The significant landscape effects remaining after mitigation are then to be summarised as the residual effects.

Magnitude Elements					Overall Magnitude of Change
Size / Scale	Geographic Extent	Duration	Permanence	Reversibility	
Major	Wide or Local; Direct and open view	Long - Short Term	Permanent or Temporary	Irreversible or Reversible	High
Major	Site Level; Direct and open view	Long - Short Term	Permanent or Temporary	Irreversible or Reversible	High - Medium
Moderate	Local / Site Level; Direct or oblique, partial view	Long - Short Term	Permanent or Temporary	Irreversible or Reversible	Medium - Low
Minor	Local / Site level; Oblique partial or glimpsed view	Long - Short Term	Permanent or Temporary	Irreversible or Reversible	Low
Negligible	All of the above and a truncated view	Long - Short Term	Permanent or Temporary	Irreversible or Reversible	Negligible

The criteria for each of the above is to be determined relative to the size and scale of the individual project applying professional judgement and opinion.

However, the following are typically used:

- Size and Scale:** relates to the combination of the following (and are linked to the descriptions set out under table A1.9):
- extent of existing landscape elements that will lost (to proportion of the total extent that is lost) and the contribution that the element has to landscape character;
  - the degree to which aesthetic or perceptual aspects of the landscape are altered (addition or removal of features and elements)
  - whether the effect changes the key distinctive characteristics of the landscape;
  - size and scale of change in the view with respect to the loss or addition of features in the view and changes to the composition, including the proportion of the view occupied by the proposed development;
  - the degree of contrast or integration of any new features or changes in the townscape with the existing or remaining townscape or landscape elements and characteristic terms of form, scale, mass, line, height, colour and texture;
  - the nature of the view of the proposed development, in terms of relative amount of time over which it will be experienced and whether views will be open, partial, glimpsed.

**Geographic Extent:** The geographic area over which the landscape effects will be felt relative to the proposal; and relative to visual receptors is to reflect the angle of the view; the distance of the viewpoint; the extent of the area over which the changes would be visible.

**Duration, Permanence and Reversibility:** These are separate but linked considerations and are project specific. For example, changes to a brownfield urban site could be reversible. Construction impacts are likely to be short term, temporary, but see the start of a permanent change. Operational effects are likely to be long term, permanent and either irreversible or reversible, depending on the nature of the project.

**No change:** If there is no change to the landscape or visual receptor then the overall magnitude of change will be **Neutral**.

A1.7 Significance of Effects (continued)

Effects will be described clearly and objectively, and the extent and duration of any negative / positive effects quantified, using four categories of effects, indicating a gradation from high to low.

Table A1.7 - Sensitivity and Magnitude of Effects

		Landscape and Visual Receptor Sensitivity		
		High	Medium	Low
Magnitude of Change	High	Major	Moderate to Major	Moderate
	Medium	Moderate to Major	Moderate	Minor - Moderate
	Low	Moderate to Major	Minor - Moderate	Minor
	Negligible	Negligible	Negligible	Negligible
	Neutral	Neutral	Neutral	Neutral

The degree of effect is graded on the following scale in relation to the significance criteria above:

Table A1.9 - Significance of Landscape and Visual Effects

Effect Significance	Criteria
Substantial negative / adverse effect	Where the proposals would cause the substantial or significant loss of key mature landscape elements and characteristic features / a significant deterioration in the character and amenity of the view in terms of perceptual qualities / or introduce element(s) considered to be wholly and substantially uncharacteristic of the area; and where the proposals would result in a significant change, or more notable change in more distant views, on the character and amenity of the view from the range of visual receptors.
Major negative / adverse effect	Where the proposals would cause the total loss of key mature landscape elements and characteristic features / a major deterioration in the character and amenity of the view in terms of perceptual qualities / or introduce element(s) considered to be wholly and substantially uncharacteristic of the area; and where the proposals would result in a significant change, or more notable change in more distant views, on the character and amenity of the view from the range of visual receptors.
Moderate negative / adverse effect	Where the proposals would cause the loss of some of the key landscape elements and / or particularly representative characteristic features / or introduce elements considered significantly uncharacteristic of the area; and a noticeable deterioration in the character and amenity of the view from the range of visual receptors.
Minor negative / adverse effect	Where the proposals would cause the loss of some landscape elements or characteristic features / introduce elements characteristic of the area; and a barely perceptible deterioration in the character and amenity of the view from the range of visual receptors.

Negligible	Where the proposals would have no discernible deterioration or improvement in the existing baseline situation in terms of landscape elements or view.
Neutral	Where the proposals would result in no change overall (resulting in no net improvement or adverse effect).
Minor positive / beneficial effect	Where the proposals would result in minor loss or alteration or improvement of the key elements and features / provide a small enhancement to the existing landscape elements or characteristic features; and cause a barely perceptible improvement in the existing view for the range of receptors.
Moderate positive / beneficial effect	Where the proposals would cause some enhancement to the existing landscape elements or characteristic features / noticeable improvement in the character and amenity of the existing view from a range of visual receptors.
Major positive / beneficial effect	Where the proposals would cause a major enhancement to the existing landscape elements or characteristic features / noticeable improvement in the character and amenity of the existing view from a range of visual receptors.
Substantial positive / beneficial effect	Where the proposals would cause a significant enhancement to the existing landscape elements or characteristic features / wholesale improvement in the character and amenity of the existing view from a range of visual receptors.

Effects assessed as being greater than moderate are considered to be a significant effect.



### A1.8 Effects During Site Enabling and Construction

It is recognised that project characteristics and hence sources of effects, will vary through time. The initial effects arise from the site enabling and construction works. Sources of landscape and visual effects may include:

- The location of the site access and haulage routes;
- The origin and nature of materials stockpiles, stripping of material and cut and fill operations / disposal and construction compounds;
- The construction equipment and plant (and colour);
- The provision of utilities, including lighting and any temporary facilities;
- The scale, location and nature of any temporary parking areas and on-site accommodation;
- The measures for the temporary protection of existing features (such as vegetation, trees, ponds, etc) and any temporary screening (such as hoarding lines); and
- The programme of work and phasing of development.

### A1.9 Effects During Operation (at Year 1)

At the operational stage, the sources of landscape and visual effects may include:

- The location, scale, height, mass and design of buildings in terms of elevational treatment; structures and processes, including any other features;
- Details of service arrangements such as storage areas or infrastructure elements and utilities and haulage routes;
- Access arrangements and traffic movements;
- Lighting;
- Car parking;
- The noise and movement of vehicles in terms of perceived effects on tranquillity;
- Visible plumes from chimneys;
- Signage and boundary treatments;
- Outdoor activities that may be visible;

- The operational landscape, including landform, structure planting, green infrastructure and hard landscape features;
- Land management operations and objectives; and
- The enhancement or restoration of any landscape resource of particular view.

### A1.10 Mitigation and Compensatory Measures

The purpose of mitigation is to avoid, reduce and where possible, remedy or offset, any significant (major to minor) negative (adverse) effects on the landscape and visual receptors arising from the proposed development. Mitigation is thus not solely concerned with “damage limitation”, but may also consider measures that could compensate for unavoidable residual effects. Mitigation measures may be considered under three categories:

- Primary measures that intrinsically comprise part of the development design through an iterative process;
- Standard construction and operational management practices for avoiding and reducing environmental effects; and
- Secondary (or residual) measures designed to specifically address the remaining effects after the primary and standard construction practices have been incorporated.

If planting is required as part of the mitigation measures, it is proposed that areas of planting are introduced as part of the proposed development and the height of this planting will be considered as follows (dependent on plant specification and details of the scheme):

- Planting at completion / short term: 3-5 metres (dependent on plant specification).

Strategies to address likely negative (adverse) effects include:

- Prevention and avoidance of an impact by changing the form of development;
- Reduce impact by changing siting, location and form of development;

- Remediation of impact, e.g. by screen planting;
- Compensation of impact e.g. by replacing felled trees with new trees; and
- Enhancement e.g. creation of new landscape or habitat.

### A1.11 Guidelines for Mitigation:

- Consultation with local community and special interest groups, if possible, on the proposed mitigation measures is important;
- Landscape mitigation measures should be designed to suit the existing landscape character and needs of the locality, respecting and building on local landscape distinctiveness and helping to address any relevant existing issues in the landscape;

Many mitigation measures, especially planting, are not immediately effective. Where planting is intended to provide a visual screen for the development, it may also be appropriate to assess residual effects for different periods of time, such as day of opening at Year 1.

- The proposed mitigation measures should identify and address specific landscape issues, objectives and performance standards for the establishment, management maintenance and monitoring of new landscape features.
- A programme of appropriate monitoring may be agreed with the regulatory authority, so that compliance and effectiveness can be readily monitored and evaluated.

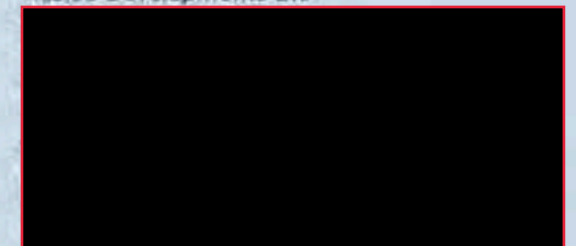


Report presented by

Fabrik Ltd.,



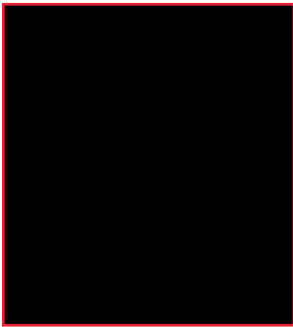
Reside Developments Ltd



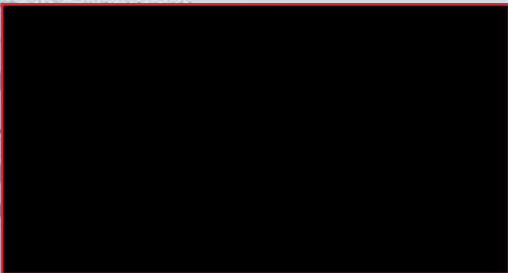
This page intentionally left blank.

Report presented by

Rummey environmental



Reside Developments Ltd

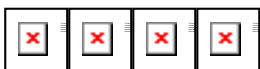


## Keely, Lauren

---

**From:** Consultation  
**Sent:** 21 December 2020 08:59  
**To:** Planning Policy  
**Subject:** Turley (on behalf of Solent University) response  
**Attachments:** Fareham Local Plan Consultation - Representations on Behalf of Solent University December 2020.pdf; Appendix 1 to Representations by Solent University.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Mervyn McFarland [REDACTED]  
**Sent:** 18 December 2020 20:31  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** Local Plan Consultation 2037 - Representations on Behalf of Solent University in relation to Warsash Maritime Academy (Policy HA7) and Related Policies

Dear Sirs,

Please find attached representations to the Publication version of the Local Plan on behalf of Solent University.

We look forward to acknowledgement of receipt in due course.

Yours sincerely,

Mervyn

**Mervyn McFarland**  
Director

## Turley



We are a CarbonNeutral® certified company.

We are working remotely wherever possible in line with Government guidance. Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance.

We support blended flexible working which means that co-owners will respond to you during their working hours and we appreciate that you will respond during your own working hours.

[turley.co.uk](https://www.turley.co.uk)

[Twitter](#)

[Linkedin](#)

Think of the environment, please do not print unnecessarily

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. Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions



# **Fareham Local Plan 2037 – Publication Version Consultation**

Representations on behalf of Solent University  
in relation to Warsash Maritime Academy  
(HA7)

December 2020

# Contents

1.	Introduction	3
2.	Policy H1: Housing Provision	4
3.	Policy HA7: Warsash Maritime Academy,	5
4.	Summary and Conclusions	8
Appendix 1: Representations to Reg 18 Fareham Local Plan Consultation re. HA7 Allocation 10		

Mervyn McFarland

**Client**

Solent University

**Our reference**

SOUS3009

18 December 2020

# 1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Solent University.
- 1.2 Our client owns the land interest at Warsash Maritime Academy, Fareham which forms the proposed Policy HA7 allocation.
- 1.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly.
- 1.4 We can confirm we wish to appear at the Examination in Public in due course and look forward to continuing to engage with the Local Plan process.

## 2. Policy H1: Housing Provision

- 2.1 Policy H1, of the Publication Version of the Fareham Local Plan 2037 does not properly address housing provision as it does not set out the minimum number of homes the Council is required to deliver.
- 2.2 It is appreciated that there has been some uncertainty around the housing requirement figure due to on-going national debate relating to the standard method to be adopted by the Government. At the time of submitting this response, the government has confirmed its approach which will require the Council to deliver 508 new homes per annum.
- 2.3 The 508 dwelling per annum figure should be viewed in the context of the unmet housing need which identifies in adjacent local authority areas, specifically Portsmouth. It is acknowledged that the Council has identified additional homes to help meet the identified short-fall in adjacent areas however this contribution is likely to be insufficient and we consider that the Council should do more to contribute to the substantial unmet needs across the south Hampshire sub-region.
- 2.4 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 (in this case Portsmouth) as discussed above. The minimum level of housing required should therefore be the local housing need figure plus unmet need within a neighbouring area which the Council has agreed to take.
- 2.5 Housing need arising from other growth strategies, for example the Partnership for South Hampshire (PfSH) strategy for sub-regional employment growth should also be taken into account in determining the minimum housing requirement.
- 2.6 We consider therefore that Policy H1 is not sound as currently drafted on the basis that:
  - (a) It does not adopt the recently confirmed standard method approach;
  - (b) It does not take sufficient account of the scale of unmet housing need in adjacent local authority areas, nor make sufficient provision to help address this unmet need, as required by the NPPF;
  - (c) It does not sufficiently take account of economic growth strategies for the wider (PfSH) area.

### 3. Policy HA7: Warsash Maritime Academy,

- 3.1 Part of the land at Warsash Maritime Academy, which is no longer required for educational use, was proposed for allocation in the preceding version of the Fareham Local Plan 2037 and we submitted representations on behalf of Solent University at that stage. A copy of the previous representations is attached as Appendix 1.
- 3.2 Solent University supports the allocation of the Warsash Maritime Academy site for a primarily residential re-development as proposed by Policy HA7. The site comprises previously developed land which is no longer required for educational use by the University and can be brought forward for redevelopment at an early stage in the local plan period. The Council is at an advanced stage in negotiations for the sale of the site to a third party who will deliver a residential-led redevelopment proposal.
- 3.3 Whilst the University, as land-owner is fully supportive of the principle of the allocation however, it considers that there are certain detailed requirements within the policy that need to be amended to ensure that Policy HA7 is effective and that development on the site is deliverable, at an early stage in the plan process, and is not unnecessarily constrained. In its current form the policy is considered unsound
- 3.4 We have set out in detail below the changes which we consider are required to Policy HA7 to ensure that it is effective.

#### **Allocated Use**

- 3.5 The draft allocation identifies the proposed use of the site as “residential” with an indicative yield of 100 dwellings.
- 3.6 SSU supports this allocation and acknowledges that it is intended to bring forward a residential-led redevelopment of the site. The policy should acknowledge however that the site includes two Listed Buildings (Shackleton and Moyana) which will be retained and converted as part of any redevelopment proposal. Flexibility is sought in terms of other uses that might be provided within these buildings to ensure that the site makes the greatest possible contribution to meeting identified needs (including the need for housing) and that beneficial uses can be found for the Listed Buildings. Whilst it is possible that both Shackleton and Moyana could be redeveloped for residential use, proposals have yet to be developed and the form and internal spaces of the buildings could be equally suited to other uses, for example as commercial space (Use Class E) in the case of Moyana or hotel accommodation in the case of Shackleton. It is not intended that these uses would be prioritised above residential use however, to provide an appropriate degree of flexibility to secure the optimum use of the Listed Buildings, the potential for alternative use should be recognised in the allocation.
- 3.7 We therefore request that the wording in respect of the Allocated Use is amended to state:

Allocated Use: Residential (including Use Classes C1, C2, C2a C3 and C4) with potential for commercial (Class E), Institutional (Class F1) or Community (Class F2) use of Moyana.



## **Indicative Yield**

- 3.8 Policy HA7 identifies an Indicative Yield for the allocation of 100 dwellings.
- 3.9 Having regard to our comments in respect of Policy H1, we consider it important that each allocated housing site should make the maximum possible contribution to meeting identified housing need, compatible with the environmental character of the site and surrounding area.
- 3.10 The University has previously made submissions to the SHLAA suggesting that the indicative site capacity should be increased and remains of the view that the indicative yield of 100 units is an underestimate of site capacity. Feasibility work undertaken in the context of the disposal of the site indicated that the site could potentially accommodate around 150 homes. The final number of homes delivered will be affected by the nature of the uses introduced to the Listed Buildings and it is acknowledged that if non-residential uses are introduced then the number of dwellings provide as part of the comprehensive redevelopment of the site will be lower.
- 3.11 We propose that the indicative yield should be amended to refer to 150 units, with the final capacity determined through the development management process taking account of the re-use of the Listed Buildings.

## **Site Specific Requirements**

### **Requirement (a)**

- 3.12 The University acknowledges that there may be potential for the Listed Shackleton building to be converted to flats however this should not be a requirement. It is possible that alternative uses (for example hotel use (Use Class C1) or residential institutional use (Use Class C2) could be accommodated within the building and would equally, or better, safeguard its architectural and historic interest. The policy does not need to be prescriptive with regard to the use of the Listed building and, to our knowledge, no work has been undertaken by the LPA to establish that conversion to flats would represent the optimal use.
- 3.13 Accordingly, we request that the words “including conversion of the building currently known as the Shackleton building to flats” are deleted from requirement (a).

### **Requirement (g)**

- 3.14 The need to deliver an appropriate re-use of the Listed Buildings on the site as part of proposals for the comprehensive redevelopment of the allocated site is recognised. The agreement of Historic England to proposals for re-use of the buildings is not required and there is no reason why Historic England would need to be involved in proposals for the re-use of the buildings which are Listed at Grade II.
- 3.15 Accordingly we request that the words “(subject to agreement with Historic England) are deleted from requirement (g) and that the words “or other compatible uses” are added at the end of the requirement.

**Requirement (j)**

- 3.16 The University recognises that it is important in both landscape and biodiversity terms, to ensure that efforts are made to incorporate the best quality trees into a future development proposal. We object however to the requirement for all trees on the site to be retained.
- 3.17 Area Tree Preservation Orders are recognised to be a 'blunt-tool' in dealing with tree protection. Moreover, the Area Tree Preservation Order which is imposed upon the site dates from 1993. As part of its work to assess the development potential of the Upper Site the University has commissioned an updated Tree Survey. The University has engaged with the LPA with a view to reviewing and refining the Area Tree Preservation Order such that it identifies and protects the most important trees on the site.
- 3.18 The university requests that the wording of Requirement (j) is amended to require the submission of a tree survey and arboricultural impact assessment as part of any planning application for the redevelopment of the site such that tree retention can be fully assessed through the development management process. The requirement to retain all trees should be deleted.

## 4. Policy D5: Internal Space Standards

- 4.1 Policy D5 requires developments to meet national spaces standards as a minimum.
- 4.2 The University wishes to see good quality homes delivered on the HA7 allocation site however the presence of Listed Buildings, which will need to be sensitively converted and adapted to new use, means that circumstances may arise on the site, and elsewhere in the Borough, where it may not be possible to fully achieve national space standards working within the existing building fabric.
- 4.3 We consider that Policy D5 is unsound as it has not been justified and should not be applied in a blanket manner to all developments.

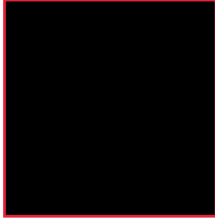
## 5. Summary and Conclusions

- 5.1 These representations have been prepared by Turley on behalf of Solent University in respect of the Fareham Borough Local Plan 2037 Consultation.
- 5.2 Our client owns the land interest at Warsash Maritime Academy, Fareham which forms the proposed Policy HA7 allocation.
- 5.3 In summary:
- The plan is unsound in that Policy H1 does not set out the minimum number of homes the Council is required to deliver and the quantum of housing being planned for is in itself insufficient to meet identified housing needs when the unmet needs of adjacent areas are taken into account.
  - We fully support the proposed allocation of the HA7 site at Warsash Maritime Academy. The land is surplus to the University's requirements as part of its educational estate with teaching and learning activities which previously took place on the site having been relocated. The site is available, and capable of delivering much needed housing, in the early years of the plan period.
  - Whilst supporting the principle of the HA7 allocation, we consider that there are various detailed aspects of the allocation policy which require amendment in order for the policy to be effective.
  - We have concerns regarding policy D5 - Internal Space Standards which we consider is not justified.

## **Appendix 1: Representations to Regulation 18 Fareham Local Plan Consultation**



Turley Office



7 December 2017  
**Delivered by email**

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

Ref: SOUW3002

Dear Sirs

## **REPRESENTATIONS TO FAREHAM BOROUGH DRAFT LOCAL PLAN 2036**

On behalf of our client, Southampton Solent University (SSU), we write to make representations to the current consultation on the Fareham Borough Draft Local Plan 2036.

The Council will be aware that SSU owns and operates Warsash Maritime Academy (WMA), part of the University's School of Maritime Science and Engineering. The University intends to continue its operations at Warsash but will be relocating its professional and higher level maritime education programmes from the Upper Site to Southampton City Centre. This will assist the University in its aims of strengthening and embedding maritime education across the University. Teaching for the fire school, maritime safety and offshore first aid and medical and seamanship courses will remain on the Lower Site of the Warsash campus, with investment plans for new and improved facilities.

The Upper Site was submitted to the Council for consideration as a potential housing site in response to a call-for-sites exercise and was assessed within the Council's SHLAA. It has now been taken forward as a proposed allocation within the Draft Local Plan. SSU fully supports the principle of the proposed allocation (HA7) of the Upper Site of the Warsash Maritime Academy.

In order to ensure that the proposed allocation does not unduly constrain the development potential of the site we request several changes to the draft allocation policy, as set out below. These will enable the development potential of the site to be realised in terms of delivering housing or other compatible uses whilst taking account of key constraints.

### **Proposed Use**

The draft allocation identifies the proposed use of the site for residential dwellings. SSU supports this allocation but flexibility is sought in terms of other uses that might be included to ensure that the site makes the greatest possible contribution to meeting identified needs (including the need for housing) and that the most suitable range of uses is developed. This will ensure that best use is made of the



development potential offered by this brownfield site. One example is the retention and conversion of the Listed Moyana Building. The form and layout of the building is such that it will not be straight forward to convert and it may lend itself better to conversion, both in terms of viability and design, to either a different form of residential use or to non-residential use which is compatible with the wider redevelopment of the site, such as a hotel.

To ensure that the allocation provides sufficient flexibility to enable a viable and successful redevelopment of the site which maximises its development potential we request that the wording is amended to:

*Proposed Use: Residential (including C2 and C3) or other compatible uses (e.g. Hotel (C1)).*

## **Indicative Capacity**

The Indicative Capacity for the allocation is set to 100 dwellings. This follows initial work to inform the SHLAA submission document and within this it was indicated that further capacity work would be undertaken to fully understand the potential of the site. This work is underway and it is hoped that the results will be available to share with the Council in the New Year. The additional work on the potential capacity of the site is suggesting that the indicative capacity should be raised to 150-200 dwellings. Variations depend on how the Listed Building is converted, the types of residential properties which are delivered at the site and heights (for which the allocation allows for up to 4-storeys).

To take account of this additional work we request that the indicative capacity of the site is increased to 150-200 dwellings.

## **Site Boundary and Site Area**

In considering its future requirements for the Warsash Maritime Academy Lower Site, the University intends to retain the site of the MOS building which is currently shown as forming part of the draft allocation. Retaining the access road to the south of the MOS building, will allow the University to have a dedicated access to the Lower Campus.

We request that the allocation boundary is amended to remove the site of the MOS building and the access road. The “Educational Facility outside the Urban Boundaries” designation should then be extended to cover the site of the MOS building and access road.

When the University disposes of the Upper Site an area of land to the west of the built development on the Upper Site which is no longer required for academic purposes will also be included. To make it clear that this will no longer form part of the campus the draft allocation should be extended westwards into this part of the campus so that it is removed from the designation ‘Educational Facilities outside the Urban Boundaries’.

These suggested changes are shown in Appendix 1.

As a result of the amended boundary the area of the allocation will increase from 2.5ha to 2.94ha.

## **Detailed Allocation Criteria**

### ***Part A***

As noted above, the indicative site capacity of the site should be increased to 150-200 dwellings.

The allocation notes that the Listed Buildings will be converted to a residential use. We seek further flexibility in the allocation to allow conversion to “other compatible uses” which the buildings may be better

suited to. The NPPF is clear that when considering the future of Listed Buildings weight must be given to the 'optimal viable use'.

SSU requests that the wording is amended to:

*"The quantum of housing proposed shall be broadly consistent with the indicative site capacity, which is based on both new development and the conversion of the existing statutory Listed Buildings to an optimal viable use which may comprise residential or other compatible uses;"*

## **Part B**

SSU supports the requirement for primary highway access to be focused on Newtown Road. The University will require adequate access to be maintained to the Lower Site of the campus and it is anticipated that this will be achieved through the retention of the existing access to the north of the site within the University's ownership and control, as outlined above. It would be appropriate for the allocation site to be accessed independently from the retained Lower Site.

## **Part C**

SSU supports the 4-storey limit on the height of new buildings which may be brought forward as part of the redevelopment of the site. Whilst the scale of residential buildings to the east of Newtown Road is smaller, the existing WMA Upper Site has its own distinct character with a number of four storey buildings including the Blythe, Admiral Jellicoe and Whalley Wakeford buildings alongside the five storey Shackleton block. The ability to replace existing buildings with new buildings of up to four storeys will allow a higher density of development to be achieved without compromising the environmental quality of the site.

## **Part D**

SSU supports the principle of providing pedestrian and cycling facilities. The extent of the connection to 'nearby facilities and services' will be considered as part of a future planning application. Therefore, the wording should be amended to read:

*"...as well as providing connectivity with nearby facilities and services, the extent of which will be considered as part of a future planning application".*

## **Part E**

SSU supports the requirement for the site frontage on Newton Lane to be well-landscaped. The wording should not, however, be interpreted as a requirement for landscaping to 'hide' or entirely screen the development. The site does benefit from some existing landscaping to the Newtown Road frontage but existing built development is clearly visible and forms part of the character of the local area.

## **Part F**

SSU supports the requirement for a Heritage Statement to be submitted with a future planning application to assess the impacts of development on the Listed Buildings.

## **Part G**

SSU recognises that it will be necessary to secure the future use of the Listed Buildings linked to the implementation of the development of the wider site. Because the Listed Buildings are Listed at Grade II, as opposed to Grade II\* or Grade I, Historic England may not wish to be extensively involved. Therefore, it should not be a prerequisite that Historic England's agreement is required. In bringing a planning application forward they will of course need to be consulted and the policy should be re-worded to reflect this.

SSU supports the wording which states ‘deliver an appropriate re-use of the listed buildings’ as this recognises that a conversion to residential dwellings may not be the most appropriate or viable use. The wording of the rest of Part G should be amended to reflect our above comments regarding the proposed use of the site. SSU requests that Part G is amended to read:

*“There is a binding agreement that will deliver an appropriate re-use of the listed buildings (subject to **consultation** with Historic England) within a phased programme of works linked to the delivery of residential development **or other compatible uses**;*”

Where the draft policy refers to “a binding agreement”, this should not be taken to refer to a legal agreement under s.106 of the Town and Country Planning Act, the re-use of the Listed Buildings could be secured by the imposition of a planning condition.

## **Part H**

It is important that efforts are made to incorporate the best quality trees into a future development proposal, however, SSU objects to the requirement for all trees on the site to be retained.

Area Tree Preservation Orders are recognised to be a ‘blunt-tool’ in dealing with tree protection. Moreover, the Area Tree Preservation Order which is imposed upon the site dates from 1993. As part of its work to assess the development potential of the Upper Site the University has commissioned an updated Tree Survey of the entire Campus. Once this has been completed that University will seek to meet with the Council with a view to reviewing and refining the Area Tree Preservation Order such that it identifies and protects the most important trees on both the Lower and Upper Sites.

SSU requests that the wording of Part H is updated to require the retention of only the most important trees.

## **Part I**

SSU supports the requirement for boundary trees and hedgerows on the western boundary to be retained and incorporated within the design of the development in order to provide a buffer to priority habitats.

## **Part J**

Part J should be removed as the requirement to consider Coastal Change Management Areas is set out within draft Policy NE4.

## **Part K**

We agree that it is reasonable to require development to fund the infrastructure needed to support it or mitigate any adverse impacts it directly creates. It should be noted that the Warsash Martine Academy is a brownfield site, meaning that it has an existing use which has a baseline impact on infrastructure. Furthermore, there will be significant costs associated with preparing the site for development in comparison to a greenfield site. The retention and reuse of the Listed Buildings will also give rise to additional costs in bringing the site forward. When calculating the contributions towards infrastructure required from a future development, regard should be had to these points to ensure that it is viable.

We request that the wording is amended to:

*“Where appropriate and not covered by CIL, 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 public open space (in accordance with the Council's Planning Obligations SPD).*

*Consideration will be given to abnormal costs associated with the redevelopment of this brownfield site and the reuse of Listed Buildings to ensure future development remains viable. Similarly, the impact of the existing or lawful use of the site on local infrastructure will be considered when calculating additional infrastructure requirements for its redevelopment"*

## The Proposals Map

We request the following revisions are made to the Proposals Map to reflect our comments above:

- MOS Building and existing access removed from the draft allocation;
- Education Facility Outside the Urban Area designation extended to cover the retained MOS Building and existing access; and
- Draft allocation extended westwards to incorporate additional land which will be marketed with the Upper Site.

These changes are shown on the plan at Appendix 1 of this letter.

## Draft Local Plan Policies

In addition to commenting on the proposed allocation of the Upper Site we wish to comment on several draft policies which could impact upon bringing the allocation forward for development. These policies are:

- Policy H1 Strategic Housing Provision;
- Policy H7 Self and Custom Build Homes; and
- Policy NE3 Solent Special Protection Areas.

### ***Policy H1 Strategic Housing Provision***

Policy H1 sets out a requirement of 11,300 net additional dwellings to be delivered within the 24 year plan period between 2011/12 – 2035/36.

This figure is underpinned by the Spatial Position Statement (June 2016) (SPS), produced by the Partnership for Urban South Hampshire (PUSH), which is in turn informed by the Objectively Assessed Housing Need Update (April 2016) (OAHNU).

This evidence has been produced at the sub-regional level for the constituent authorities of South Hampshire. This underlines the importance of ensuring that it is up-to-date, robust and properly scrutinised, including through the Local Plan examination. Fareham is responsible for ensuring that this work is updated to inform its plan making, if it is to be found sound.

The Objectively Assessed Housing Need Update report concludes that 116,400 dwellings (4,850dpa) are required in the sub-region in the period 24 year plan period 2011/12 to 2035/36. For Fareham Borough the OAN is 420 dpa. This is split between the Portsmouth (East) and Southampton (West) Housing Market Areas (HMA) where this is identified need for 305dpa and 115dpa, respectively.

Planning Practice Guidance (PPG) indicates that local needs assessments should be informed by the latest available information (Paragraph: 016 Reference ID: 2a-016-20150227). The OAHNU is based on the out of date 2012-based subnational population projections (SNPP). The OAHNU acknowledges that there is likely to be an increase in population projections to higher net migration, and has sought to account for this by using data in the mid-year population estimates. However, now that the new baseline demographic data is available (2014-based SNPP) the report should be updated. The 2014 SNPP for Hampshire County are showing an increase in population across all age groups. Although this covers a wider area, it is probable that the same pattern will be evident in South Hampshire.

To arrive at expected household growth the headship rates set out in the 2012-based CLG Household Projections are applied. This data has since been superseded by the 2014 Projections. Notwithstanding, Figures 12 -15 of the OAHNU show a clear reduction in formation rates between the 2008 (pre-recession) and 2011/12 data for the younger age cohorts, particularly those aged 25-34. The report indicates that there is no suggestion of any suppression in this age group either in the past or projected forward (para 2.79). However, we would dispute this assertion and suggest that the application of 2012 headship rates will suppress housing need. The PPG advises that it may be appropriate adjust household formation rates to avoid carrying forward past suppressed trends. As such, it is considered that the 2008 headship rates would be a more appropriate.

The National Planning Policy Framework (paragraph 47) is clear that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF.

The recently published Government consultation on Local Housing Need suggests increasing the housing requirement for the Borough from 452dpa (average) as set out in DLP, to 531dpa as per the Government requirement (not including any duty to co-operate uplift).

Although this proposal is still at consultation stage, it is important that the Council is aware of its implications, and the potential for further supply to be identified to meet needs. The DLP should be sufficiently flexible to meet this uplift should the Government take the proposals forward.

### ***Policy H7 Self and Custom Build Homes***

This policy does not give adequate consideration to sites where the delivery of self or custom build homes might not be appropriate or feasible, for example sites containing Listed Buildings or sites where the form of development anticipated (e.g. apartments in 4-storey buildings) militates against self or custom-build homes. The policy should seek self and custom build homes where appropriate rather than require 5% provision from all sites providing 100 dwellings or more.

We request that the wording of this part of the policy is amended to:

*Where appropriate in the context of the form, and scale of development proposed, on sites of 100 dwellings or more (gross), 5% of the overall dwellings **should** be provided through the provision of serviced plots for self or custom build need.*

### ***Policy NE3***

We recognise the need to provide adequate protection for Special Protection Areas and to mitigate Cumulative Effects of residential development. However, consideration should be given to the existing use of sites (both residential and other) where the existing development currently has, or has potential to have, an impact on the SPA. The impact of existing uses should be taken into account when considering the

mitigation to be requested from residential re-development and should be factored in to any request for mitigation contributions as a result of development.

We thank the Council for this opportunity to comment on the Draft Local Plan and look forward to further dialogue.

Yours sincerely

Tom Stocker  
**Senior Planner**



## Appendix 1: Site Plan





## Respondent details:

Title:	
First Name:	Unknown1
Last Name:	Unknown1
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	Yes

### Please provide details you have to support your answers above

Para 1.5 Introduction: Statement of Community Involvement and further 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.

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

The LPA should make another attempt to achieve a reasonable level of Community Involvement

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

Allow for public opinion to be expressed through the appropriate channels and provide a mechanism for evidence collected by residents groups to be equally considered as that from Developer's consultants and associates

### Your suggested revised wording of any policy or text:

The LPA will hold another Public Consultation on the Plan during the Summer of 2021 where their views and concerns can be properly considered

**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: 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**

Policy HA1: 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. 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? Developers have taken advantage of the LPA's decision to propose HA1 within (the now defunct) 2017 Plan and have submitted Applications that the LPA have resolved to grant permission on (many ahead of and likely contrary to) the Publication Plan. Others claiming their sites fit well with HA1 has now resulted in the boundaries of HA1 being adjusted to accommodate them. This seems to mark an inappropriate powershift toward the Developers.

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

HA1 needs to be re-evaluated from the point of view of reducing overall number of dwellings (by conducting an OAN on the Warsash area alone). The Plan must also ensure a "joined up" approach is taken to the many Developers sites and the CUMULATIVE effects caused rather than the current piecemeal "Salami-Slicing" approach

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

HA1 would be properly re-assessed (starting from the point of the Extant 2015 Plan numbers and not the unadopted abandoned draft plan of 2017)

**Your suggested revised wording of any policy or text:**

HA1 will be re-assessed in the light of confirming the Objectively Assessed Housing Need in Warsash and the Western Wards and any Allocation sites will be considered both individually and as a whole to ensure the Cumulative effects on the infrastructure and environment are properly 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)?**

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

---

## 3) 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**

Para 9.10 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 LPA must ensure that mitigation of eutrophication complies with the directive to REDUCE overall Nitrate Levels and that inline with Natural England Advice that protected sites (SAC, SPA, RAMSAR) are not compromised because simple broader-region off-setting has been used as opposed to Local Mitigation of effects on those sites

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

The Plan would become consistent with Advice From Natural England and the Habitats Directive

### **Your suggested revised wording of any policy or text:**

Sites will be allowed where Nitrate Reduction mitigation can be proven at a local area level

### **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: 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**

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?**

Greenfield Sites will be assessed in their own right and Settlement Boundaries shall not be altered to include large proposed Housing Allocations until the Objectively Assessed Housing Need for the immediate vicinity have been considered. Similarly no redesignation of Greenfield sites to Urban status shall be allowed until OAHN can be proven to justify this.

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

Remove changes to Settlement Boundary as indicated in WW17 and apply Greenfield Site aspirations to HA1

**Your suggested revised wording of any policy or text:**

HA1 is in the Countryside and as such any consideration of Housing Allocation should conform with the Policies for Development in the Countryside and the Aspirations of the LPA to maintain such areas as a last resort for Development

**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: DS1 - Development in the Countryside**

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

**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?**

Do not redraw the Settlement Boundary in WW17 and exclude HA1 as it does not meet requirements of DS1

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

Would then comply with DS1 and HP1

**Your suggested revised wording of any policy or text:**

HA1 is in the Countryside and outside Settlement Boundary. It does not meet the requirements of existing dwelling replacement in HP1 and therefore should not be considered for allocation without meeting the further requirements for development in the Countryside

**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: HP4 - Five-year Housing Land Supply**

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

**Please provide details you have to support your answers above**

Policy HP4 (Para 5.24) HA1 fails to meet criteria e) as the proposal would demonstrably have unacceptable environmental, amenity and traffic implications.

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

Re-Assess HA1 in respect of being outside the Urban settlement and in terms of OAHN and Local Sustainability from an amenities and infrastructure perspective

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

It would ensure that Development in the Countryside is only considered with the requirements set forth in the relevant Policies and that any allocation proposed is locally sustainable through the addition of amenities and infrastructure to support the number of new dwellings proposed.

**Your suggested revised wording of any policy or text:**

HA1 Allocation needs to be re-evaluated to ensure the appropriate amount of infrastructure and amenities are delivered before any Development begins

**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: HA1 - North and South of Greenaway Lane**

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

**Please provide details you have to support your answers above**

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

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

A full Local Transport Assessment needs to be conducted for the routes serving HA1

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

It would ensure that traffic and safety implications of an additional 830 dwellings in a relatively compact area have been properly considered

**Your suggested revised wording of any policy or text:**

The LPA will carry out a Full Local Transport Assessment for HA1 to determine the flow of traffic and congestion cause through the additional 1600 vehicular movements each day. In particular the safety of Brook Lane will be reviewed in the light of the "Pinch point" just beyond the School, which is on a blind corner and likely to result in injury or fatality, either from a head on collision or a vehicle striking a pedestrian from having to mount the kerb.

**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: 10.15**

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



**Please provide details you have to support your answers above**

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.

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

A full local Transport Assessment will be conducted for the routes serving HA1

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

It would ensure it was Positively prepared by taking into account the challenges of increased vehicular movements caused by HA1

**Your suggested revised wording of any policy or text:**

The LPA will conduct a full and thorough Local Transport Assessment to determine any traffic and safety issues created by HA1 and will ensure that the appropriate mitigation has been agreed before any allocation is approved.

**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) Policy: HA1 - North and South of Greenaway Lane**

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

**Please provide details you have to support your answers above**

Para 14.6 of Final Transport Assessment 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 Transport Plan document.

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

The Transport Assessment has only been done at the Macro level (Strategic) and not local level - Need a detailed Transport Assessment for HA1

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

It would ensure that the appropriate mitigation is in place for the additional traffic created by an extra 830 dwellings in the local area

**Your suggested revised wording of any policy or text:**

The LPA shall conduct a detailed Local Transport Assessment for HA1 before an allocation is approved

**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) Policy: HA1 - North and South of Greenaway Lane

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

### Please provide details you have to support your answers above

Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan?

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

Include on the Masterplan where the two junior football pitches are proposed

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

The Masterplan would be made consistent with Policy HA1

### Your suggested revised wording of any policy or text:

Two Junior football pitches to be shown on the masterplan

### 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: 3.27

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

### Please provide details you have to support your answers above

Para 3.27 fig 3.2 There are actually more than the indicated 8 potential growth areas shown on the map (assuming that these are construed as being the proposed allocations). This needs correction.

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

Either change the number of potential growth areas or modify the Map to be consistent with the figure of 8

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

It would be consistent

### Your suggested revised wording of any policy or text:

Update the Map or change the number (8) mentioned in Para 3.27

### 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

---

## 12) Paragraph: 3.37

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

**Please provide details you have to support your answers above**

Para 3.37 is in conflict with Para 4.13 over the definition of small-scale development – is it sites of less than 1 Ha or development of not more than 4 dwellings?

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

Ensure the numbers are the same in both Paras

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

It would be consistent

**Your suggested revised wording of any policy or text:**

Change either Para 3.37 or 4.13 to make them consistent

**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:	
First Name:	Unknown2
Last Name:	Unknown2
Job Title: (where relevant)	
Organisation: (where relevant)	
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

Para 4.2 of the Publication Plan is unsound because it bases housing numbers on a proposed new methodology for calculating need and there is a tangible risk that it may not be adopted by the government. In addition 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.

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

The LPA should wait until Government has confirmed the methodology for calculating OAHN

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

It would ensure the Plan is consistent with Government Policy

### Your suggested revised wording of any policy or text:

The LPA will defer any allocations until the Government has confirmed the Methodology for calculating OAHN

### 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: 5.41

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

**Please provide details you have to support your answers above**

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.

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

Review to provide a more reasonable level of occupancy for Dwellings when determining Nitrate budgets

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

It would make the Plan more realistic in terms of the real average occupancy levels in the Housing proposed locally

**Your suggested revised wording of any policy or text:**

The Nitrate budget calculations should be undertaken with respect to average occupancy rates in the area (The Council's own figures for Affordable homes is between 4 and 6 people per dwelling and not 2.4 - So the number should probably be in the region of 3-4 at a minimum.

**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: CC4 - Renewable and Low Carbon Energy

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

**Please provide details you have to support your answers above**

Para 8.6 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.

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

Ensure that the Plan includes emission reduction Targets in order to meet or exceed the levels that can contribute to the Governments overall Carbon reductions.

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

It is not sufficient to just require Developers to meet/exceed current Building Regulations when their are no specific percentage reductions mentioned



**Your suggested revised wording of any policy or text:**

The LPA will allow Developments when it has been calculated that the local carbon emissions generated by the site has been reduced by x% and that the site conforms with Government Policy SAP 10

**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: 7.13**

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

**Please provide details you have to support your answers above**

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.

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

Assessment of LOCAL amenities including Retail floorspace

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

It would contribute to making the developments Sustainable

**Your suggested revised wording of any policy or text:**

Any allocation must be justified in terms of the number of Dwellings proposed, by a review of the strain on Local Amenities and Infrastructure. If either is assessed to be inadequate, Allocation will not be approved until such local infrastructure/amenities have satisfied the assessed needs of the 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

---

**5) Paragraph: 7.18**

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

**Please provide details you have to support your answers above**

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?**

A review of Local Shopping needs (vs Out of Town) is needed before any allocations are made

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

Will contribute to Sustainability by cutting down on vehicular movements and adding to local employment numbers

**Your suggested revised wording of any policy or text:**

Before any allocation is approved the LPA will assess the Local Retail and Shopping facilities to minimise the need for vehicular trips, provide for local employment and contribute to the Sustainability of such 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

---

**6) Policy: TIN4 - Infrastructure Delivery**

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

**Please provide details you have to support your answers above**

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.

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

Include child placements forecast to 2037 (not 2021) and review the EYP numbers for 1000 new dwellings proposed in Warsash

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

Would cover the Plan duration and reflect a reasonable demand based on the actual number of new Dwellings (83 placements is obviously too low!)

**Your suggested revised wording of any policy or text:**

The Child Placements and EYP up to 2037 will be assessed and Schools extensions funded and planned accordingly to accommodate the increased Educational needs of the 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

---

**7) 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**

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.

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

Need to commit to appropriate increase in local doctors and dentists (healthcare needs)

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

Make it relevant to current and future needs (not based on historic data) and be sufficient to support the additional 1000 dwellings proposed for Warsash

**Your suggested revised wording of any policy or text:**

Local Healthcare facilities will be assessed and committed to, using future predicted demand from over 1000 new dwellings in the Warsash 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:	
First Name:	Unknown3
Last Name:	Unknown3
Job Title: (where relevant)	
Organisation: (where relevant)	
Address:	
Postcode:	
Telephone Number:	
Email Address:	

## 1) Paragraph: 1.28

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

### 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?

State that the final figures for Housing need in the Borough, including adjacent councils will be available once the new government methodology has been confirmed

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

The basis for Housing numbers would be supported by an accepted methodology rather than a proposed one

### Your suggested revised wording of any policy or text:

Only PROVISIONAL figures for Housing needs are available in this Plan. The LPA will be able to provide final figures once the new methodology for calculation of OAHN is confirmed by the Government

### 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: 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**

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?

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

A full decision needs to be made regarding the Stubbington Gap status

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

To include a consultation with Council Officers in order to decide on whether or not to "rewild" the Stubbington Gap

**Your suggested revised wording of any policy or text:**

The Stubbington Strategic Gap will be the subject of a Consultation by Council Officers. A decision over how allocations may be allowed in this area versus a complete "rewild" exercise will be concluded.

**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: CC2 - Managing Flood Risk and Sustainable Drainage Systems

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

**Please provide details you have to support your answers above**

The Publication Plan does not consider the risk of Groundwater Flooding in the vicinity of HA1

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

The Council needs to carry out a Groundwater Flooding assessment in the vicinity of HA1

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

GroundWater Flooding (Different to Surface Water and Fluvial flooding) is an insidious threat which involves the gradual heightening of the water table until finally Ground Water seeps into properties and into the drainage system, causing major source of Flooding and Pollution. Including the threat of concentrated Nitrates leeching into the Solent.

**Your suggested revised wording of any policy or text:**

The LPA will conduct a thorough investigation of the potential for Groundwater flooding in the vicinity of HA1 and produce a mitigation plan to avoid any such instance from occurring due to the additional load created by the 830 Dwellings being proposed.

**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:	Charlotte
Last Name:	Varney
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

1) Paragraph: 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**

The map boundaries for the Warsash area have been moved post the planning. This is not legal, sound or compliant with a duty to cooperate.

Para 1.5 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. Community Involvement 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?**

Return to original boundaries

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

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

Return to original boundaries would be the correct thing to do.

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.

## Your suggested revised wording of any policy or text:

I am not a legal expert and therefore suggest the people who wrote the policy make the correct amendments

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.

## 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: 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

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! Housing Allocations 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. 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? Developers have taken advantage of the LPA’s decision to propose HA1 within (the now defunct) 2017 Plan and have submitted Applications that the LPA have resolved to grant permission on (many ahead of and likely contrary to) the Publication Plan. Others claiming their sites fit well with HA1 has now resulted in the boundaries of HA1 being adjusted to accommodate them. This seems to mark an inappropriate powershift toward the Developers

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

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?

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

Developers have taken advantage of the LPA’s decision to propose HA1 within (the now defunct) 2017 Plan and have submitted Applications that the LPA have resolved to grant permission on (many ahead of and likely contrary to) the Publication Plan. Others claiming their sites fit well with HA1 has now resulted in the boundaries of HA1 being adjusted to accommodate them. This seems to mark an inappropriate powershift toward the Developers.

### **Your suggested revised wording of any policy or text:**

Developers have taken advantage of the LPA's decision to propose HA1 within (the now defunct) 2017 Plan and have submitted Applications that the LPA have resolved to grant permission on (many ahead of and likely contrary to) the Publication Plan. Others claiming their sites fit well with HA1 has now resulted in the boundaries of HA1 being adjusted to accommodate them. This seems to mark an inappropriate powershift toward the Developers.

### **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: 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**

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 Carbon Reduction 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

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

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 Carbon Reduction 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

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

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 Carbon Reduction 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

**Your suggested revised wording of any policy or text:**

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 Carbon Reduction 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

**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: 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**

Para 9.10 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?**

Para 9.10 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.



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

Para 9.10 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.

## Your suggested revised wording of any policy or text:

Para 9.10 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.

## 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: 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

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. 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?

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. 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

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

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. 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

### Your suggested revised wording of any policy or text:

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. 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

### 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: 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**

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. 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. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan

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

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. 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. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan

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

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. 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. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan

**Your suggested revised wording of any policy or text:**

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. 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. Policy HA1: Page 52 indicates the need for the provision of "2 junior football pitches" Why are these not shown in the Masterplan

**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: 3.27**

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

**Please provide details you have to support your answers above**

Para 3.27 fig 3.2 There are actually more than the indicated 8 potential growth areas shown on the map (assuming that these are construed as being the proposed allocations). This needs correction. Housing Need Methodology Para 3.37 is in conflict with Para 4.13 over the definition of small-scale development – is it sites of less than 1 Ha or development of not more than 4 dwellings? Para 4.2 of the Publication Plan is unsound because it bases housing numbers on a proposed new methodology for calculating need and there is a tangible risk that it may not be adopted by the government. In addition 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.

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

Para 3.27 fig 3.2 There are actually more than the indicated 8 potential growth areas shown on the map (assuming that these are construed as being the proposed allocations). This needs correction. Housing Need Methodology Para 3.37 is in conflict with Para 4.13 over the definition of small-scale development – is it sites of less than 1 Ha or development of not more than 4 dwellings? Para 4.2 of the Publication Plan is unsound because it bases housing numbers on a proposed new methodology for calculating need and there is a tangible risk that it may not be adopted by the government. In addition 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.

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

Para 3.27 fig 3.2 There are actually more than the indicated 8 potential growth areas shown on the map (assuming that these are construed as being the proposed allocations). This needs correction. Housing Need Methodology Para 3.37 is in conflict with Para 4.13 over the definition of small-scale development – is it sites of less than 1 Ha or development of not more than 4 dwellings? Para 4.2 of the Publication Plan is unsound because it bases housing numbers on a proposed new methodology for calculating need and there is a tangible risk that it may not be adopted by the government. In addition 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.

### Your suggested revised wording of any policy or text:

Para 3.27 fig 3.2 There are actually more than the indicated 8 potential growth areas shown on the map (assuming that these are construed as being the proposed allocations). This needs correction. Housing Need Methodology Para 3.37 is in conflict with Para 4.13 over the definition of small-scale development – is it sites of less than 1 Ha or development of not more than 4 dwellings? Para 4.2 of the Publication Plan is unsound because it bases housing numbers on a proposed new methodology for calculating need and there is a tangible risk that it may not be adopted by the government. In addition 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.

### 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: 5.41

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

### Please provide details you have to support your answers above

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.

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

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.

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

Make the numbers reasonable and recalculate the proposal realistically

### Your suggested revised wording of any policy or text:

Use occupancy rates of 4-6

### 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: 8.6



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

**Please provide details you have to support your answers above**

ara 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

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

ara 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

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

ara 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

**Your suggested revised wording of any policy or text:**

ara 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

**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: 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**

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

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

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

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

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

**Your suggested revised wording of any policy or text:**

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

**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: 11.36**

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

**Please provide details you have to support your answers above**

ara 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

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

ara 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

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

ara 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

**Your suggested revised wording of any policy or text:**

ara 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

**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

---

**12) 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**

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

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

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

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

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

### **Your suggested revised wording of any policy or text:**

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

### **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

---

## **13) 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**

ara 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.

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

ara 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.

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

ara 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.

**Your suggested revised wording of any policy or text:**

ara 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.

**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

---

**14) 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**

ara 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..

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

ara 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..

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

ara 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..

**Your suggested revised wording of any policy or text:**

ara 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..

**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

15) 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?**

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.

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

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.

**Your suggested revised wording of any policy or text:**

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.

**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



What type of policy is this representation about?	Which Policy?	Which part of the policies map?	Legally compliant?	Sound	Complies with the duty to co-operate	Please provide details you have to support your answers	What modification(s) is necessary to make the Local Plan legally compliant or sound?	How would the modification(s) you propose make the Local Plan legally compliant or sound?	Your suggested revised wording of any policy of text	If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?
Housing Allocation Policies	HA4 - Downend Road East		Yes	No	Yes	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	recognition and commentary (which may include a policy amendment) on the Agent of Change principle within the plan generally and more specifically policy HA4.	by complying with national policy direction (NPPF).	For policy HA4 amend (h) to include reference to Agent of Change. Also look to have generally commentary within the plan.	Yes, I want to take part in a hearing session, 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.

						<p>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</p>				
--	--	--	--	--	--	---	--	--	--	--

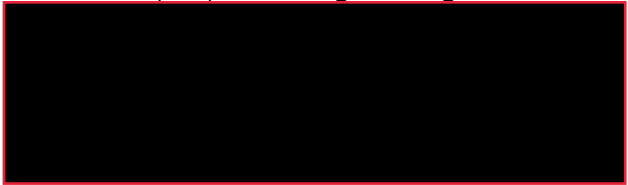
						referenced in the plan generally or policy HA4, in respect of the agent of change and impact of residential encroachment on existing uses (incl Waste). Encroachment by sensitive development such as housing has the potential to create real issues for the ongoing operations on existing waste sites. While 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				
--	--	--	--	--	--	--	--	--	--	--

						<p>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</p>				
--	--	--	--	--	--	--	--	--	--	--

						growth on our site boundaries (Housing Allocation HA4) without these policy safeguards in place as it is not consistent with national policy direction.				
--	--	--	--	--	--	---	--	--	--	--

11/12/2020 Veolia response submitted via the survey form

Mr Simon McKee  
Southern (UK) Planning Manager





**Respondent details:**

Title:	Mrs
First Name:	June
Last Name:	Ward
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**

I do not think I have had access to a variety of methods from which to comment. Had to ring up and get a copy of Fareham today which took a week to come. I think to the layman a lot of the language used is very contradictory and misleading i.e. "tests of soundness" does not seem to add up to FBCs Legal compliance and Duty to cooperate. The community have tried to become involved but everything that we have done deputations, objections and protest marches have been denied..

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

More weight appears to be given to the developers rather than to the residents. I am totally opposed to the nitrates budget calculations and consider this needs to be challenged.

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

I think that the residents would consider that their concerns have not been taken into account and our opinions appear to be negated.

**Your suggested revised wording of any policy or text:**

The plan does not meet the legal requirements as the community has been disenfranchised.

**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):**

Because it is my right to hear exactly what arguments are put for and against.

## 2) Paragraph: 1.6

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

### **Please provide details you have to support your answers above**

No joined up thinking for HA1; developers have been allowed to work in isolation, so the area is dotted with developments with no thought of the environmental impact. There should be another Environmental impact assessment to show what this will mean if it was all carried out.

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

No mention made of the 2017 an unadopted draft plan because the planning authority allows for housing sites which had previously been allocated in an extant local plan.

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

It would appear that everything leans towards the developers as more and more land appears to have been gobbled up by them. And as everything is being looked at in isolation you cannot get a coherent view of how this once agrarian landscape is being swamped by housing.

### **Your suggested revised wording of any policy or text:**

I do not consider the plan to be effective as it does not take into account the reasonable alternatives available within the Fareham district.

### **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):**

Legal right as feel disenfranchised.

---

**Keely, Lauren**

---

**From:** June Ward [REDACTED]  
**Sent:** 10 December 2020 15:39  
**To:** Consultation  
**Subject:** Fwd: FBC Continued  
**Attachments:** FBC Continued .docx

For the attention of Katherine Trott

Begin forwarded message:

**From:** June Ward <[REDACTED]>  
**Date:** 6 December 2020 at 22:28:00 GMT  
**To:** June Ward [REDACTED]  
**Subject:** FBC Continued

Dear Katherine,

As discussed with you Friday 4 December I enclose the start of my comments on the consultation document which you said you would be able to put in the appropriate boxes as I am unable to as I found that I could not continue without logging on, each time which was not how the system should've worked.

When we spoke you said that you had not received the second paragraph that I submitted so I am hoping that I will start there, as you have already received my first submission.

As I am not able to view the pro forma I hope you will be able to put them into the correct boxes as obviously with only one iPad that I am using to work on and one for my notes which I have made, it would be too torturous.

So onto matters of legal compliance which I believe is paragraph 1.6

There is no mention of the 2017 unadopted draft plan although it has been confirmed that it was in the previous 2015 plan.

Although there was an overall reduction in the new housing it would appear that Warsash is actually going to take 20% more. HA1 has no joined up thinking. There should be an environmental impact on all of the sites proposed , so that each one is not seen in isolation.

Paragraph 4.19 states that many of the housing policies brackets HE256 811 1416 1820 2125 and no longer considered to be proposed allocations. I should like to know how objectively assessed housing need arrived at the fact that site HA1 was to take the bullet.

It would appear that the developers have taken advantage of the LPA's decision that proposing HA1 would mean that they have carte blanche to submit applications. I believe this is contrary to the publication plan. It would also appear that in order to fit in as many houses as possible into HA1 the boundaries have been adjusted to accommodate them. How does this not look as though the Developers have the upper hand and are actually driving this through.

So onto the Habitats directive which again comes under Matters of legal compliance.

Paragraph 9.10 is about nightrates neutrality strategic policy. I cannot see how the policy which requires designated sites to be protected and enhanced and improved is adhered too. I think the word I am looking for is there should be a net reduction the designated sites in unfavourable conditions. The LPA's way of adjudging is the exact opposite. It would appear that this is in direct contravention of both the habitats directive and the publication plan policies. The developments contemplated would be negatively impacting the SAC and RAMSAR sites. I cannot see that under these circumstances it would be a valid option.

I am calling it a day at present and wonder if you can reply to acknowledge receipt of this and that I am actually doing the right thing and making comments that you can import into the documentation,

Many thanks,

June Ward



Dear Katherine,  
This next part of my document relates to the Test of Soundness

I am not at all happy with the settlement definition.

Policy HA1, which is supposedly a greenfield site is proposed to be changed to an urban area – via the redefinition of settlement boundaries reference WW 17. Greenfield sites are not particularly favourable for development as it says in the forward to the publication plan.

Paragraph 2.10 says that Fareham Borough aims to retain the identity of the amazing valuable landscape and settlement definition, protecting it's natural, built and historic assets. As someone who has lived in Warsash 45 years and been conversant with this area for nearly 10 years before that, ie the late 1960's, is a complete contradiction. What was once a very gentle countryside location seems to have been redesignated giving it up and status. And the change of the settlement boundary to enable this to happen is in my view completely unethical and beyond belief. I take exception to the fact that policy HP1 calls for the efficient use of existing buildings to meet such need on a 1 for 1 replacement dwelling basis. This is not applicable for HA1 and it would appear that FBC has managed to redraw the urban boundary.

My next comment on test of soundness is where infrastructure is concerned.

This concerns policy HP4 to be found paragraph 5.24; I think HA1 demonstrably fails to have any thing other than a detrimental effect on the environment, certainly the traffic (witness the two and a half hours to get off the motorway on Friday 4 th December, where all roads in and out of Warsash were snarled up, as we are a peninsula....or has this not occurred to anyone) and amenity has implications. Even now I feel that I cannot venture out too far from Warsash for fear of not getting back at a reasonable time due to the amount of traffic on the few roads in and out of Warsash. Warsash almost appears to be a prison! Don't go anywhere because you can't get back to your house!

This ties in with my next point policy HA1. Page 51 talks about traffic routes. As I have said earlier it almost feels that one is imprisoned in Warsash. I note that there was a recommendation that there should only be six dwellings and Greenaway Lane now I see that the plan proposes for 140 houses and that to enable this to be accessed the lane needs to be widened. I think the clue is in the word Lane. This is a delightful lane to walk through but with that amount of traffic proposed would be considerably dangerous. It is already "take your life in your hands to cross Warsash Road" let alone the impact of trying to walk within what was once considered countryside. As one gets older and appreciates the ability to be able to walk along country lanes. Page 54 suggests there should be seven new accesses onto an incredibly busy Brook lane and Lockswood Road as well as an additional iaccess at Brook Lane via three entry points from Greenaway Lane. I have already had to change my surgery where I was a patient for 40 odd years as it was impossible to get to the surgery on time due to the amount of traffic. My surgery is now in locks Heath Centre. I note that there was an occasion some time in the last few few weeks that the Air ambulance was unable to land; and ambulance was unable to get there because of the gridlock. My point is very much that the proximity of these access points and the position of such will cause even more gridlock. We are a peninsular we are hemmed in. More traffic will make us feel that we are even more in a cage.

Continuing with my other comments about infrastructure

Paragraph 10.15 where has that been an analysis of roads where the new houses are proposed. If we are considering 830 new dwellings what about the transport assessment for HA1. Although there could be an average of two cars per dwelling I know from experience that at one point, with our daughters coming and going from University, we had five cars in the driveway, which we could accommodate.....many of the new homes will not have this advantage, and extra cars will be accommodated on the roads.. how therefore is there no reference for the mitigation required to reduce congestion by 2037. Plan as presented failed the test of soundness by not being positively prepared in this respect. In this very Rural area one has to have access to a car to get anywhere, unless being confined to one's home is the way forward for FBC. I cannot see that paragraph 10.14 helps any of us.



I have had the pleasure of one of my family is moving closer to live with me in Warsash and the boys are very involved in outdoor activities so it was a joy that I saw there was provision of two junior football pitches however these appear to be missed off of the master plan?

Document 3 for FBC

Dear Katherine,

This relates to Test of soundness-

Housing need methodology

I think there is a disparity CE paragraph 3.27 figure 3.2. The map shows that there are eight possible growth areas when there are actually more than this. Could you confirm which is the correct one.

Again paragraph 3.37 does not align with paragraph 4.13 regarding the definition of small-scale development. In other words, is it sites of less than 1Ha or development of not more than four dwellings.

Again under the same heading; paragraph 4.2 of the publication plan is dubious as it bases housing numbers on the proposed new methodology for calculating need and there is some concern that this may not be adopted by the government. Also page 37 paragraphs 4.12, 4.16 and policy HP13 illustration says that the contingency barrier of 1094 has been made. I think the plan is very dependent that 4858 houses at Welbourne will be delivered.

Occupancy rates

Paragraph 5.41 states that a four or five bed house would have an average occupancy rate of 2.4 with regard to nitrate budget calculations. However it also states that the range of occupancy for affordable homes will be between 4-6 persons. This does not marry up with the claims in the publication plan for what the council needs and requires.

Carbon reduction

Paragraph 8.60 section 8 does not state what the target should be for the requirement of meeting CO2 emission targets. It simply refers to individual developments power generation. I would contend that the plan is not positively prepared.

Paragraph 11.34 does not state what the meeting of CO2 emission reduction targets should be. The plan just refers to individual developments power generation so again I contend that plan is not positively prepared.

Paragraph 11.36 no standards have been set for the developers to design for natural ventilation and green infrastructure. I cannot see how just meeting building regs, allies with the Governments needs to meet the promised carbon reduction. The council should lead by example by setting standards to ensure that developers are designing for sustainability. We need to look to the future using the new standards SA10.

Retail facilities

Paragraph 7.13 if Warsash is to have more houses then there will be additional retail facilities needed and with that will be the need for more parking spaces as many who have lived in this area for decades need to use their own transport for shopping, hairdressers, and many other facilities that this village has provided. It is already a job to cross the road from one side to the other and more cars to the area will make this even more impossible. There would need to be a crossing area to allow children to cross safely to get to the bus stop or to Brookfield School as well as the many elderly people who need to cross from one side to the other.

Paragraph 7.18 although out-of-town shopping is discussed it is not however defined. As one gets older one prefers to take ones custom to the local shops as driving is not so pleasurable. If we are to be encouraged to shop elsewhere this will increase the amount of traffic on our heavily congested roads.

Education

Paragraph 10.26 infrastructure delivery plan section 5.5. I note that education is planned with Hampshire county council however the period of any proposed extensions only covers to 2021. The plan however goes up to 2037. My grandchildren are already in three different schools within the area, two of which need cars. Offering houses to be developed but then not having school places it's not a sound approach to help to realise the dreams of future generations.

Paragraph 10.27 Infrastructure delivery plan table item 83 calls for section 106 provisions of additional early years foundation provision within the western wards. However H a one does not say if there is going to be a nursery or preschool within the proposed development area. There should be a child placement contribution to be allocated as there are over 1000 new houses being proposed for the Warsash area alone. Again If parents need childcare provision they would have to travel out of this immediate area in order to access provision; not at all ideal, adding to traffic chaos, length of time travelling to and from child care setting and not allowing children to make friendships with those who they might be at school with when they reach statutory age.

#### Healthcare

As regards Paragraph 10.26 the infrastructure delivery plan calls for the expansion of healthcare provision through further GP practices in the western wards. The document however only provides an historic timeline through dating the local plan. This is not a sound approach considering that HA1 will bring in additional 830 houses. It is already impossible to get an appointment at the nearest GP practice within a week.

Complies with duty to cooperate  
Housing need methodology

Paragraph 1.28 which agrees to take up the shortfall of homes from Portsmouth, numbering 847, would appear that FBC are taking a risk as the new methodology for calculating housing need has not been signed off by the Government. Also during this time of public consultation the housing delivery test will not be available

Paragraph 3.10 The rewinding of the Stubbington strategic gap was made without consultation with the council offices or elected members. It came via an announcement through a press release after the start of the full council meeting, which was in the process of debating this plan.

**Keely, Lauren**

---

**From:** Warsash Fishermen [REDACTED]  
**Sent:** 18 December 2020 17:01  
**To:** Consultation; Planning Policy  
**Cc:** Younger, Emma; Cutler, Nick; [REDACTED]  
Wootton, Gayle  
**Subject:** Warsash Inshore Fishermens Group response  
**Attachments:** FarehamPlanResponse 1.docx; Warsash Fishermen SEMS (Warsash Fishermen) (Warsash Fishermen) 1.docx

Dear Sirs

Please find enclosed our response to the Consultation on the Fareham Local Plan 2037. (File attached)

We also enclose a report prepared recently which outlines the effects of seaweed overgrowth in the local area which is related to our Response to the Fareham Plan.

sincerely

Steve Matthews

co-ordinator, Warsash Inshore Fishermen's Group

Steve Matthews

18-12-2020

Warsash Inshore Fishermen's Group



**RESPONSE TO CONSULTATION ON FAREHAM LOCAL PLAN 2037**

Dear Planning Team

I am responding on behalf of the local fishermen here at Warsash and Southampton Estuary to the Fareham Local Plan 2036 (Final version; [Publication Plan \(fareham.gov.uk\)](https://fareham.gov.uk/publication-plan)).

We have some serious issues regarding the Plan's ability to deliver sustainable housing development without guarantee of protection (beyond reasonable doubt) of certain marine ecosystems within the Solent European Maritime Site and without guarantee of positively enhancing local commercial fishing businesses.

Although the features and species listed under the Habitats Directive (Special Areas of Conservation and Special Protection Areas) have already been evaluated by both Natural England (NE) and the Environment Agency (EA) in the respective Habitats Regulation Assessments (SCA's/SPA's), there are clearly some significant **Assessment oversights and gaps in the evidence base** which are of direct relevance and concern to the local Fishing Industry and also, we would suggest, to the future viability of the Solent Oyster Regeneration Project (Blue Marine Foundation).

These assessment oversights mean that the Fareham Plan, if implemented as stands, will likely lead to and exacerbate environmental effects within the SEMS. The specific issues we raise regarding the existing overgrowth of red seaweed (also known colloquially as 'The Red Menace') have not been evaluated by NE or the EA or mentioned in the Fareham Plan's evidence base.

The Plan fails to pass the test of soundness, (paragraph 1.5) in that it is discriminatory in that community-generated evidence carries less weight than that provided by the Councils (and developers) statutory consultants. Furthermore, there has been no formal involvement from the Councils statutory advisers with local fishermen with regard to seaweed eutrophication and the effects of wider seaweed overgrowths on their local industry.

The Plan fails under section 9 Natural Environment:



Specifically, NE4 water Quality effects and likely fails under NE1, protection of local ecological network (regarding sandbanks within the SEMS).

Paragraph 9.16 states: *'Paragraph 174b of the NPPF states that the Plan should promote the conservation and enhancement of priority habitats, ecological networks and the protection and recovery of **priority species**. Development proposals within the Borough are therefore expected to contribute to achieving this objective.'*

Solent native oyster, *ostrea edulis*, is currently a priority species for regeneration (Blue Marine Solent Oyster regeneration project). Nutrient exacerbated growth of smothering seasonal red seaweed masses leads to a significant negative effect upon the spatfall of the native oyster (ref: Warsash Fishermen SEMS enclosed)

The Plan fails to pass the test of soundness, in that there is a question regarding its long-term effectiveness with respect to Nitrogen-Mitigation. This strategy has not been proven. There is doubt that the Local Planning Advice is applying the Natural England advice lawfully in this respect.

However, as we have outlined above, there is a systemic failure here in that NE have not thus far considered the wider environmental issues we have brought to their recent attention (by email letters) and outlined comprehensively in this letter and attached paper. **These represent the 'evidence gaps' mentioned previously.**

It is the duty of NE and other Statutory Consultees to provide relevant evidence, ***where gaps in the evidence base have become available during the Consultation process, (NE submission to the Council, 2020).***

**Para 9.5 of the Plan fails on the test of soundness.** It assumes the Mitigation policy will be effective throughout the SEMS. Although the Local Planning Authority (LPA) is aspiring to Nitrate Neutrality, paragraph 9.1 requires designated sites be protected and ENHANCED as well as Strategic Policy NE1. Additionally, Para 9.50 (Policy NE4) confirms: 'Planning permission will be granted where the integrity of the designated sites is maintained, having regard to the effect of nutrients on the designated sites arising from increased wastewater production'. SEMS is a designated site.

The Plan fails to include the likely increase in bacterial contamination of shellfish (within sand-gravel bank seabed features) from increased sewage overflows, not mentioned in the Plan.

Para 9.38 through to 9.43 of the Plan indicates that proposals for development should provide a biodiversity net gain (including enhancements). This cannot be guaranteed.

The Plan fails under Para 9.5, under Policy NE4: *'Planning permission will be granted where the integrity of the designated sites is maintained, having regard to the effect of nutrients on the designated sites arising from increased wastewater production'*. This implies a REDUCTION in eutrophication for designated sites in an unfavourable condition. The LPA's approach therefore

cannot be proven to support the Habitats Directive, because ***the NE solutions are entirely untested, rely entirely on hypothetical modelling and fail to consider wider seaweed overgrowth issues specific to the fishing industry exacerbated by excessive nutrient loadings into Solent waters.***

The SEMS is already in an unfavourable condition with respect to localized seasonal seaweed aggregations and Southampton Water also receives frequent unfavourable shellfish classifications due to direct sewage overspills after heavy rain. Both significantly affect the local fishing fleet. (see enclosed paper, Warsash Fishermen SEMS)

It is inconceivable that additional development could be contemplated in the Western Wards without negatively impacting the SEMS, SAC and RAMSAR sites. 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 **effectively** mitigated (rather than just compensated for). There is no evidence the N-Mitigation Plan will be effective throughout all areas of the SEMS affected by red-seaweed overgrowths.

We are of the opinion that the Plan fails badly in that respect.

If implemented as stands, the Plan is unlikely to:

- 1) ensure that red floating seaweed overgrowth within the wider SEMS (which already seriously restricts Commercial Fishing Activity within the SEMS) is not further exacerbated by increasing nutrient loadings in Solent waters, especially with respect to the Solent sewage outfall pipe serving Peel common effluent and its immediate marine environs.
- 2) ensure that water quality with respect to undesirable bacterial and viral contamination of shellfish beds in Southampton Water and the wider SEMS is not further exacerbated. (by post-rain/ storm waste-water overspills)
- 3) ensure that intertidal algal matts (seaweed overgrowth /deposition on mudflats) do not increase.

Although the Statutory Consultees for this Consultation (NE and EA) have included Assessments relating to point 3) above (intertidal Eutrophication ) in line with their Statutory duties under the Habitats Directive, (SAC's/SPA's) **they have not made any Assessments regarding points 1 and 2. This is a serious oversight and failure of the process.**

*If it is not the remit of either NE or EA to evaluate these effects (1 and 2), then we suggest further consultation with any relevant monitoring bodies. NE or CEFAS may be able to provide advice as could the fishery regulator, Southern IFCA.*

We have already prepared a paper (enclosed) which comprehensively outlines the negative effect of seaweed overgrowth on the efficiency of commercial fishing businesses operating in the SEMS. As you will see from the report, the Solent is almost unique in this respect, distinct from other inshore commercial fisheries, which makes it imperative that the wider commercial and ecological impacts of increasing nutrient loadings in Solent waters are determined by the relevant Statutory or science-monitoring bodies.

***This should be done before the Secretary of State is presented with this Plan for consideration.***

Our enclosed paper also raises the issue of wastewater overflows after heavy rain which subsequently lead to shellfish beds becoming contaminated by E-coli and viral agents., not covered by this Plan.

***There is no indication in the Fareham Plan that these contamination events will not increase and there is no indication from the EA or Southern Water advice with respect to that point.***

*In Part 2 of our paper (Warsash Fishermen SEMS, enclosed), we cast serious doubt on the ability of Natural England's Nitrogen Mitigation strategy to deliver a positive impact on seasonal seaweed overgrowths in the SEMS (specifically the red floating weed described in our paper).*

The specific failure regarding this involves the assumptions made by the mitigation scheme rationale.

For the record we will expand on that here:

*"NE's N-Mitigation strategy assumes that the effluent exiting the Peel Common outfall pipe in the Eastern Solent, homogeneously disperses with all Solent Waters. This clearly is highly unlikely. The sewage effluent plume data available from Southern Water reveals that there is already likely to be an unequal dispersion of the effluent due to distinct variations in tidal flow rates/timings throughout the SEMS (which fishermen are highly aware of already).*

*Furthermore, it is entirely unknown whether offsetting land on the Isle of Wight will positively impact marine sites within the SEMS (already seasonally infested with the red seaweed masses) which are spatially and tidally distinct from the offset watershed. In other words land offset north of Wootton is highly unlikely to reduce sub surface seaweed overgrowths along the Lee-on Solent shore, due to incomplete tidal mixing.*

*Because of these tidal variations, the area between East Bramble and Meon Shore will still likely receive a critical dose of nitrogen/phosphate and oestrogenic compounds on the westward/north-westward flowing ebb-tide. These compounds must already be having a site-specific impact on already present seaweed overgrowth here and due to shifting, already must be creating negative impacts on the wider SEMS in other bays of the Solent (that fishermen are already aware of). Potentially the Blue Marine oyster regeneration project, will also be negatively impacted, where dense algal deposits can prevent oyster spat-fall in the summer. (see historic reference to this, Warsash Fishermen's SEMS paper)*

*The local fishermen here have long supposed that the sewage outlet off Browndown must effectively 'feed' the growth of the red-filamentous floating weed throughout the spring and into summer growth season. Because of the behavior of the tidal flows in the Bramble East area, this weed congregates en masse along the contours of the seabed, including the greater Brambles Bank, eventually becoming spread along a wide area. It often persists into the Autumn and makes commercial net fishing with set nets and trawls very difficult. One area usually seriously affected is between the Lee post and Meon bouy (off Chilling Cliffs, but there are numerous weed infested spots throughout the Solent at peak seasonal growth times). It is not clear how much of this is attributable directly to the Peel outfall distinct from other outfalls in the catchment and this would require further Assessment as our paper suggests, but it IS more likely to be directly accelerated by significant localised sources of N-loading directly discharged from the Sewer discharge pipe.*

*Unless there is a significant lowering of nutrient transfer from agricultural land between Warsash and Lee-on Solent into this stretch of the fishery, as part of the Mitigation, then the nutrient loading from the Peel offshore outfall pipe would likely still encourage these overgrowths to occur along that stretch of the seabed and, without effective at-source Nitrogen/Phosphate removal at the Peel Common Waste-Water Treatment Works, would likely increase in proportion with increasing housing development and population density. '*

The Evidence base for the Fareham Plan includes the subsection 4.3.24, '*sandbanks which are slightly covered by seawater at all times.*'. We are advised that this would include the Brambles Bank and subtidal areas of sand/gravel shoals along the stretch between Lee and Chilling, together with other such banks throughout the SEMS which form important fishery locations and features for local fishermen who use a variety of fishing practices from set-netting and trapping, to trawling and shellfish dredging.

Therefore, the Plan fails on the test of soundness in that it fails to supply evidence that these banks have been fully considered in the scoping advice with respect to: seaweed overgrowths and deposition effects on the seabed habitat and associated negative impact on commercial fishing operations. We would include the likely effects on the Solent oyster regeneration project in this.

Therefore, **the Plan also fails under paragraph 6.3 (Employment)** in that it fails to consider likely significant impact to local fishing businesses with regard to *seaweed overgrowth* impacts and potential bacterial/viral *shellfish contamination* from untreated sewage overflows. There will be a likely significant impact with respect to both parameters.

Natural England's latest advice to the Council is that: '*.. this approach may be refined if greater understanding of the eutrophication issue is gained by thorough new research or updated modelling.*' (section 4.3 and 4.11, ADVICE ON ACHIEVING NUTRIENT NEUTRALITY FOR NEW DEVELOPMENT IN THE SOLENT REGION, version 5, 2020)

We advise Fareham Borough Council to instruct, with immediate effect, its Statutory and non-Statutory Consultees that research should be extended to include:

- -the seasonal floating seaweed overgrowths in the SEMS and related consultation with the local fishing fleet and Blue Marine Native Oyster Regeneration Project.
- -a study of the possible interference effects of seasonal red seaweed depositions on native oyster spatfall in inshore zones of low tidal flows. (seaweed is not dispersed effectively inshore)
- -An enhanced and detailed study of the tidal variations in the Peel sewage outfall environs specific to sewage effluent dispersal.
- -seasonal floating red seaweed deposition in the local inshore zone (SEMS) and biodegradability study.
- -A thorough assessment of the efficacy of land offsetting/N-mitigation in specific areas of the Solent catchment (eg; the Wooton Creek farm) and an evaluation on the extent of mitigation effects (seaweed growth) in areas that are not within the immediate vicinity of the designated N-mitigation/offsetting site. (this relates to seawater tidal mixing disparities, and that our contention that offsetting in one area may not impact seaweed overgrowth/ depositions in another part of the SEMS due to tidal flow differences)

We would also request that the issues we have highlighted here be retrospectively applied to the Welborne development.

Finally, in addition to the failure of the Plan regarding the subject of seaweed overgrowth and water quality and effects on local fishermen, the Plan fails the test of soundness on:

#### **Section 4 Housing Need and Supply:**

The total new homes proposed for specific sites across the Borough (not including Welborne) is 1327. The allocation for Warsash is 924 dwellings (HA1 Greenaway north and south and including the Warsash Maritime site, HA7). This contributes around 69.6% (or thereabouts) of the entire allocation proposed by the Plan, excluding Welborne. This allocation is a massively unrealistic distribution and will lead to a number of negative impacts locally and therefore unsound.

Prepared on behalf of the Warsash and Southampton Estuary Fishermen

Co-ordinated by and signed:

Stephen P Matthews,

skipper 'Sandie Ann, SU370'

Copies to: Natural England, Environment Agency, Blue Marine Foundation, Chief Fishery Officer Southern IFCA

Councillor Keith Evans (Warsash ward)

Suella Braverman MP and Fishing News.







## **Communication from Warsash Inshore Fishermen's Group.**

**November 2020**

**Subject: The effect of seaweed overgrowth and poor water quality (sewage effluent) on local inshore commercial fishermen in the Solent European Maritime Site (Part 1) and critique of Natural England's provision for nitrate mitigation (Part2).**

### **Overview**

The increased presence of nitrates and phosphates entering the Solent European Maritime Site (SEMS) via the watercourses in the riverine catchment area in Hampshire has recently shown to have had a significant adverse effect on the SEMS mudflat habitats locally, due to extensive deposits of putrefying seaweed arising from accelerated overgrowth. This led to a temporary closedown of house-building activity in the Fareham Borough while a 'mitigating solution' was found.

**Part 1** of this report will focus on this issue from the perspective of the local fishermen operating from Warsash, Hants and will widen the perspective beyond just what has been reported in the media.

In **Part 2** it will be seen that serious doubt will be cast as to the suggested effectiveness of the nitrate mitigation plan as advised by Natural England and widely being adopted by Councils since hard evidence that the plans will be successful is lacking.

It should be noted that our views regarding the extensive seasonal presence of seaweed (Part 1) generally align with other fishermen within the wider Southampton Water and Solent region together with some of the reported experiences of local sea anglers.

Since we are now highlighting the important extensive seaweed problem and committing our views to paper for the first time in local history, the reader will be able to see the significance of the seaweed issue in relation to the urgent requirement to maintain our various local net fishing practices (severely affected by weed) which are currently under threat by local fishery regulators.

## **PART 1:**

### **Solent Seaweed: An Historic Local Problem**

(\*Note the use of the term 'weed' or 'seaweed' refers mainly to invasive, free floating varieties, not species like bladderwrack or kelp which usually are not an extensive problem for fishermen here).

For many years the local fishermen that fish the Solent and estuarine areas nearby have had ongoing issues with seaweed\* overgrowth, with different types of weed causing different effects at differing times and interfering with the deployment and function of fishing gear in the district. There is also some anecdotal evidence that the decay of various types weed and deposition onto the seabed may be having some serious implications for seabed sea life and for the current ongoing Solent Oyster Regeneration Project (see below).

There has not been much, if any, serious scientific exploration of the wider seaweed overgrowth problem in the SEMS and no one has sought out the fishermen's views on this matter, until now. We are outlining here how seaweed affects fishing operations, not offering specific statements as to possible causes of seaweed overgrowth (That is covered in **Part 2**).

Local fishermen here know that recent focus by ecologists on the green seaweed overgrowth on the mudflats within the SEMS is only part of the story and obscures the wider unseen problem of floating red-seaweed overgrowth in the less visible areas, away from the general view of the public.

Fishermen here however are widely acquainted with the issue as they are effectively sampling the sea every time they go out fishing. Our intimate knowledge of the Solent seabed and the characteristics of the tidal streams is unparalleled. The next best authority (in our humble opinion) would be professional divers and maritime hydrologists.

### **Seaweed overgrowth and interaction with fishing practices**

Local fishermen at Warsash have used a variety of fishing practices throughout the last fifty-year period. During the height of the Solent oyster fishery, (1970s to 2007), the main seasonal winter fishery was oyster dredging with some clam dredging as well. During spring and summer seasons there have historically been inshore trawling for demersal fish and cuttlefish and later, the extensive use of traps for cuttlefish, together with whelk potting. Set nets, drift nets and baited longlines is also a common practice continuing until today.

All of these methods can be significantly hampered (and some methods often made literally unviable) when floating seaweed begins to grow in late April and into the summer months. This is the main fishing season for Warsash fishermen. Some fishing methods will be affected more than others.

It is said locally that Solent fishermen have to be much more determined than common as they have to contend with the extra burden and challenges of the ever-present seaweed problem, not to mention the challenge of working in a fast tidal area with extensive ship and sailing craft to contend with as well. The fisherman's decision of 'where to fish today?' is often accompanied by a question to another fishermen friend to the effect of: 'what was the weed like in that area?'..

The 'red weed', as we call it, is known by different names and grows rapidly locally (as does the green varieties of lettuce-like and filamentous green weed, often found in the mudflat areas near freshwater/brackish environments and identified by NE as contributing to eutrophication of the SEMS mudflat habitats).

There is a rapid growth of both red and green weed from the end of April into summer. Large tides (Springs) tend to disperse the red weed throughout the water column and it can sometimes be seen near the surface. It is a free floating, filamentous weed and when it stops growing in late summer is deposited in the bays and bank contours throughout the Solent with some areas being affected more than others. It can persist well into the Autumn and can still be present in some areas (Osborne Bay, Stanswood Bay, Inner Hurst, Beaulieu etc ) into the winter months, when it will have already been decomposing for a month or two.

It is regularly identified by sea anglers as being the main obstacle to rod fishing, both by shore and by boat. But that is just the tip of the iceberg.

The green weed mentioned in connection with the mudflat habitats with the SEMS also can hamper inshore fishing and angling activities on occasions. These areas are not regularly fished heavily commercially. One fishery in this environment is the historic mullet net fishery. Some of the Warsash Fishermen have inshore mullet fishing permits supplied by the River Hamble Harbour Authority. This allows them to fish seasonally and legally for mullet within the River Hamble in small boats. The fishery is similar to that of Poole Harbour which has been going for decades.



Any significant deposit of either green or red seaweed in these inshore areas will often be the deciding factor for the fisherman as to whether the net is safely deployable or not. We have noticed an increased abundance of the green weeds in the mudflat areas in recent years and the red variety is always present in the wider Solent area and can be more or less abundant depending on environmental factors like temperature, rainfall, tide strength, sunlight etc. Storm events can often move coagulated deposits inshore and dump it onto seabed contours.

The public slipway at Warsash hardway has to be regularly cleaned by the Council when often large masses of mainly green weed are taken away.

Furthermore, we must state that there may be a connection with the increasing tendency for returning mullet shoals to avoid inshore mudflats during the height of the green seaweed overgrowth. This observation has been recently noted by the fishermen locally and we wonder if it connected to the decaying effect and subsequent chemical release onto the mudflats, together with the effect of mudflat 'eutrophication' and water oxygen depletion. That will need further investigation by scientific study.

### **Netting in the Solent (SEMS) and seaweed overgrowth issues.**

#### **Set Nets/Drift/Ring**

Throughout the UK the extensive use of **set-nets** (nets secured on the seabed) is a common practice and fishermen are able to have a relatively reliable fishing method for much of the fishing season when the fish target species are abundantly available. This is not the case in the Solent and Southampton Water.

Go to any fishing port west of Swanage or east of Selsey Bill and you will be able to observe the nearly year-round use of set nets, tides permitting, (for sole for example) with little, if any, troubling effect from floating red weed. This is not to say it does not occur sometimes and there are increasing reports we hear from outside the Solent of weed events, so it appears that the issue is increasing across the south, apparently in direct correlation with population density and growth.

In our case, the use of nets can be severely restricted and made impossible by the abundance of mobile seaweed. Nets cannot be left for as long as other fishermen do in other areas. Some years, it is virtually impossible to use

extensive lengths of set nets with any reasonable expectation of making an easy living, especially in the shallower zones, where red weed settles. At other times it may be possible to leave a surface net for a short time and still catch a few fish to make it just about worthwhile. Those nets are nearly always attended by the fishermen.

Fishermen here have to modify their deployment of set nets by either stopping much earlier than many of their UK counterparts (when the weed situation becomes intolerable, usually as early as the beginning of May) and switching fishing methods (traps or bottom set lines for example) or by seeking areas in the Solent and Southampton estuary where the weed may not yet have reached 'critical mass', or by limiting the amount of net and using short soak times. The potential loss of income is considerable compared to weed free areas in the UK.

Later in the year, Autumn, the weed situation can improve markedly in some spots which can allow the resumption of some netting activity, but it can still be a liability.

Seeking out other areas to fish may, in some cases, mean going out into deeper areas off the contours of the channels in order to avoid a negative weed event ('dose of weed' is the usual local term). However, it should be stated that this has a high risk attached as the tidal currents are often greater out deeper and if the fisher gets it wrong, a 'dose of weed' will likely result, with either the loss of the gear or a long period of cleaning out the nets.

Long hours cleaning nets from weed is physically wearing, mentally demotivating and economically counter-productive. Furthermore, the practice of having to deploying nets in deeper waters just to avoid floating sea weed is a risky business due to shipping movements/small craft and is usually restricted to smaller nepe tides only, as nets do not fish well in fast flows.

We have reason to believe that the Marine Management Organization (DEFRA) which regulate quotas and legislate nationally have yet to fully acknowledge and comprehend the difficulties that Solent fishermen face with regard to this seaweed issue, affecting their ability to provide fish for the table and secure a reasonable living. Regulation on the use of nets in the inshore zone throughout the UK and locally always fails to take into account the hampering effect on fishermen due to extensive mobile weed effects.

Furthermore, we should also state for the record that the Warsash Inshore Fishermen's critique of the proposed restriction on netting practices within the estuaries of the Southern Inshore Fisheries and Conservation Authority (SIFCA) and wider district should also be seen in the context of the difficulty of deploying nets locally, due to extensive hampering from the presence of seaweed. Again, this has not yet seriously been a consideration by the Authority and we hope they will take these comments here into consideration during their Consultation.

Fishermen also use a variety of drift net practices throughout the UK. The local fishermen here can fall back onto a drift net fishery to a certain extent, in line with national legislation requirements, when the setting of fixed nets is made impossible by sea-weed overgrowth. Drift nets are highly size selective. Because the net drifts with the tide the worst of the seaweed can often be avoided, but this is not always the case.

The use of drift nets (and also set nets) is severely restricted by the incoming yearly natural growth of a plankton called noctiluca, (known locally as 'the fire'\*\*) which is bio-luminescent and lights up the water when disturbed (for example by a moving vessel, boat propellor and also by tidal currents).

\*\*'Fire' appears with the return of the 'May Water' when the 12 degree (celsius) seawater thermocline reaches the local area, usually by mid May, .

Tidal currents moving across either a drift net or a set net will cause the plankton to literally light up the net, sometimes leaving a jelly-like deposit on the mesh. Some species of fish that have good eyesight, will often be able to see the net glowing in the dark (as nets are often deployed after dark) especially in clearer water conditions and this will often highly restrict the catch at times. Other fish species like sole do not seem to be affected by the 'fire'. 'Fire' makes the use of nets for some fish much less effective and therefore reduces the effective netting season by a large degree.

*The increased presence of nutrients like nitrates and phosphates in the seawater will likely exacerbate the overgrowth of this plankton and this is an additional concern for us. Further scientific study will be required.*

The 'fire' problem is commonly known by fishermen, but again, as with seaweed presence, is underappreciated by local and National commercial fishing authorities who may inadvertently seek to restrict or regulate the

seasonal deployment of nets without duly taking these already significant 'natural' restrictions on net deployment into account.

Another netting method which can be used to overcome the natural restriction of 'fire' and weed is ring netting in daylight hours in a small circle with a short length of net, (effectively a set net). This has already been officially recognised as a method of net fishing by Danish/Dutch authorities and we are seeking a similar classification here liaising through the NFFO with the use of (attended) short lengths of surface net, which also significantly lower the risk of salmonid interception in estuaries. This, if successfully negotiated with the local Authority will be a first for UK inshore fishermen.

This method is also the common method used in the Poole harbour mullet fishery. Because the net is deployed for a short time only, a 'dose of weed' can often be avoided, but not always. Short time net deployments locally are therefore the only real option left for local fishermen at most times of the year.

### Longlines

When the red weed has reached maximum growth the use of longlines in certain areas can be rendered much less efficient. May through June is not really much of a problem in the deeper areas. By high summer the longline fishery should be in full swing with line caught fish like bass, skate and ray being a viable fishery.

The best areas to deploy to avoid weed are in the deeper sections of the Solent away from the contours where weed tends to get dumped by the tidal flows. Some areas by late July are usually un-fishable by longlines. These usually include inshore at Osborne Bay, Stanswood bay, Chilling and Hillhead and most of the stretch between Beulieu and Hurst. Some areas of Southampton Water can get bad also; near Calshot and the Thorn Channel are notorious as well for gathering red weed masses in summer, with some years better/worse than others.

Off the 40' contour however, it is usually possible to find a relatively weed free stretch on some tides. However, this year (2020) some fishermen had to cease line fishing late July as most of the best offshore areas were infested with red weed for a few weeks as well. This was the case for at least one Lymington fisherman that we know also, working further west, (personal communication).

By September 2020, most of the weed in the deep had been shifted by tides and wind with fewer areas affected offshore. Some of it had still remained inshore however in the areas which do not benefit from regular tidal flushing (bays) and tidal dead-spots such as Norris near Cowes.

Apart from the obvious interference of weed on the hooks of a longline (reducing fish catches) red weed packs onto the buoy- to- anchor line with the moving tide, taking down the marker buoy and in some cases, it will only reappear later in the slower part of the tide cycle. This means that the fisher has much less time to retrieve gear before the tide turns and begins flowing back in the opposite direction. It can become then a race against the clock. Therefore, the fisher will have a tendency to be less motivated to shoot the number of longline sets they usually would deploy.

Furthermore, retrieval of a weed packed buoy line means that a significant time loss will ensue as the fisherman will have to pull off (by hand) the weed packed onto the buoy line. This is easier said than done. Often the amount of weed is considerable, with historically nine to twelve-foot columns of weed measuring a foot wide packed solid onto the line not uncommon. Again, as with net cleaning, this represents a serious time wasting and physically draining extra operation which would not be the case if there was a lot less or no weed present.

### Trawling

There are a few trawlers which regularly fish in the Solent and the skippers tend to be very cautious about where and when they deploy the gear due to the potential for a 'dose of the weed'. As with lining, the deeper areas are often favoured, away from weed strewn areas.

In September 2020 we had a report from a Gosport fisherman who deployed a trawl inshore in the Solent and filled the entire trawl up with the free-floating red weed. Simply put, a trawl just will not fish effectively if there are significant quantities of seaweed on the Solent sea bed. It is very disheartening for trawl skippers as they have a higher fuel cost overhead to pay than some smaller non-towed gear vessels and wasted efforts due to the presence of weed are de-motivating.

### Shellfish dredging



Toward the end of the now defunct historic Solent Oyster fishery (2007) the presence of large masses of red weed sitting (and rotting) on the inshore seabed was cited by some fishermen as being a significant detrimental effect to the deposition of juvenile oyster spat. This problem was part of the perfect storm which sealed the fate of the already reducing return spat falls of the Solent Oyster largely triggered by the invasion of the American tingle driller whelk.

Other factors such as a failure to close the fishery earlier were also at play, (which led to over-fishing an already non renewing stock) but it is commonly accepted by local Warsash fishermen that seaweed overgrowth also played a significant role in the last days of the fishery.

The red seaweed overgrowth has also been raised at a recent committee meeting of the Southern IFCA relating to the oyster regeneration project. (September 2020). It is possible that the comment was 'minuted'.

Along Chilling and Hill Head, we have at least one testimony from a member of the Warsash group which describes the required effort to continually hold the same line of dredging for a considerable time in order to 'get through the weed' before any oysters could be reached.

The success of the Solent Oyster Regeneration project instigated by the Blue Marine Foundation will rest mainly upon the successful spatfall of small juvenile oysters onto the seabed. Many variables will be at play, including the presence of oyster pests like starfish, but the presence of large areas of trapped seaweed in the summer to autumn in some local bays not subject to much tidal flushing will severely reduce the success of this project in our opinion; since the numbers of adult oysters being set in cages in the marina environment represent nowhere near the kind of density of oysters that we remember on the seabed during the height of the fishery in the late 1970's and through to the 1990's. Back then, the seabed was literally thick with healthy, thriving oysters. Even the 'smell' of the sea was different, as we remember it.

The fishermen living now, that were involved in that industry, are the last living link to an important part of social history and all that knowledge will disappear with them.

The disappearance of the Solent oyster also has a cumulative knock-on effect, since there is no longer the massive water filtering capacity that was once present (one adult oyster filters up to 200 litres a day). Increasing seasonal,

mobile red weed on the seabed which eventually settles, decays and reduces seawater oxygen content is more likely then, to have a localised negative environmental impact, making the seabed even less hospitable to newly hatched oysters. It is doubtful this has been extensively studied, so more work would be required.

Although we wish the Blue Marine oyster project every success, the local fishermen are not very optimistic and even less so, when we know there is a largely unseen and un-acknowledged seaweed overgrowth problem which has not been factored in as well as the fact that oyster pests have not yet been removed.

### Scallops

This year (2020) the newly emerging Solent scallop fishery\* was affected by the mass of seaweed in Osbourne bay (mid summer) which stopped effective dredging for scallops there (Warsash Group fisherman's testimony). Sighting data from the Southern IFCA would be able to confirm that point. Only when the weed had cleared on the bed enough did the fishermen return there (mid September into October). At the time of writing (November 2020) the scallop areas in the bay have cleared and are largely weed free.

The efficient functioning of any shellfish dredge will be highly reduced if red-weed and other weed species are in abundance. The only option for the scallopers is to find spots out much deeper, but with the added increase risk associated with dredging in deeper waters (quick capsize after snagging on seabed being an ever-present and potentially lethal threat)

\*With the disappearance of many oysters, a relative newcomer has begun to take hold; the scallop. Which is good news for the local fishermen.

### Shellfish Beds in the SEMS and Southampton Water

There are many different shellfish types in the area. Oysters, clams, cockles, whelks, winkles and scallops. All of these can be fished under fishing license and are very sensitive to water quality, especially the bi-valve varieties like clams and oysters.

The main issue is the detrimental effect of bacterial and viral contamination resulting from inefficient sewage treatment and/or sewage overflows, the latter being a more likely after high rainfall events, like torrential downpours.

The classification of shellfish is carried out regularly and reported in a UK wide Sanitary Survey.

The Southampton Water is regularly tested for E-coli by the Food standards Agency in Southampton and a shellfish will only be designated if the species in question is tested. Once that occurs a designation will result; class A, B or C.

For many years now, manilla clams and pelourdes clams in the upper Southampton Water have regularly received a class C designation or the areas have been closed completely due to high E-coli levels, making the shellfish unfit for human consumption. Therefore, fishing activity is severely affected.

This situation has gone on for many years to the detriment of the local fishing industry. No schemes are in place to compensate fishermen for the yearly loss of potential earnings. Furthermore, the longer the beds remain unfishable, the less the shellfish will benefit from regular turning which can lead to the terminal decline in quality of the beds.

The recent upgrade to the sewage treatment works at Woolston will theoretically lower the E-coli/viral loadings from the effluent which is a positive development. However, with increasing pressure on the sewage system infrastructure due to an expanding population density in Southampton, it is questionable as to whether there will be any change in the shellfish quality as sewage overflows after heavy rain will still likely occur, (our assumption). (The population of Southampton grew by around 18 percent between 2001 and 2011; it is even higher now)

This is further re-enforced by the fact that climate change models predict far more frequent torrential downpours, leading to the increased risk of sewage overflow events (CSO's), allowing raw sewage to make its way into the shellfish production areas.

This is already an increasing problem in the Poole Harbour district, with at least one shellfish cultivation business currently being negatively affected.

As to the wider Solent: The current shellfish classification is taken to be Class B (which means the shellfish must be tanked for a short period with UV filtering in place). Any lowering of the water quality due to increasing sewage overflows and/or increasing sewage effluent discharges (from expanded development) will be a severe negative for the local fishing industry.

## **Part 2:**

### **Analysis of the Nitrate Mitigation proposal (Natural England)**

**Author: Steve Matthews, Fishing Vessel, Sandie Ann, Warsash.**

Disclaimer: The following analysis is solely that of the author alone and may not necessarily reflect the views of all inshore fishermen throughout the district. The causes of the wider Solent seaweed overgrowth problem outlined in the description above (Part 1), should be investigated by independent scientific assessment.

Pending further scientific study, it is reasonable to assume that the problem of the largely hidden red filamentous seaweed overgrowth issue we have uniquely outlined in Part 1 above is causally linked to the green seaweed inshore deposits, already identified as a significant problem on the SEMS mudflat areas by Natural England and wildlife organizations (Eutrophication).

It is also reasonable to assume that the existence of excess nitrogen compounds/phosphates and their sources (sewage and farm run-off being just two) is also causing the *offshore* red seaweed issue which can seriously interfere with commercial licensed fishing activities and has done so, unacknowledged by Government environmental bodies, for many years.

***Our group estimates that for local set netting alone the seasonal fishery potential net worth is reduced by as much as 80% from May to September due to the presence of free-floating red weed restricting the effective use of fishing nets. This is therefore a serious concern.***

***Other trawler skippers that operated locally would also be able to give similar estimates.***

The solution presented by Natural England (NE) of offsetting farmland in the water catchment area (taking out of agricultural production/re-wilding) has been suggested as a solution to the SEMS nitrate problem and looks, on the face of it, to be a reasonable one.

However, it is only a recent methodology, still highly hypothetical (rolled out in Poole, only a few years back) and there is no hard guarantee that the problem will be solved throughout each separate estuarine area and in the wider Solent (SEMS).

Indeed, the introduction of the Poole and Purbeck nitrogen mitigation scheme in 2017 may have had some local effect on the green weed overgrowth ( has

that been scientifically demonstrated yet?), but clearly the shellfish cultivators there still have a problem with E-coli.

Therefore, it would appear that Combined Sewage Overspills (CSO's) are still occurring there (mitigation scheme or not and assuming sewage transfer from leisure craft have remained static) and that therefore, nitrogen is still being delivered directly into the aquatic environment from raw sewage sources, leading to ongoing seaweed overgrowth as well as associated E-coli/Norovirus shellfish contamination.

Since that is the case in Poole, serious doubts as to the effectiveness of the Nitrogen mitigation Scheme (Natural England) applied to the Solent water catchment are not unreasonable to raise.

Furthermore, the NE model appears not to factor in the climate change models into the N-mitigation methodology. Higher seawater temperatures will likely further accelerate seaweed growth, quite possibly negating any nitrogen-offsetting effect. The appearance of nocticula ('fire') as described in Part 1 is highly temperature dependant, just one or two degrees, as is the appearance of migrating fish.

Increasing torrential downpours will likely increase run off events and CSO's. Increasing housing development in the Solent catchment will lead to increasing hard-surfacing of the countryside and road building. *Those two causes, downpours and hard-surfacing, working together, will likely lead to an increasing irreversible compounded effect:* ie; a higher delivery rate of water run-off (and therefore nitrate/nitrogen compounds from various sources) to the SEMS. This does not appear to have been taken into account by the NE model.

Also, the nitrogen leaching effects from groundwater exacerbated by increasing run offs into the proposed development pond systems (SUDS) appear not to have been factored in either. Since those ponding systems are supposed to 'return water as quickly as possible', there is an un-quantified factor here also.

Additionally, the 110litre per day water compliance for developments is un-enforceable and therefore the wastewater flow determinations will likely to be higher in many cases.

The Natural England models and calculations assume complete tidal mixing of the run-offs and effluents with Solent tidal waters into the SEMS. As stated above, local fishermen's knowledge of the Solent seabed and tidal streams in the Solent is unparalleled and lead the author to conclude that if offsetting is carried out on the Isle of Wight (for example) to allow exclusive continued development of green-field sites on the mainland then the effluent nitrate offset from re-wilding a farm north of Wootton (for example) is highly unlikely to make any difference to seaweed overgrowth at Chilling (for example) due to the way the tidal flows move in Osbourne Bay.

That is a serious oversight by NE.

Note: The Southern Water sewer plume map (made available at time of writing) only shows the eastward flow of the plume from the outfall off Lee on Solent/Browndown. This is only the flood tide representation and not the ebb tide (westward flow). All of the hydrological modelling and mapping of the plume flows would need to be made available by Southern Water in order to be able to draw any further conclusions.

As well as the delivery of nitrogen via the watercourses, the NE calculations for nitrate loading and subsequent guidance for housing developers appear not to take into account sewage overflows (CSO's) after extended heavy rain/torrential downpours and subsequent likely nitrogen, bacterial and viral delivery and contamination of shellfish beds.

Unless developers are building adequate sewage flow infrastructure into the development then Combined Sewage Overflows (CSO's) will still likely increase in proportion to increased development. Food Standards Agency (FSA) limits for shellfish *may still continue to get worse* as they regularly do most years in Southampton Water after FSA monitoring.

*In other words, the viability of our inshore shellfish beds will still likely be at risk and will likely have an even higher risk in proportion to ever increasing development in the SEMS catchment.*

*Even with nitrate land 'offsetting' more local to the proposed development this fact will likely not change due to CSO's.*

The models used by the NE and the EA have not factored in the future (with increased development) considerable nitrogen loading into Solent catchment resulting from nitrogen loading from increasing car exhaust emissions and industrial development. All the science shows that with increasing development and road use and vehicle numbers, the nitrogen loading will increase significantly.



As with increased chance of CSO's after heavy rain due to more hard-surfacing, their will a similar increase delivery flow rate of dissolved nitrogen compounds to the SEMS; again, a factor not taken into account in the NE model.

The Fareham Borough and Eastleigh Council for example, must already know that the local road systems have been pushed to over-capacity in a very short time within the last few years, evidenced by virtual gridlock on the A27 road (just an example) at peak flow times: their highway modelling has already clearly failed local people who are living daily traffic nightmares in Locks heath, Sarisbury Green, Hamble, Fareham and Southampton. It is not clear whether any scientific assessment has been carried out as to the increased delivery of nitrogen compounds via vehicle exhaust emissions from increasingly free standing/engine idling traffic in gridlock and increased traffic flows in general. All of this extra nitrogen is likely ending up in the Solent and NE has failed to include it in their calculations. Another massive oversight.

And it is not just local. This would also include the entire road infrastructure, including motorway areas in South Hampshire, where exhaust emission nitrogen contaminated road water run-off feeds into SEMS. Increasingly wider gridlock events and increasing traffic in South Hampshire must be supplying significant emission-dissolved nitrogen compounds to the water catchment adjacent to many roads. (This has been widely studied in the USA).

Notwithstanding micro-particulates from tyre rubber and oils, washing into the same catchment systems; the biological effect on water borne fauna (like salmonids and other fish) from these particulates has simply not been scientifically determined.

All of this leads to the reasonable assertion that the calculations for nitrate loadings in the NE models are highly likely to be inaccurate by a significant degree, the expected offsetting effect: doubtful. There will still be a doubt regarding the current 'nitrate'/seaweed problem which is already being exacerbated by overdevelopment in the Hampshire water catchment zone feeding into the Solent (SEMS).

Further development in proportion with an ever-expanding population growth will likely further exacerbate these problems. It is simply the law of cause and effect in action.

The conclusion is that it is highly uncertain that the SEMS water quality with respect to nitrates/phosphates will *practically* change and that it is *highly*

*uncertain* that all the affected estuarine habitat (SAC's and SPA's) areas relating to seaweed overgrowth on mudflats and the wider SEMS where we fish will improve consistently throughout the district.

Secondly, it is highly unlikely that the water quality with respect to E.coli/norovirus contamination in shellfish will improve since CSO's will still be happening in proportion with increasing development without considerable improvements in the infrastructure/treatment of sewage.

Thirdly: any increasing CSO's will still deliver a loading of nitrogen (other than 'nitrate') in other nitrogen compound forms from raw sewage overflows, along with bacterial and viral contamination into the SEMS and Southampton Water, so there is some reasonable doubt that NE's nitrate offsetting methodology will actually be practically effective in reducing wider free-floating red seaweed overgrowth and improving the microbial quality of shellfish beds in Southampton Water and SEMS.

Regarding shellfish quality: most wider SEMS Food Standards Agency classifications are currently assumed as class B. However, that could easily be reduced to Class C with more frequent testing and an increasing CSO threat resulting from increased development. That must be avoided, the fishermen will not be happy if that happens.

Class C shellfish rating would be a disaster for the local clam shell fishing industry, the emerging Solent scallop fishery and the Solent Oyster Regeneration Project (Blue Marine Foundation). The potential loss of the Solent shell fishing industry would be incalculable. This is already a clear possibility and looming threat for Poole Harbour. Although Poole Harbour does not benefit from tidal flushing in the same way as the Solent, there is still a reasonable degree of doubt for the SEMS, so it would behove NE to take our warnings seriously. This year for example we have already seen an extension south, down the Southampton Water towards Chilling, of an unfavourable Class C rating for one clam species. (see FSA survey 2020).

Currently, in Poole Harbour, shellfish cultivation businesses are significantly being affected due to bacterial sewage contamination. (personal communication/Southern IFCA Committee meeting comment Sept 2020)

Any increase risk of contamination from sewage overflows applied to the local shellfish fishery most likely to prove detrimental to the quality of our local

shellfish beds and fishery will most certainly result in litigation with the water companies. We are watching the situation closely.

It appears that the local Councils together with NE and the Environment Agency have rushed through this nitrate mitigation 'solution' in order to enable the ever-expanding over-development of green field sites by developers within the SEMS water catchment area to continue. This will mean that over-development will continue and that the un-studied negative environmental effects like red seaweed overgrowth will also likely continue.

It is alarming that such on- the- hoof science (without hard, long-term proof that the measures will be successful) can be fast tracked through by Government Agencies who are failing to protect not only our green field areas but the very unique landscape of parts of southern England.

It should be their responsibility to assert that Central Government implement sensible policies which control the drivers of unsustainable housing demand (namely the drivers of population growth and movement of people). In short, sustainable policies for sustainable population growth, which include a revocation of existing legislation that currently enable unbridled green-field development by housing developers.

This would also help ease pressure on offshore marine aggregate dredging (which supports the building industry) which often takes place in environmentally sensitive juvenile fish spawning grounds in the English Channel and elsewhere. These grounds are being dredged back to bedrock in some cases, partly to feed ever-expanding UK housing/population growth.

Therefore, pending those long overdue changes to Central Government policy, and taking into consideration our analysis above, it would be pertinent that all current development in the Solent (SEMS) water catchment cease with immediate effect, until further long-term studies and peer review has been carried out.

Steve Matthews

Warsash Inshore Fishermen's Group



November 2020



**Respondent details:**

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

**1) Policy: TIN1 - Sustainable Transport**

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

**Please provide details you have to support your answers above**

Reference Transport and other infrastructure Sustainable Transport Para 10.1 A convenient, efficient, resilient and safe transport network within the Borough is vital in supporting residents, businesses and visitors to the Borough, and to the wider economy of the Solent area. Para 10.3 Ensuring convenient cycling and walking networks which contribute towards a modal shift away from less sustainable modes of travel, providing genuine alternative options to the motor car; Policy TIN 1, para 10.5 “Applications should be supported by a Travel Plan.....” I believe the above ambitions will not be met by the LCWIP (yet to be published) therefore I consider that this element of the Fareham Local Plan is not sound. • The available information on the LCWIP contained in the Local Plan Strategic Transport Assessment document, Fig 3-5 Draft LCWIP proposed cycle network, appears to show a network of on road cycle routes. Cycling Weekly (and my own experience) cites sharing the road with lorries, the threat of being passed too close by vehicles and poor road surfaces were the top three factors putting people off cycling. <https://www.cyclingweekly.com/news/lorries-close-passes-biggest-deterrents-putting-people-off-becoming-cyclists-poll-concludes-381743> • The only new walking and cycling infrastructure is The Delme to Downend Bus and Cycle TCF scheme comprising the Northern footway widened to create a SUP between St Catherine’s Way and Downend Road signalised junction; a distance of 213m to be precise • Travel plans for local developments have been poor and misleading with regard to the local walking and cycling infrastructure. • An example of this is shown in this document [https://1drv.ms/b/s!AnQ00\\_4OgfUqvETtPfc9i2KADWu6?e=ldNGgp](https://1drv.ms/b/s!AnQ00_4OgfUqvETtPfc9i2KADWu6?e=ldNGgp) with further supporting evidence here, item 88, Phil Jones Associates (ATR0099) <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/148713.htm> para 3. I have no wish to comment on whether or not this element of the plan is Legally compliant or complies with the duty to co-operate. However, a box needed to be ticked to progress.

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

Unable to comment as the LWCIP has not been published

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

NA

**Your suggested revised wording of any policy or text:**

NA

**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

---



Non survey response

Received – 14.12.2020

Is an agent appointed: No

Name: Mr Graham Webb



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

Housing policy

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

No more building of houses anywhere in the Gosport/ Fareham area

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

If I understand the question- it would make the air cleaner- less traffic fumes, less of an impact on the NHS

**Your suggested revised wording of any policy or text:**

Sorry no idea what to write here

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

Yes

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

As a local person near the A32- and the centre of Fareham- I listen, and at work talk about the traffic and the land we all hope will not be built on

### Respondent details:

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

### 1) Paragraph: 2.12

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

### Please provide details you have to support your answers above

Strategic priorities 1 and 11 fail to address FBC's commitment to carbon neutrality by 2030. FBC made a commitment to the borough to achieving carbon neutrality by 2030 in an Oct 2019 council meeting. A carbon reduction plan has yet to be published but it seems FBC is limiting this ambition to activities over which it has direct control. This is very disappointing. Surely, in a local plan of this scope and reach, where FBC has the power of approval, FBC should be prepared to take a lead in energy conservation and carbon neutrality by mandating building design policies which to help achieve these objectives, not only in 'the embodied energy' of construction materials (para 11.24) but also in whole-life energy consumption and reduced CO2 emissions through insulation, choice of heating systems and re-usable energy sources.

• By echoing a national preference for 'mass transit and other means of transport', without suggesting how these alternative transport systems might become available/practical, the housing policies HA1 and HA7 (approx. 950 homes) aggravate the already serious congestion faced by car (and bus) passengers attempting to reach the A27 or the M27 from the Warsash peninsula in peak periods. These policies attracted hundreds of reasoned objections, mostly about transport and local facilities in the 2017 consultation. In the current plan, however, these allocations seem unchanged. They are in evident conflict with plan statements with regard to Transport and Other Infrastructure (10.3) on 'accessibility improvement' and 'management of network congestion'. The bullet list of road improvements at para 10.15 does include improvements to Warsash/Abshot Road but neither of these appear to be of relevance to the problems of A27 or M27 access. • The plan (para 11.10) states that 'Development should avoid being in a place that is dominated by vehicle access and movement priority'. So don't build on a roundabout. However, out-of-scale development (HA1 & 6 again) will generate vehicle access and movement priority by further extending the existing commuter and school access traffic jams.

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

Where FBC has the power of approval, FBC should be prepared to take a lead in energy conservation and carbon neutrality by mandating building design policies which to help achieve its declared carbon neutrality objective, not only in 'the embodied energy' of construction materials (para 11.24) but also in whole-life energy consumption and reduced CO2 emissions through insulation, choice of heating systems and re-usable energy sources.

Substantially reduce the HA1 and HA7 housing allocation (preferred option) or commit to road improvements to cope with existing problems and to cope with projected increases in use.

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

FBC would then be honouring its commitment.

Self evident

## Your suggested revised wording of any policy or text:

Above words should be summarised to extend the wording of Strategic Priorities 1 and 11 at para 2.12 to include the FBC carbon neutral commitment. Full wording to be included later in the report in the Climate Change and Design sections (8 & 11)

This could depend on how FBC elects to address this problem. It's worth noting, however, that the Total Housing Requirement at para 4.6 Table 4.1 is stated as 8,389. Puzzlingly, this includes a 15% contingency instead of the national requirement of 10%. So the plan includes a surplus of 364 homes over the requirement. One might therefore look no further than a 364 house reduction to the HA1/HA7 allocation to bring the total requirement back into line.

## 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: 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

Transport and other infrastructure. para 10.3 . The plan gives insufficient attention to 'accessibility improvement' or 'management of network congestion', particularly in respect of the Warsash peninsular and the effects of HA1 and HA6 in their contribution of traffic associated approx 950 new homes which will aggravate the already serious congestion faced by car (and bus) passengers attempting to reach the A27 or the M27 in peak periods. These policies attracted hundreds of reasoned objections, mostly about transport and local facilities in the 2017 consultation. In the current plan, however, these allocations seem unchanged. They are in evident conflict with plan statements with regard to Transport and Other Infrastructure (10.3) on 'accessibility improvement' and 'management of network congestion'. The bullet list of road improvements at para 10.15 does include improvements to Warsash/Abshot Road but neither of these appear to be of relevance to the problems of A27 or M27 access. The plan (para 11.10) states that 'Development should avoid being in a place that is dominated by vehicle access and movement priority'. However, out-of-scale development (HA1 & 7 again) will generate vehicle access and movement priority by further extending the existing commuter and school access traffic jams . The plan is therefore internally inconsistent.

This allocation takes over a significant portion of the Locks Heath Centre Car Park, as does HA37 which is represented separately. There is no evidence that the car park under-utilised. On the contrary, cars using the centre overflow inconveniently onto adjacent roads at the busiest periods. Subpara (g) of HA36 states :Reconfiguration of car parking needs to consider requirements and functions of the existing shopping centre; The existing 'Requirements and functions' therefore show this allocation to be without merit

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

The plan should either include a plan or priority statement making introducing significant improvement to roads connecting the Warsash peninsular to the A27 and M27 or, alternatively and preferably, drastically reduce the housing allocations at HA1 and HA7.

Delete HA36

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

See above

Self evident

**Your suggested revised wording of any policy or text:**

See above

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

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

---

### 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**

This allocation takes over a significant portion of the Locks Heath Centre Car Park, as does HA36 which is represented separately. There is no evidence that the car park under-utilised. On the contrary, cars using the centre overflow inconveniently onto adjacent roads at the busiest periods. This allocation is without merit.

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

Delete HA37

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

Self evident

**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

---

### 4) Policy: HA7 - Warsash Maritime Academy

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

**Please provide details you have to support your answers above**

HA7 states at sub para (a) that: The quantum of housing proposed shall be broadly consistent with the indicative site capacity, including conversion of the building currently known as the Shackleton building to flats; This relatively modern building is described in the plan as a 'Statutory Listed Building'. I have no objection to this part of the proposal per se, except for a general objection to over-building on the Warsash peninsular. However, the former Warsash Academy site includes a row of four coastguard cottages, constructed in approx 1900 which alone preserve the historic identity of the site and appear to be without protection. I suggest that this should be re-considered.

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

Consider protection of the 'Coastguard' building, by sympathetic conversion into housing.

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

Self evident

**Your suggested revised wording of any policy or text:**

Reword HA7 as suggested 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:** Clive Whitaker [REDACTED]  
**Sent:** 13 November 2020 11:14  
**To:** Consultation  
**Subject:** Fareham Local Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I support the Local Plan in general. However I believe that Romsey Avenue together with the two adjacent fields should be given special protection as part of a Coastal and Habitats policy due to their sensitive position and the fact that it is a Special Protection Area for waders and Brent Geese. This would be in accordance with National policy such as paragraph 177 of NPPF. As you will know, Fareham used to have a Coastal and Countryside policy which covered these areas and which would have enabled the Council to win the Cranleigh Road appeal.  
Sent from my iPhone



**Respondent details:**

Title:	Mrs
First Name:	Christne
Last Name:	Wilkinson
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	Yes
Complies with the duty to co-operate	Yes

**Please provide details you have to support your answers above**

Fareham Borough Council's adopted Statement of Community Involvement states "the Council aims to give everyone an equal opportunity to influence and comment on plans and planning applications shaping the future development within Fareham". It also states that it will use a variety of methods and "will understand the needs of different stakeholders and engage and consult in a way that suits them". They have not shown this in their actions. The council paid a distribution company for 53000 editions of the Fareham Today Special Edition to be printed and delivered to every household within the borough. These were very important at this time - especially to people who do not use the internet or social media. We are in the middle of a pandemic. People are unable to visit the council offices or pick up a copy of this in the library. In fact, none of the face-to-face methods outlined in the Statement of Community Involvement (How will we engage and consult? 5.1 d to g) have been used. There have been no stands in the shopping areas with the leaflets available to collect and FBC staff to explain the content. There has been no exhibition in a local building nor a CAT meeting. The notices on bus stops and notice boards would not be seen by people during lockdown or by those shielding or self-isolating. The virtual exhibition which is "available to everyone at any time of the night or day right up until 18th December" is of no use to the people will not know about this or will be unable to access it. For many, the delivery of this through their door would be their only access to the information. These leaflets were not delivered to all households. People in more than 70 roads in Portchester alone, reported on social media that they had not received a copy. Some quick investigation showed that roads in Fareham, Titchfield, Warsash and Stubbington had also not had these delivered. The PR and Marketing Manager does not know which roads have had the leaflets delivered and which have not, how many had been delivered and why so many roads had been missed. The non-delivery of these leaflets does not indicate that Fareham council understands the needs of residents, nor that it engaged in a way that suited all. While the PR and Marketing Manager informed me that Fareham Today does not form part of the consultation material, the fact remains that by delivering this to some but not many others, Fareham Council has not given everyone in the borough 'equal opportunity' to access the information needed to know where and how to comment on this stage of the consultation.

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

An extension of/ further consultation period to allow the delivery of Special Edition of Fareham Today to all households and time for those residents to comment should they wish.,

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

It would give everyone "an equal opportunity to influence and comment on plans". as stated in the adopted Statement of Community Involvement,

**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):**

I have information (including email exchanges) which shows evidence of the issue I have highlighted.

---

**Keely, Lauren**

---

**From:** Rob McLennan [REDACTED]  
**Sent:** 18 December 2020 14:06  
**To:** Planning Policy  
**Cc:** 'Sally Fish'  
**Subject:** Wilky Group consultation on behalf of Lyons, Sleeman & Hoare architects response  
**Attachments:** Cams Hall 201215 RMCbb Letter to Fareham Borough Council (002) (2) - SF amends.pdf  
**Importance:** High

Dear Planning Strategy Team, Fareham Borough Council

We have pleasure in attaching a representation to the current consultation exercise on behalf of the Wilky Group and in relation to Cams Hall in Fareham.

Please see attached pdf document.

We would also ask to be notified at the address below 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

Please do not hesitate to contact me should you require any further information or have any other queries.

Kind regards

Rob

Rob McLennan BA(Hons) MRTPI  
**Senior Planner**

For and on behalf of  
LYONS+SLEEMAN+HOARE | Architects



**Covid-19 Update December 2020: Providing you with the best continued service: Lyons+Sleeman+Hoare's offices are open to staff teams on a rotational basis only, for use in line with current government guidelines. Our telephone switchboard will not be fully staffed and so please get in touch directly with your L+S+H contact or a Director by email or mobile.**

**The Irish Building & Design Awards: [Retail Project of the Year - Kildare Village, Phase 2](#)  
BCSC Gold Awards: [Winner- Established Centre Award- Bicester Village](#)  
Evening Standard Best British Homes Awards: [Winner- Best Regeneration project- The Square- Chichester](#)  
BCSC Gold Awards: [Winner- Best Out Of Town Retail- Peterborough Garden Park](#)  
UK Commercial Property Awards: [Winner- Best Retail Development UK- Bicester Village](#)**

[www.lsharchitects.co.uk](http://www.lsharchitects.co.uk)

Nero Brewery, Cricket Green, Hartley Wintney, Hook, Hampshire , RG27 8QA



**Keep it green, read from the screen**

**DISCLAIMER** We intend this e-mail message only for the person or entity named above. This message may contain information that is confidential or exempt from disclosure under applicable law. If you are not the addressee or an employee or agent responsible for delivering this message to the addressee, please notify us immediately by telephone and remove this document from your e-mail system. Any dissemination or copying of this message by anyone other than the addressee is strictly prohibited.



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

By email

Dear Sir/Madam

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

This representation relates to Cams Hall, which comprises a statutory Listed Grade 11\* Heritage Asset, which is adjacent to the Cams Estate Business Park, in Fareham.

The details of the Listing are below:

List Entry Number: 1232890.

Date first listed: 18-Oct-1955.

Date of most recent amendment: 20-Dec-1989.

Statutory Address: CAMS HALL, PORTCHESTER ROAD

This representation re-affirms and supplements a case put on behalf of the Hall's owners, The Wilky Group, in this connection by Turley Planning Consultants on 4<sup>th</sup> December 2017.

A full Copy attached of this submitted representation is attached at Appendix A.

These representations seek the removal of the Cams Hall itself, together with its listed grounds and curtilage from the Proposed 'E5 Employment Allocation', as it is presently represented in the current consultation draft local plan.

In summary, the inclusion of this historic heritage asset as part of the E5 Allocation is considered to remove the required flexibility to enable the owners to continue to maintain the asset in its 'Optimum Viable Use'.

Policy E5, as it relates to the Hall itself, is considered overly restrictive and does not allow the flexibility to consider other uses and other public benefits that may accrue through future changes of use and / or related development that may be required to retain the viability and beneficial continuing use of the Grade 11\* listed Hall in a manner that will best secure its long-term future.

This conflicts with National Planning Policy Framework advice and guidance which in relation to the future of economic changes and challenges states at paras. 80, 81 and 120 that;

*"80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*

*"81. Planning policies should:*

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

Cont ...

*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.*

*"120. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*

*a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped);*

Policy E5 as it relates to Cams Hall itself also conflicts with Heritage Policy within the Framework which states at paras 185 and 192 that;

*"185. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

*a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;"*

*"192. In determining applications, local planning authorities should take account of:*

*a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation...;*

Accordingly, it is contended that The Local Planning Authority should rely on the decision making process to determine the 'appropriateness' of future uses / development proposals for Cams Hall in the light of 'Heritage' based policies and related advice and guidance contained within the NPPF, other development management policies of the local plan and advice and guidance available from Historic England.

It is not 'sound' therefore for the Local Plan to contain 'prescriptive' policies restricting the future of such an important heritage asset. Rather the maximum level of flexibility should be allowed for the owners to find and deliver the most beneficial uses / development at the Hall site, particularly in the current economic climate, where occupancy levels have already reduced as a direct result of the COVID-19 Pandemic.

Accordingly, the owners of Cams Hall object to the soundness of the local plan as presently proposed on the basis that this policy, as it relates to Cams Hall itself, has not been positively prepared, is not justified or effective, and is inconsistent with national planning policy.

This therefore is an objection to the 'Soundness' of the current Local plan.

The draft local plan leaves Cams Hall as part of the retained Cams Hall E5 (was E3 in earlier draft) Employment Allocation in the current consultation draft (submission Version) of the Local Plan – see next page (pink outline).

Cont ...

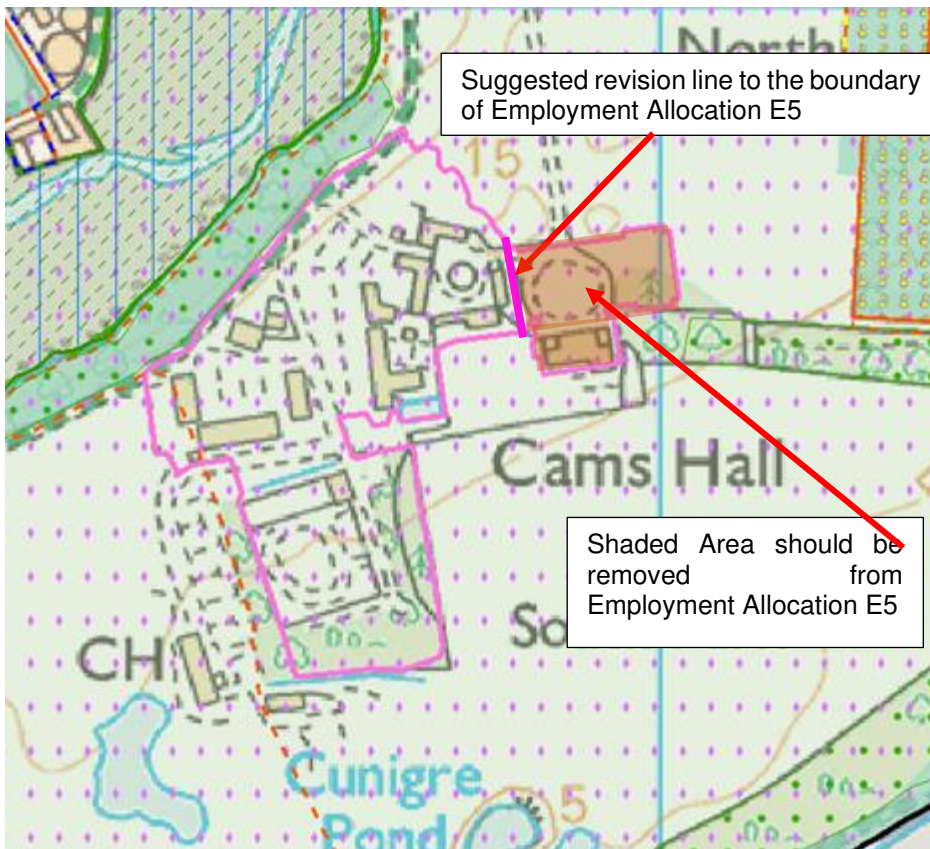


Our ref:19/097/03.01/RMc/bb  
15<sup>th</sup> December 2020  
Planning Policy, Fareham Borough Council

...3



This representation seeks an amendment to the boundary of this allocation to remove Cams Hall itself and its adjacent grounds and suggests a revision to this E5 boundary as outlined below;



Cont ...

Our ref:19/097/03.01/RMc/bb

...4

15<sup>th</sup> December 2020Planning Policy, Fareham Borough Council

---

Policy E5 includes the following text;

*The existing Employment Areas (as shown on the Policies map) will be protected for existing and new office, general industrial and storage and distribution employment uses.*

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

*a. It would facilitate the creation of additional jobs; and b. The development complies with Policy TIN1 and provides acceptable levels of parking.*

*Proposals that will result in the loss of land and/or buildings to uses other than employment within an Existing Employment Area will be permitted where policy requirements are demonstrated together with the following:*

- i. The proposals are not for residential development; and*
- ii. All appropriate alternative forms of employment use have been dismissed as unsuitable or unviable; and*
- iii. It can be clearly demonstrated that the land or building is not fit for purpose and modernisation or redevelopment for employment uses would be unviable; and*
- iv. The proposals are accompanied by details of marketing of the vacant site/building covering a period of not fewer than twelve months; and*
- v. Where proposals are for 'main town centre uses'<sup>37</sup>, such as retail and leisure facilities, but excluding offices, a full sequential assessment will be required as part of a planning application.*

The explanatory paragraph to this policy states;

*The re-use, regeneration and making more efficient use of existing employment land is consistent with the principles of 'sustainable economic growth'.*

*Policy E5 supports that intention by providing the framework to allow the regeneration and rejuvenation of the Borough's Existing Employment Areas.*

*The Council also recognises that the addition of complementary uses within Employment Areas can support the operation and function of those areas and can encourage prospective tenants/occupiers to these sites by improving the viability of future schemes.*

*Flexibility is provided to allow, under certain circumstances, the reuse of vacant land or buildings in Employment Areas with economic development, as defined by the Framework. Where proposals are for 'main town centre uses'<sup>38</sup>, such as retail and leisure facilities, but excluding offices, a full sequential assessment as set out in paragraph 86 of the NPPF will be required as part of a planning application*

The Turley representation at Appendix A also addresses the owners' concerns.

This representation raises the question of the 'soundness' of the Local Plan, which is one of the tests for Fareham's current consultation exercise.

The above policy wording does not embrace the possibility of the need to change the use of the Hall to alternative beneficial uses which would, in any event, be captured by heritage protection policies which exist not only via Historic England, but also in the NPPF and Local Plan and which have their own set of requirements – and which can be applied more logically.

Accordingly, Cams Hall should be removed from Allocation E5, such that more 'normal' development management considerations could be undertaken in assessing any change of use or development application in the future, without the need or necessity to follow the more onerous marketing and sequential test requirements of the above policy as it relates to the adjacent 'E5 Employment Allocation'.

Cont ...

**LYONS+SLEEMAN+HOARE Ltd | Architects**  
retail leisure workplace residential regeneration transport conservation masterplanning

Our ref:19/097/03.01/RMc/bb

...5

15<sup>th</sup> December 2020

Planning Policy, Fareham Borough Council

---

We would request, therefore, that this matter is put before the new Local Plan Examiner to re-consider the 'soundness' of including the Grade II\* listed Cams Hall site itself as part of the wider Employment Allocation E5, rather than allowing any future change to be considered on its merits and other 'Heritage' site protection policies.

This is especially important and has been reinforced in these 'Covid 19' times which has offered up another raft of issues relating to the uncertainty of the future of office space and a more than likely long-term downturn in demand for such accommodation.

I look forward to your confirmation of receipt and acknowledgement of this representation.

Yours faithfully



Rob McLennan  
BA (Hons), MRTPI  
For and on behalf of  
**Lyons+Sleeman+Hoare Ltd**



## APPENDIX A

4 December 2017

**Delivered by email and post**

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

Ref: WILW3015

Dear Sir/Madam,

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

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

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

#### Site Context

Cams Hall forms part of the Cams Estate, which is situated to the south east of Fareham Borough in between Porchester and Fareham. The Hall is registered as a 17<sup>th</sup> Century Grade II\* Listed Georgian mansion which has an extensive history dating back to 1086 and is referenced in the Domesday Book. The immediate land surrounding Cams Hall is documented as a Historic Park and Garden and sits within the wider Conservation Area that encompasses the Cams Estate. Other key uses within the Estate include the Cams Hall Estate Golf Course and Cams Estate business park, the latter of which initially formed around a group of buildings adjacent to Cams Hall known as Home Farm and have now been converted for office use. In planning policy terms, Cams Hall forms part of the employment allocation at Cams Estate business park although the character and physical appearance of Cams Hall is significantly different from the converted farm buildings within the business park and this is reflected in its Grade II\* Listed status.

## Current Uses

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

## Flexibility of use

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

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

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

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

## Planning Policy Position

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

Policy E3 states:

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

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

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

- d. *The design of any new buildings accords with the requirements of the design policies. Proposals for the change of use or redevelopment of vacant land and buildings to uses other than B-class employment (excluding residential) within an Employment Area will be permitted where policy requirements a-d above are demonstrated together with the following:*
- e. *all appropriate alternative forms of economic development have been considered; and*
- f. *it can be clearly demonstrated that the land or building is not fit for purpose and modernisation or redevelopment for employment uses would be financially unviable; and*
- g. *the proposal is accompanied by details of marketing of the vacant site / building covering a period of not fewer than twelve months.*

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

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

Part (f) of the policy also requires proposals to clearly demonstrate that Cams Hall is not fit for purpose and that modernisation or redevelopment for other forms of employment uses would be financially unviable. This would mean that all employment uses would have to be considered and assessed in terms of their financial viability before other uses could be considered. This part of the policy is considered over burdensome for our client and, coupled with part (g) of the policy and the additional requirements outlined in the supporting policy text in paragraphs 6.25 and 6.26, could result in significant delays to other non-employment opportunities being considered. We also note that reference has been made to paragraph 22 of the National Planning Policy Framework (NPPF) in paragraph 6.23:

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

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

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

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

#### Background Paper: Interim Employment Land Review (October 2017)

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



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

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

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

### Heritage

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

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

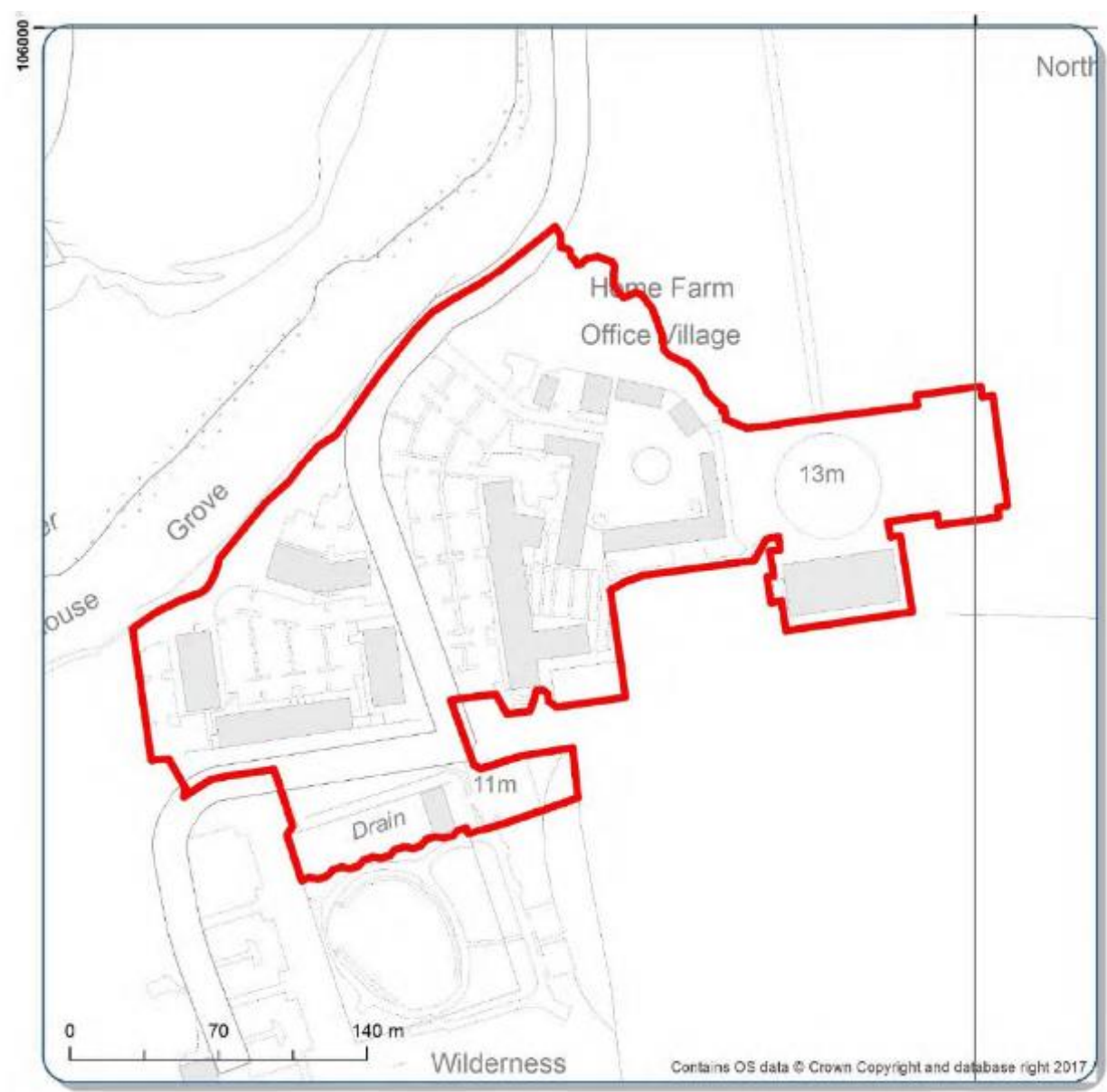
This reinforces our view that there is a need for Cams Hall to be disaggregated from the wider Cams Estate employment allocation so that a wider range of uses can be considered in the future if needed. We wish to highlight at this stage that a residential use is not under consideration by our client.

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

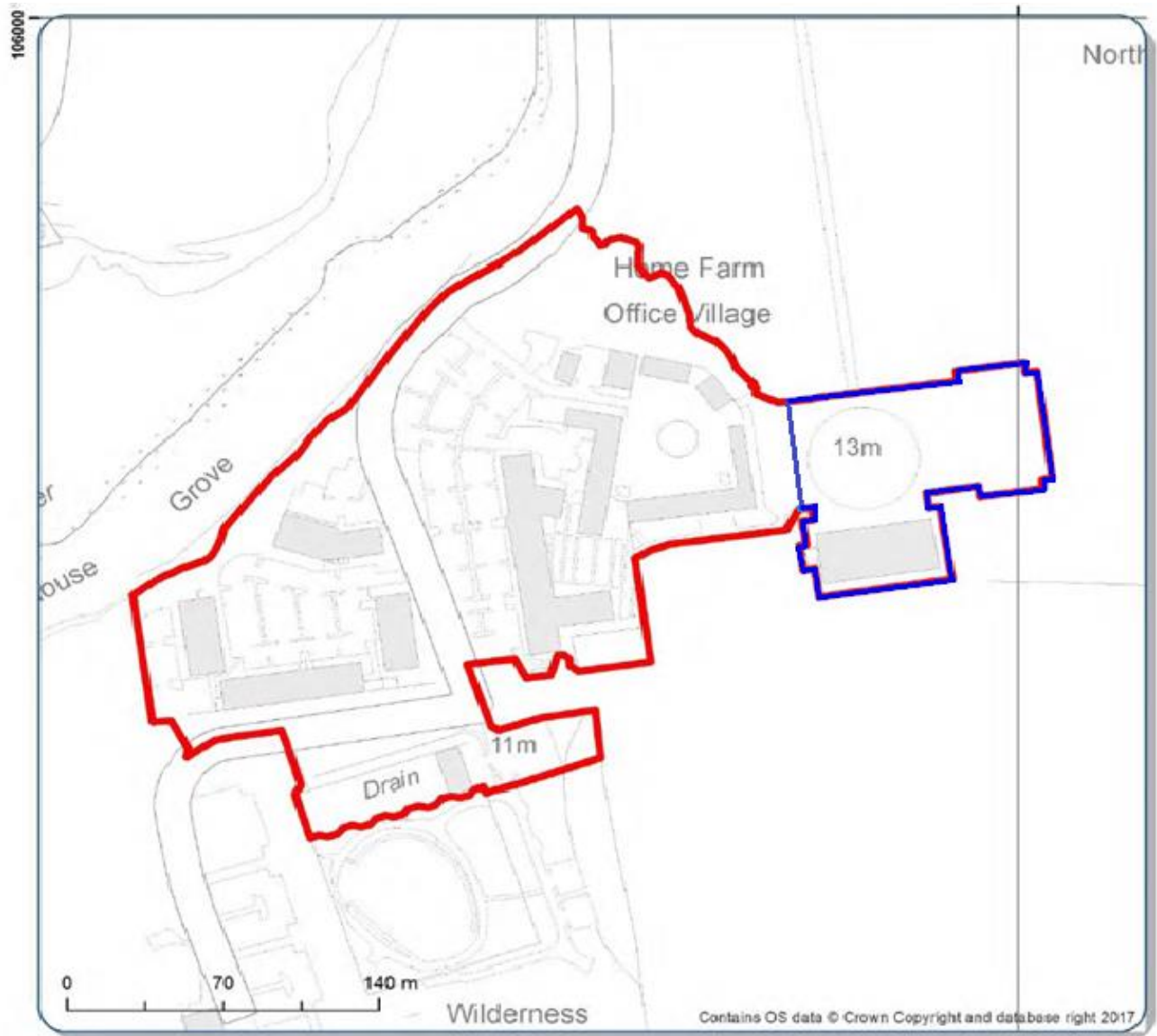
Yours sincerely

Fay Eames  
**Associate Director**





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





**Respondent details:**

Title:	Mr
First Name:	Alan
Last Name:	Williams
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	No

**Please provide details you have to support your answers above**

HA42 is unsound and potentially illegal in it's allocation of land identified as a SINC, and in relation to the drainage of the area identified as the allocation which could result in flooding of any new development or cause flooding to neighbouring development. The proximity of the allocation to the SAM also make this allocation unsound.

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

Remove the allocation.

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

By removing the allocation you remove the conflict with SINC, SAM and potential drainage issues

**Your suggested revised wording of any policy or text:**

Not required if allocation 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

**2) Policy: CC1 - Climate Change**

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

**Please provide details you have to support your answers above**

Whilst the policy may be regarded as technically legally compliant it is far from sound missing significant developments in national climate change policy and the introduction of the Future Homes Standard as likely to be the replacement of building regulations in the near future. The policy needs to be strengthened around the compliance against and exceeding energy efficiency and carbon reduction standards to prevent the building of homes that will require expensive retrofitting to improve their energy performance in the future.

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

Improve the requirement around energy efficiency in new build residential and include new commercial to be built to similar suitable standards e.g. BREAM. Explicit link and acknowledge of the likely future changes to buildings regulations e.g. Future Homes Standard and that energy efficiency standards are likely to increase in the near future.

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

By complying with upcoming changes to legislation within the lifetime of the plan

**Your suggested revised wording of any policy or text:**

This is not my job

**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

---



## **Winchester City Council response to Fareham Borough Council**

### **Regulation 19 Local Plan Consultation (6<sup>th</sup> November – 18<sup>th</sup> December 2020)**

Thank you for the opportunity to comment on your Regulation 19 Local Plan Consultation. The representations below relate to key cross-boundary issues and follow previous comments Winchester City Council has submitted in respect of earlier consultations on the emerging Local Plan, and discussions under the Duty to Cooperate.

#### **Strategic Policy DS2: Development in Strategic Gaps**

The City Council considers Policy DS2 to be sound and to satisfy the duty to cooperate insofar as it defines and protects the Meon Gap by defining the boundaries of the gap in a consistent way to those within Winchester District.

#### **Strategic Policy H1: Housing Provision**

The City Council supports the intention of Policy H1 to meet the Borough's housing requirement under the Standard Methodology and provide an element to contribute to meeting unmet need in neighbouring authorities, pending an updated Partnership for South Hampshire Joint Strategy. However, while a Local Plan is able to use the current Standard Methodology requirement and fix this on submission of the Plan, Policy H1 appears to be based on a significantly lower figure that results from a Government consultation which is not yet confirmed. Similarly, the unmet needs of neighbouring authorities will also be subject to the final Standard Methodology requirement for these authorities and their ability to provide it.

The City Council recognises the difficulties of setting a housing requirement when neither element is yet fixed, but would suggest that it may be necessary for the Plan to be updated by way of Modifications in order to be meet the tests of soundness and the Duty to Cooperate in relation to the housing requirement. Alternatively, an early review may be needed once the final requirements are clarified.

The City Council has no comments to raise in respect of the additional site allocations which are largely within the Borough's developed area and are not considered to impact significantly on Winchester City Council's area.

#### **Policy HP11: Gypsies, Travellers and Travelling Showpeople**

The City Council considers Policy HP11 to be sound as it provides for the needs of gypsies and travellers to be met. It welcomes that fact that the Local Plan has been able to identify sufficient sites to meet the Borough's need for traveller sites, but the City Council has been unable to identify sufficient plots for travelling showpeople through its Gypsy & Traveller DPD and has asked the Borough Council whether it can help meet this need during discussions under the Duty to Cooperate. While Policy HP11 may allow for permission to be granted to meet such a need, the explanatory text is not clear whether suitable sites have been sought to help meet the unmet need for travelling showpeople's sites in the south of Winchester District.

#### **Strategic Policy E1: Employment Land Provision & Policy E4: Solent 2**

The City Council supports the continued allocation of land at Solent 2 for employment use and considers this to be sound and supportive of the duty to cooperate.

Yours sincerely,

Adrian Fox

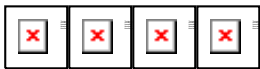
Strategic Planning Manager

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 21 December 2020 09:01  
**To:** Planning Policy  
**Subject:** Woodland Trust response  
**Attachments:** Fareham Local Plan 2037 response from Woodland Trust.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Bridget Fox (PPC) [REDACTED]  
**Sent:** 18 December 2020 22:39  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Cc:** Bridget Fox [REDACTED]  
**Subject:** Fareham local plan 2037 consultation: response from the Woodland Trust

Please find attached a response from the Woodland Trust

NB due to a temporary problem with access to Woodland Trust email, this response has been sent from my personal email account. However the official contact details are given below.

Bridget Fox

Regional External Affairs Officer - South East



Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
0330 333 3300  
[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

Stand up for trees



## **Fareham Local Plan 2037 Consultation**

**December 2020**

### **Response from the Woodland Trust**

The Woodland Trust ("the Trust") is the UK's leading woodland conservation charity, and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, covering over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

We welcome the opportunity to comment on the Fareham Local Plan 2037 publication draft.

Contact name:

Bridget Fox  
Regional External Affairs Officer - South East  
Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
Telephone: 03437705492 | Mobile: 07787104762  
Email: [BridgetFox@woodlandtrust.org.uk](mailto:BridgetFox@woodlandtrust.org.uk)

- I am willing for my contact information to be shared.
- The Woodland Trust is willing to give evidence at the Examination in Public.

Please find below the Trust's comments on individual policies.

## Policy CC1: Climate Change

We welcome the priority given to tackling climate change. This policy sets strategic policy aims including c) integrating Green and Blue infrastructure, and refers to the intention to improve tree canopy cover. However, it fails to set any specific policy requirements or targets that will deliver this policy and so risks being unsound in practice. In order to be sound, we recommend a more specific and robust policy wording.

This should include policy in support of new tree planting and woodland creation. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change, to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity. We recommend setting a target for borough-wide tree canopy cover as part of this policy.

We further recommend setting a target for tree canopy cover on individual development sites, ideally of 30 per cent, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

### Proposed amendment

Expand c) as follows:

*c) Integrating Green and Blue Infrastructure into the design of developments through approaches such as mandatory biodiversity net gain; a minimum of 30% tree canopy cover, which will help to reduce CO2 concentrations and mitigate the urban heat island effect; and the use of Sustainable Drainage Systems which helps reduce the risk of flooding.*

### Reason

The independent Committee on Climate Change recommends increasing woodland cover in the UK from 13% to a minimum of 15% by 2035 and 18% by 2050, to ensure the country achieves net zero carbon emissions. Development sites make an important contribution to this target. By setting a 30% canopy cover target for development sites as part of wider Green Infrastructure and net gain requirements, local authorities can help deliver the necessary overall increase to 18%.

Further information can be found in the Trust's [Emergency Tree Plan](#) (2020) <sup>1</sup>.

---

<sup>1</sup> <https://www.woodlandtrust.org.uk/media/47692/emergency-tree-plan.pdf>

## **Policy NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network**

This policy wording is permissive rather than explicitly ruling out development that adversely affects protected sites. We fear that this risks being unsound in failing to afford adequate protection to ancient woodland and veteran trees.

We welcome the explanatory wording in paragraph 9.15 “Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are reasons of overriding public interests and a suitable compensation strategy” and would like to see that incorporated directly into the policy.

### **Proposed amendment**

In order to make the policy sound, we ask that it be strengthened it, based on the on the wording recommended by the Woodland Trust, either by adding this wording to NE1 or alternatively to Policy NE6 Trees, Woodland and Hedgerows.

- i. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.*
- ii. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.*
- iii. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.*

### **Reason**

The National Planning Policy Framework (NPPF) (paragraph 175c) states: “When determining planning applications, local planning authorities should apply the following principles: ..... c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.

Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable.

Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced



by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.

Further information is available in the Trust's [\*Planners' Manual for ancient woodland \(2019\)\*](#)<sup>2</sup>.

---

<sup>2</sup> <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

## Policy NE6 Trees, Woodland and Hedgerows

This policy wording is permissive rather than explicitly ruling out development that adversely affects protected sites. We fear that this risks being unsound in failing to afford adequate protection to ancient woodland and veteran trees.

It is also insufficiently robust in specifying the level of replacement where woodland and trees are removed in order to deliver net gain in line with policy NE2. The explanatory wording in paragraphs 9.84 and 9.85 indicate a welcome presumption against loss of existing trees and woodland, in particular ancient woodland and veteran trees, but are insufficiently robust in our view.

Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.

For other trees, we recommend setting a proposed ratio of tree replacement, with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.

### Proposed amendments

#### Amendment 1

In order to make the policy sound, we ask that it be strengthened it, based on the on the wording recommended by the Woodland Trust, either by adding this wording to NE6 or alternatively to Policy NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network.

- i. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons.*
- ii. As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss.*
- iii. Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.*

### Reason

The National Planning Policy Framework (NPPF) (paragraph 175c) states: “When determining planning applications, local planning authorities should apply the following principles: ..... c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.

Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable.

Further information is available in the Trust's [\*Planners' Manual for ancient woodland \(2019\)\*](#)<sup>3</sup>.

## Amendment 2

We propose amending the final lines of Policy NE6 to read

*"The removal of protected trees, groups of trees (including veteran trees), woodland (including ancient woodland) or hedgerows will only be permitted in wholly exceptional circumstances. Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost. Where protected trees, woodland and hedgerows are subject to removal, a replacement of an appropriate number, species and size in an appropriate location will be required, at a level that will deliver net gain in tree canopy cover."*

## Reason

The current policy fails to specify adequately the level of replacement required to meet statutory biodiversity obligations including the emerging requirement to deliver biodiversity net gain. In addition, the policy fails to ensure increased tree canopy cover at a time when such increases are a goal of national and local policy.

Further information is available in the Trust's guidance on [\*Local Authority Tree Strategies\*](#) (2016)<sup>4</sup>.

---

<sup>3</sup> <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

<sup>4</sup> <https://www.woodlandtrust.org.uk/publications/2016/07/local-authority-tree-strategies/>

## Policy NE10: Protection and Provision of Open Space

We support the policy that residential development will be required to provide open and play space to meet the needs of new residents. In addition, we recommend including standards for access to natural green space and woodland for existing and new developments.

### Proposed amendment

To expand the final lines of policy NE10 as follows:

*“Residential development will be required to provide open and play space to meet the needs of new residents, including access to natural green space and woodland in line with the Accessible Natural Greenspace and Woodland Access Standards. Where possible, development shall address any additional identified deficiencies in open space highlighted within the most recent Open Space study.”*

### Reason

Without specific standards, the policy risks being ineffective and therefore unsound.

Natural England’s Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:

- Of at least two hectares in size, no more than 300m (five minutes’ walk) from home.
- At least one accessible 20-hectare site within 2km of home.
- One accessible 100-hectare site within 5km of home.
- One accessible 500-hectare site within 10km of home.
- A minimum of one hectare of statutory local nature reserves per 1,000 people.

The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.

Further information is available in the Trust’s guidance [\*Residential developments and trees\*](#) (2019).<sup>5</sup>

---

<sup>5</sup> <https://www.woodlandtrust.org.uk/media/1688/residential-developments-and-trees.pdf>

## **Policy HA27, Rookery Avenue, Sarisbury.**

As the draft policy notes, this site is adjacent to ancient woodland at Gull Coppice. Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

### **Proposed amendment**

Add the following to f) ... *Proposals should seek to enhance the Gull Coppice SINC, while maintaining a 50m protective buffer.*

### **Reason**

In line with the NPPF protection for ancient woodland, buffers shield ancient woodland from damaging edge effects such as encroachment, fragmentation and pollution. If a 50m buffer is not accepted at this location, then we would still recommend specifying a minimum 15m buffer, in line with Natural England's guidance.

Well-planned buffers can offer recreation opportunities as well as contributing to biodiversity net gain. The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat. The consequent increase in ecological connectivity between areas of ancient woodland will create the resilient landscapes recommended in *Making Space for Nature* published by Defra (2010).

Further information is available in the Trust's [Planners' Manual for ancient woodland \(2019\)](https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf)<sup>6</sup>.

END

---

<sup>6</sup> <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

**Respondent details:**

Title:	Mrs
First Name:	Jill
Last Name:	Wren
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

**1) Paragraph: 1.11**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

**2) Paragraph: 1.14**



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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

### 3) Paragraph: 3.27

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

#### 4) 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**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

#### 5) Paragraph: 4.4

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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) Paragraph: 4.5**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The Publication Plan is invalidated as a result of implementing the wrong algorithms for Housing Needs.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

**Respondent details:**

Title:	Mrs
First Name:	Jane
Last Name:	Wright
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	Please select your title
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**

Para 1.5 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.

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

Allow the public to be able to fully share their opinions and have their say now.

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

The Public should be given the chance they were denied earlier in the process.

**Your suggested revised wording of any policy or text:**

Not sure

**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: 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

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!

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

We should take our fair share of housing but no more.

### 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: HP4 - Five-year Housing Land Supply

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

### Please provide details you have to support your answers above

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.

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

The LPA should consider alternative access points onto other streets than Brook Lane or reduce the number of dwellings

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

By reducing the impact of traffic and potential accidents.

**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

---

#### 4) Paragraph: 10.15

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

**Please provide details you have to support your answers above**

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.

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

Reduce the numbers of dwellings. Ensure there are adequate parking facilities within the site. It is already very hard to park in the center of Warsash and the additional cars will exacerbate the problem.

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

?

**Your suggested revised wording of any policy or text:**

Not sure

**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: 7.18

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

**Please provide details you have to support your answers above**

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?**

We should be encouraging people to shop locally and not to drive to shopping centres causing extra traffic on local roads. Also taking business from local shops and services.



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

not sure

**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

---

## 6) Paragraph: 10.26

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

**Please provide details you have to support your answers above**

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..

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

The large number of additional houses planned for Warsash will place a burden on the already stretched doctors surgeries and Dentists in the area.

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

A current analysis of health care requirements needs to be undertaken.

**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:	Mr
First Name:	Russ
Last Name:	Wright
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

**1) Paragraph: 1.11**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

The Plan needs to be revised inline with the latest methodology for calculating Housing Needs in the Borough

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

Would bring the Plan into line with Central Government Policy

**Your suggested revised wording of any policy or text:**

Not applicable - Plan needs complete rewriting

**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: 1.14**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

LPA needs to completely review its Housing Needs in line with Central Government Policy by using the new Algorithm

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

Rewrite the Borough's Housing Needs, using the latest Policy for calculation

**Your suggested revised wording of any policy or text:**

Not Applicable - Needs review of entire 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: 1.38

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

Timescales need to be re calculated based on new Housing Need Calculation

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

Change all the dates to allow for new figures to be determined based on latest Central Government Methodology

**Your suggested revised wording of any policy or text:**

N/A - Plan needs complete overhaul in view of Housing Need calculations are Flawed!

**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: 3.19

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

#### 5) Paragraph: 3.2

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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) Paragraph: 3.27

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

## 7) 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**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards.

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

---

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

**8) Paragraph: 4.5**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The current Plan is made invalid as a result of implementing the wrong algorithms for Housing Needs

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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

**9) Paragraph: 1.12**

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

**Please provide details you have to support your answers above**

The LPA has relied on a recently-proposed (but not adopted) Central Government algorithm for deciding where houses should be located. As this has now been updated, with an emphasis on brownfield sites and sites in the North and the Midlands, the LPA needs to revise its methodology and calculations for Housing Needs in the Borough as a whole and in particular in strategic sites such as within Warsash and the Western Wards. The current Plan is made invalid as a result of implementing the wrong algorithms for Housing Needs



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

The LPA should use the latest methodology for calculating Objectively Assessed Housing Need in line with Central Government Policy

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

The Plan should implement the new algorithms for calculating Housing Need

**Your suggested revised wording of any policy or text:**

Not Applicable - The Local Plan needs to be completely revised to incorporate the Government's latest Standard methodology for calculating Housing Needs in 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

---

## Keely, Lauren

---

**From:** Spencer Wright [REDACTED]  
**Sent:** 16 December 2020 11:25  
**To:** Consultation  
**Subject:** Representation  
**Attachments:** 3236\_001.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi,  
Please find my form attached, please acknowledge receipt.  
Happy Christmas

Spencer

IMPORTANT: This message is private and confidential. If you have received this message in error, please notify us and remove it from your system.

Please note that occasionally email enquiries don't actually reach us. Due to ever tightening anti-spam software on the web and mail servers. There is no real rhyme or reason to this so if we have not responded to your enquiry within 48 hours then please give us a call on 01489 773 800 as we will NEVER intentionally ignore you.

Spencer Wright  
PVC Building Supplies Ltd

**Tel:** 01489 773 800  
**Fax:** 01489 773 808  
[REDACTED]

Follow us on Twitter



**PVC Building Supplies Ltd**

Unit 28a  
Shamblehurst Lane  
Hedge End  
Southampton  
Hants SO30 2FX

Company No.1950332 | VAT No. 107885057

**Disclaimer:**

This message contains confidential information and is intended only for consultation@fareham.gov.uk. If you are not an intended recipient you should not disseminate, distribute or copy this e-mail. Please notify spencer.wright@pvcbuildingsupplies.com immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Spencer Wright therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

A1 Is an Agent Appointed?

☐ Yes

☒ No

A2 Please provide your details below:

Title:

Mr.

First Name:

Spencer

Last Name:

WRIGHT

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:

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?

I need to be consulted

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):

TBH im not sure I do. I just wish to be consulted. If this is the means of doing so then im happy to take part.

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:	Ronald
Last Name:	Wyatt
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**

This site is shown in the Hamble Valley of Special Landscape quality yet paragraph 3.9 says that there "remain no development allocations in these areas". That is an untrue statement. The plan states that as of 1st July 2020 outline planning was granted. This is also an untrue statement. One has to ask whether the council had already predetermined this site. That would be unlawful. HA32 is subject to a live judicial review as it fails Fareham's own extant plan requirements. It is not adjacent to the urban boundary (against DSP40). The site is subject to a legal challenge (already delivered to Fareham Council) that it is not deliverable as it does not include land required to meet a public highway (also against DSP40). HA32 is also only 200metres from the protected Natura 2000 Sites and only 34 metres from ancient woodland. HA32 should be removed from the plan as a developable site.

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

The removal of HA32

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

Remove HA32

**Your suggested revised wording of any policy or text:**

Not applicable if the site was removed and the plan is shaded in the same way as all the countryside area around it in Fig. 3.3

**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 the Chairman of Brook Avenue Residents Against Development. As there is a live Judicial Review taking place regarding HA32 the situation could change and I wish to reserve my right to update and add evidence.

---

## 2) 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**

HA1 is still in the extant development plan (2015) as countryside. Although para.4.8 allows the planning authority to consider sites in the previously adopted plan, HA1 was never included in the 2015 plan.. It should never have allowed development on HA1. It is a large site yet designated for over 800 houses but being developed in a piecemeal way. It is unsound for such a large development not to have an overarching environmental assessment. We are told by the Leader of the Council that Fareham will have a 22% reduction in housing need yet this site's allocation has grown by 20%. Given that HA1 is 62% of all Fareham's housing (excluding Welbourne) we have a reduced need and 11 other sites were withdrawn from development in this plan, I would contend that the plan did not consider development sites objectively and rationally.

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

HA1 development should be stopped. It shouldn't have gone ahead to the point where it is now and certainly should not go any further until it is more coherent. It requires an overall strategy for environmental, recreational, road and school issues

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

It would allow the planning authority to address the shortcomings in the way this area is being handled. In doing so it could rebalance the development across the borough which in turn would help address the other issues I raise.

**Your suggested revised wording of any policy or text:**

I will leave that to those of better brain.

**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: HP2 - New Small-scale Development Outside Defined Urban Areas

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



### **Please provide details you have to support your answers above**

Section 5.15 Policy HP2 is poorly worded. It allows a loophole which will be very hard to defend. It will allow small scale developments just about anywhere there is an existing house in the countryside. The result will be a proliferation of housing in areas that are currently rural but which will become semi rural and eventually urban. Point 1 is linked to point 2 with the word or and the statement contains a subjective element that is too widely drawn. Point 1 says "The site is within or adjacent to existing areas of housing; or 2. The site is well related to the settlement boundary" There are areas outside the urban area which are rural but have 2 or three well spaced houses. Under statement 1. above, a site next to one of them will become another development plot. Once that is built the next one will be subject to the same and so on. Statement 2 "The site is well related to the settlement boundary". means very little and is purely subjective. These 2 statements also contradict items 2 and 9 on the list of strategic priorities set out for the plan.

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

It requires a rewording of the following statement. 1. "The site is within or adjacent to existing areas of housing; or The following statement should be removed "2. The site is well related to the settlement boundary;"

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

It would ensure that officers of the authority when making recommendations to the planning committee are working on a set of objective criteria, free from any personal interpretations.

### **Your suggested revised wording of any policy or text:**

1. "The site is within existing areas of housing. Development will not be allowed on plots next to housing outside the countryside where no buildings currently exist (i.e current brownfield sites).

### **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: DS3 – Landscape**

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

### **Please provide details you have to support your answers above**

This policy is not consistent. Areas of Special Landscape Quality have been identified in the Borough and are shown on the Policies map. Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced." However the last paragraph says "Major development proposals must include a comprehensive landscaping mitigation and enhancement scheme". The question must be Why are major developments being considered at all in these areas. Once they are built "Major developments by definition will change the character It is contradictory and unsound.

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

The paragraph needs to be consistent in its objectives

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

The paragraph which starts "Major developments" should be removed. By doing so it does not prevent applications being made but it does prevent another potential loophole and lack of clarity which will lead to further appeals.

### **Your suggested revised wording of any policy or text:**

Remove the word "major" and replace with "any"

**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:	Valerie
Last Name:	Wyatt
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	
Postcode:	
Telephone Number:	
Email Address:	

**1) Paragraph: 5.15**

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

**Please provide details you have to support your answers above**

New Small -Scale Development Outside Urban Areas. Points 1-4 include phrases such as 'high frequency' 'well related' 'space between buildings' etc. which are very subjective and open to interpretation which make this policy unsound; developers will use it to manipulate the council into granting permission when it is not appropriate. This is likely to conflict with the following Strategic Priorities listed in para 2.12 and would therefore not be legally compliant: 2. 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. 9. Protect and enhance the Borough's landscape features, valued landscapes, biodiversity, green infrastructure networks and the local, national and international sites designated for nature conservation. The council has shown itself to be unwilling to stick to DSP40 criteria in the extant plan as witnessed by the Egmont Nurseries example - a site in the countryside 200 metres from the River Hamble and adjacent to the Local Nature Reserve 34m from ancient woodland.

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

The criteria should be better defined as per point 5 which defines the number 4 as the maximum that will be considered.

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

It would give the council a firmer basis on which to defend the policies it sets store by and which local residents agree are important as demonstrated in the consultation process. Protecting the remaining green spaces and valued landscapes are a priority for the community. Biodiversity legislation is in place and the council risks contravening this by caving in to the developers who threaten to go to appeal.

**Your suggested revised wording of any policy or text:**

I am not qualified to suggest wording.

**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: 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**

I have copied the text of this paragraph below. It contains a false statement and therefore I consider it to be not legally compliant and unsound. A small block has been cut out of the Area of Special Landscape Quality in Figure 3.3 to the north of Warsash and the west of Locks Heath. This is in the area of the Hamble Valley referred to in the paragraph and is Housing Allocation Policy:HA32 Egmont Nursery. The detail is on page 98 of the Publication Plan. There is another falsehood on that page; its planning status as at 1 July 2020 says 'Outline planning permission granted (P/18/0592/OA)'. This is not true. The planning committee resolved to grant permission on 19th August 2020. The decision notice is dated 1st October 2020. It is now the subject of a Judicial Review as local residents believe that it was unlawful to grant permission for a number of reasons including a failure to follow policies in the extant plan. 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.

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

They should either correct the information in the paragraph or, better still, remove this allocation from the plan completely.

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

It would be factually correct. I would think that a plan should be factually correct to be legally compliant and sound.

**Your suggested revised wording of any policy or text:**

If HA32 remains in the plan then the wording should be For these reasons there remain no development allocations in these areas except for HA32 in the Hamble Valley.

**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: 3.14**

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

### **Please provide details you have to support your answers above**

The paragraph gives a green light to any developer wishing to build in the countryside areas of the borough using this as an excuse. They can divide up sites to fit the 1 ha pattern described here. I understand that this is known as salami slicing and is not sound. The terms used in the paragraph (copied below) are sufficiently vague, e.g. in keeping, to allow developers to lean on officers to recommend permission. 3.14 The National Planning Policy Framework (NPPF) recognises the need to ensure that there is diversity within the housing market and acknowledges the role that small to medium sites (of less than one hectare) can bring to any development strategy both in terms of ensuring a supply of deliverable sites that can be relied upon within the first few years of a Local Plan and the fact that small sites help to diversify the housing product, such as by encouraging people who wish to build their own homes. For this reason, the proposed Development Strategy provides a new policy tool to allow small-scale development in the countryside where it can be demonstrated that the location is sustainable in terms of access to local facilities and services, and that the development would be in keeping with the character and pattern of the existing settlement. While the policy applies to the whole Borough, its specific wording means that it can only be applied in certain areas where particular criteria are met. The new policy can be viewed in full in the housing chapter (Chapter 5) and will be subject to regular monitoring to ensure that it is achieving the desired effect.

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

This should be looked at again to close loopholes for salami slicing.

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

Tighter wording

### **Your suggested revised wording of any policy or text:**

I am not qualified to do this.

### **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**

This Housing Allocation should be removed from the plan pending the outcome of the Judicial Review that is underway. The planning status given on page 98 is untrue. As at 1 July 2020 the status was 'still under consideration' To publish the Housing Allocation in this way could be seen as the council being 'pre-determined' on the matter as it had yet not followed the legal process to that point where it was legally granted. The council ignored the policies in the extant plan to recommend and then resolve to grant permission on 19th August 2020. The site is not adjacent to the urban boundary and is in a sensitive location less than 200m from Natura 2000 sites. It is adjacent to Holly Hill Nature Reserve. Ancient woodland is located only 34 metres from the boundary of the site. The Areas of Special Landscape Quality shown in Figure 3.3 has this allocation shown to the north of Warsash and the west of Locks Heath as a small cut out. This is the only such cut out and makes absolutely no sense at all and is therefore unsound. It is also counter to the Strategic Priorities points 2 and 9 in 2.12 of this plan and therefore inconsistent which must also make it unsound.

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

Take out HA32 as a Housing Allocation

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

Take out HA32 as a Housing Allocation

**Your suggested revised wording of any policy or text:**

Take out HA32 as a Housing 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

---

**5) Policy: DS3 – Landscape**

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

**Please provide details you have to support your answers above**

This entire policy contradicts other parts of the plan as it allows even major development throughout the Areas of Special Landscape Quality. It says "Major development proposals must include a comprehensive landscaping mitigation and enhancement scheme to ensure that the development is able to successfully integrate with the landscape and surroundings." All a developer will need to do is get a consultant to put together a report that says that it integrates successfully and the proposal will get through. Mitigation as an option is an even greater certainty as they can just buy some credits with a scheme. This totally contradicts the green and environmental aspirations that have been much heralded in all the material put out by the council in issues of Fareham Today as well as the Strategic Priorities 2 and 9 (Paragraph 2.12).

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

Remove this or re-write it to give real protection to these landscapes.

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

Remove this or re-write it to give real protection to these landscapes.

**Your suggested revised wording of any policy or text:**

Not for me to do as I am not a planning expert.

**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: HP4 - Five-year Housing Land Supply**

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

**Please provide details you have to support your answers above**

This policy replaces a similarly worded one in the extant plan (DSP40). That has clearly failed to be effective and this one is just as lacking as Housing Allocations HA1 and HA32 are included in the plan but do not meet the criteria for development in this policy. A plan with these contradictions built into it is clearly unsound and therefore not legally compliant as the plan must be sound.

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

Remove HA1 and HA32 and tighten up HP4

---



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

HP4 should be written in such a way that there is absolutely no doubt. The words 'meet all of the following criteria' are obviously open to interpretation by officers although I fail to see why they have trouble with it.

**Your suggested revised wording of any policy or text:**

Perhaps 'For the avoidance of doubt - that is every single one of the criteria not just some of the criteria.' should be added before the criteria to make the message less easy to misinterpret.

**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: 10.15**

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

**Please provide details you have to support your answers above**

The Atkins Transport Assessment used to inform this paragraph does not take into account the volume of traffic now likely from the increased number of dwellings proposed in the plan. It is out of date and therefore the plan is unsound to rely on it and if it is unsound I would think it is not legally compliant. 6.10 in the report refers to Greenaway Lane only being used for access to properties that front it whereas the plan now shows many more using it. A large proportion of the increased traffic will need to use the junction of Brook Lane and Lockswood Road. The report rightly forecasts a severe impact on this junction but unlike other junctions there is no suggestion that there is a mitigation option. This is possibly because the physical constraints of the land do not allow for it. This is just one junction that is currently under severe stress. Others are already over capacity and none of the proposed Warsash houses is occupied.

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

Re-do the transport assessments properly.

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

Up to date and realistic evaluations might make a difference to the quantum of development proposed for this area.

**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)?**

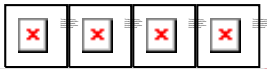
No, I don't want to take part in a hearing session

**Keely, Lauren**

---

**From:** Consultation  
**Sent:** 18 December 2020 10:47  
**To:** Planning Policy  
**Subject:** WYG (on behalf of Vistry Group) response  
**Attachments:** Appendix 3 - Site Access drawing SK05.pdf; FBC reg 19 rep Pinks Hill (18.12.2020).pdf; reg 19 rep form - 17.12.20.pdf; Appendix 1a - FBC plan sup rep (Feb 2020).pdf; Appendix 1c - FBC Draft Local Plan 2017 rep (Dec 2017).pdf; Appendix 2 - HCC response relating to app 19-0894-OA.pdf

Katherine Trott  
Engagement Officer  
Fareham Borough Council  
01329824580



---

**From:** Billington, Nick [REDACTED]  
**Sent:** 18 December 2020 10:00  
**To:** Consultation <Consultation@fareham.gov.uk>  
**Subject:** FBC Local Plan regulation 19 consultation response - Vistry Group

Dear Sir/Madam,

Please find attached our representation on behalf of Vistry Group in relation to the current regulation 19 consultation on the FBC Local Plan. Please can you confirm receipt of all six attachments which constitute our representation and that it will be considered ahead of and as part of the examination into the local plan.

Kind Regards,

**Nick Billington**  
Associate Director - Planning

**WYG will be rebranding to Tetra Tech at the start of 2021**

**WYG**

The Pavilion, 1st Floor, Botleigh Grange Office Campus, Hedge End, Southampton, Hampshire, SO30 2AF  
[REDACTED]

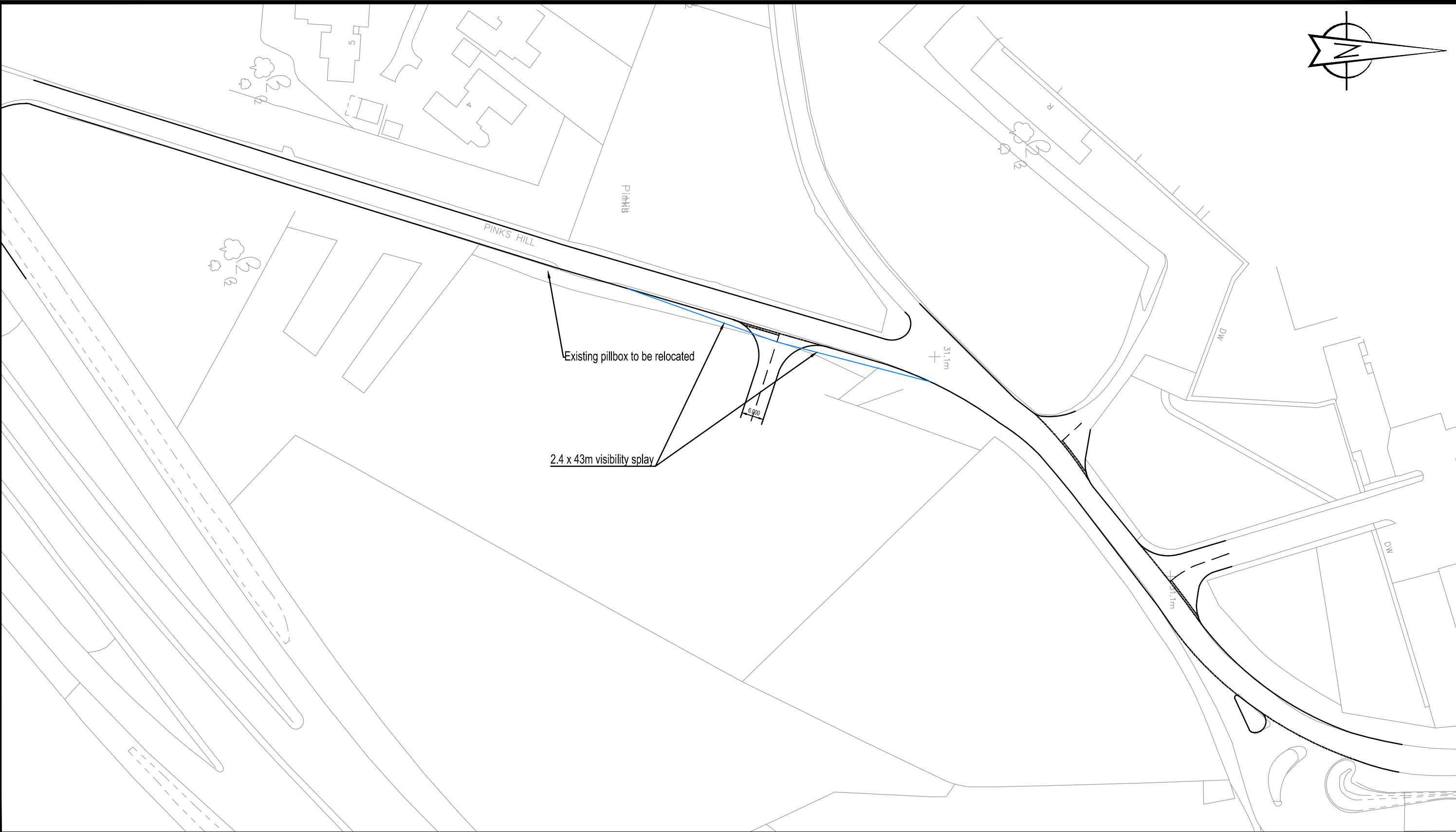
[www.wyg.com](http://www.wyg.com)

**Note:** My email address has changed to [\[REDACTED\]](mailto:[REDACTED]). Emails sent to my old @wyg.com address will be automatically forwarded to my new email address for the time being but please use my new address where possible. All other contact details remain unchanged. Thank you.

WYG Environment Planning Transport Limited. Registered in England number: 03050297.  
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds LS1 4ER. VAT No: 431-0326-08.







REV	DETAILS	DRAWN	CHECKED	DATE	PROJECT: Land East of Military Road, Fareham				CLIENT: Linden Homes		
					DRAWING TITLE: Proposed Realignment of Pinks Hill				<div>WYG Transport</div> <div>part of WYG group</div> <div>wyg</div>		
					DRAWN: GS	CHECKED: MA	DATE: 26.07.2017	SCALES: 1:1000	SHEET SIZE: A3	DRAWING NUMBER: A094723-SK05	REVISION:

NOTE: THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN WYG ENVIRONMENT PLANNING TRANSPORT LTD. IT MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR PRIOR WRITTEN CONSENT.

# **Fareham Borough Council Local Plan 2037 Consultation (Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012)**

## **Consultation Response Pinks Hill, Wallington**

**Prepared on behalf of Vistry Homes Limited  
December 2020**

## Document control

Document:	Fareham Local Plan 2037 Reg 19 consultation	
Project:	Pinks Hill, Wallington, Fareham	
Client:	Vistry Homes Limited	
Job Number:	HP16040-A097690	
File Origin:	\\southampton14\Shared\data\2007\Linden\HL07009 - HL04000-61 Pinks Hill, Fareham\reg 19 rep	
Revision:	Final	
Date:	18.12.20	
Prepared by	Checked by	Approved by
Nick Billington	Chris Lyons	Chris Lyons



## Contents

1.0	Introduction .....	3
2.0	Local Plan Housing Strategy .....	4
3.0	Sustainable Development at Pinks Hill .....	6
4.0	Other Policies .....	10
5.0	Conclusion .....	14

## Appendices

Appendix 1a – FBC Local Plan Supplement Consultation Response (Feb 2020)

Appendix 1b – FBC Local Plan 2036 Consultation Response (Dec 2017)

Appendix 2 – Hampshire County Council Response to app 19/0894/OA in relation to Pinks Hill road

Appendix 3 – Site Access Drawing SK05

## 1.0 Introduction

- 1.1 These representations have been prepared by WYG on behalf of Vistry Group who have an interest in the land at Pinks Hill, Fareham which is in a single ownership. The Group was formed in January 2020 following the successful acquisition by Bovis Homes Group PLC from Galliford Try Plc of Linden Homes and their Partnerships & Regeneration businesses. Vistry Partnerships is the Group's affordable homes and regeneration specialist. Working in close partnership with housing associations, local authorities and government agencies, it is one of the UK's leading providers of affordable housing and sustainable communities.
- 1.2 This representation follows various previous representations made during the preparation of the Fareham Borough Council (FBC) plan. Most recently this included a representation in relation to the FBC Draft Local Plan 2036 Supplement in January 2020. Our previous representations are appended at Appendix 1. The site has previously also been promoted as part of the Council's Call for Sites and Draft Local Plan Regulation 18 consultation, and these previous representations remain valid.
- 1.3 This representation relates to Fareham Borough Council's Regulation 19 consultation in relation to the Fareham Borough Council Local Plan 2037 (hereafter referred to as 'the plan').
- 1.4 The site extends to approximately 5.3 hectares and had, until the publication of the current version of the plan, been proposed by FBC for allocation for residential development, with an indicative capacity of 80 dwellings, in the Fareham Borough Draft Local Plan (2017) under Policy HA8.
- 1.5 These representations consider the Local Plan and the supporting evidence base, which are the subject of a Regulation 19 Consultation which runs until 18th December 2020, focusing on whether it: has been positively prepared; is legally compliant and sound; and whether the duty to cooperate has been met. This document will demonstrate that the decision to seek to deliver a lower number of houses than the adopted Method for Calculating Housing Need requires is not justified or sound and undermines the Council's Duty to Cooperate. It will then go onto show that the removal of draft policy HA8 is not justified by the sites available, achievable and deliverable status and its highly sustainable location in Wallington, which is borne out by the Council's own evidence.

## 2.0 Local Plan Housing Strategy

- 2.1 On the 22nd of October 2020 FBC's Cabinet? approved the publication Local plan for regulation 19 consultation ahead of submission to the Secretary of State for independent examination. The publication of the 'submission' local plan followed several previous iterations, tweaks and consultation on the emerging plan. This included major changes to the plan in 2018 and 2019 to accommodate additional housing to reflect the Government's adopted Method of Calculating Housing Need.
- 2.2 In August 2020 the Government published a document entitled 'Changes to the current planning system', which proposed an alternative Standard Method for Assessing Housing Numbers in strategic plans (hereafter referred to as the 'SMAHN'). The current iteration of The Plan was subsequently based on the SMAHN.
- 2.3 On the 16<sup>th</sup> December 2020 the Government announced their response to the consultation, confirming that they "...have decided the most appropriate approach is to retain the standard method in its current form".<sup>1</sup> Alongside the announcement, the Government published a table confirming the indicative local housing need for Fareham would be 514, the same need as identified by FBC in their Local Plan Supplement. The Planning Practice Guidance has also been updated to reflect the announcement.
- 2.4 We appreciate the untimely change in approach by central government has placed the council in a difficult position. However, for the plan to be 'sound' the housing requirement will need to be revised to reflect the latest planning practice guidance. Owing to the resultant and significant changes this entails, we are of the view that a further round of consultation should be undertaken prior to The Plan's submission. This representation is made on the assumption that FBC will review their approach in light of the Government announcements and changes to the PPG in relation to calculating housing need made on the 16th December 2020. If the plan is submitted in its current form, we request the opportunity to participate in and comment further on the currently proposed housing requirement and the methodology behind it.
- 2.5 Vistry Group maintain that site HA8 remains available and deliverable and can help meet the council's housing requirement in the short term.

---

<sup>1</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system> [accessed 16.12.2021]

Summary

- 2.6 In summary, there have been fundamental changes in circumstances since The Plan was produced. As a result The Plan in its current form fails to deliver the housing the area needs owing to the abandonment of the proposed revisions to the SMAHN. Consequentially, Policy H1 relating to the strategy to deliver the housing the area needs is therefore unsound. The current adopted housing method would represent a far more robust starting point to help deliver the housing the Borough requires.

## 3.0 Sustainable Development at Pinks Hill

- 3.1 Vistry Group (which encompasses Linden homes) has previously submitted various promotion documents and representations confirming that the site is deliverable, achievable and suitable for development. Our previous site promotion has demonstrated that development of the site represents sustainable development in an accessible location. Until this most recent iteration of the plan, the site had been proposed for allocation with reference HA8, which demonstrates that FBC also considered it a suitable site for development.

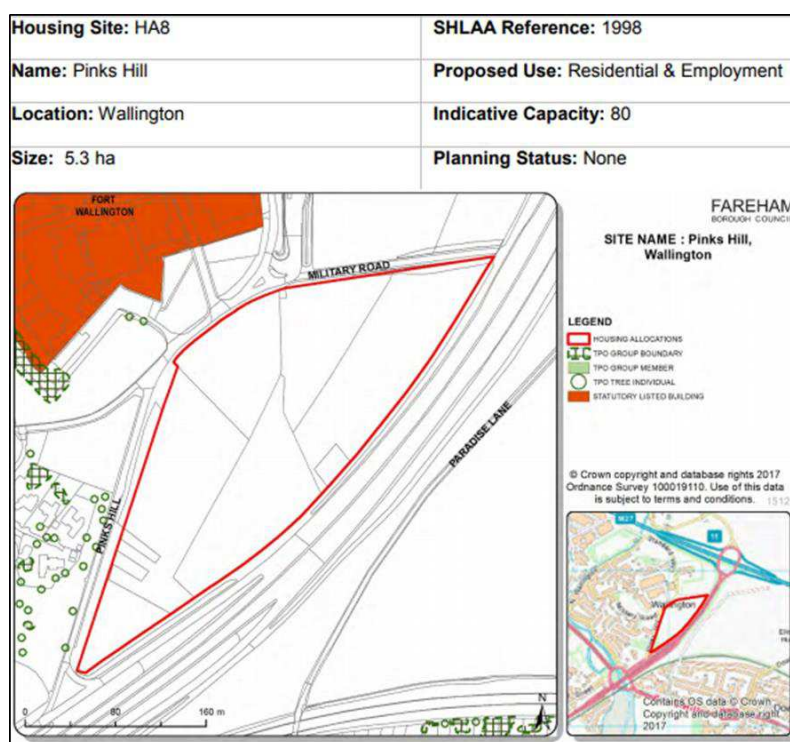


Figure 1 - Extract from Fareham Draft Local Plan (2017)

- 3.2 The January 2020 consultation on the local plan supplement continued to consider the site in accordance with the Council's intended strategy for development as the extract from the 2036 supplement demonstrates, showing Pinks Hill continuing to be allocated:

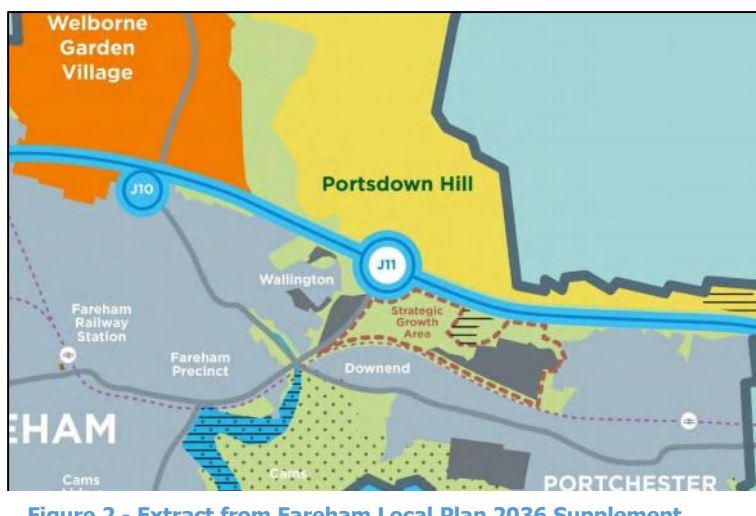


Figure 2 - Extract from Fareham Local Plan 2036 Supplement

- 3.3 However, the regulation 19 plan, subject of this consultation, excludes the site from allocation,. Given the change in circumstances and the resultant uplift in housing requirement, Vistry Group can confirm that site HA8 remains available and developable for reasons set out below.
- 3.4 Firstly, the site is within walking and cycling distance of a range of facilities, including Fareham Town centre. It also has excellent access to the strategic road network and good access to public transport. There are no overriding technical constraints to its development.
- 3.5 The site is not considered an area of landscape sensitivity, nor is it in an identified gap where development of the site could physically or visually be considered to result in landscape harm or coalescence. It is also a well contained site with strong defensible boundaries formed by a mixture of existing built form, including the A27 to the south-east, and strong planting.
- 3.6 In respect of Highways, it has been demonstrated that a suitable access can be provided to the site (see appendix 3). Vistry is committed to providing suitable pedestrian access to the site to provide a safe and convenient route for people to access the facilities and services in Wallington and Fareham. Formal details of pedestrian routes would be submitted with a planning application, but, the adjoining roads are in public ownership and no overriding constraints to their provision are envisaged.
- 3.7 In terms of traffic impacts of the development on the surrounding road network, and in particular Pinks Hill road, it has been demonstrated that no overriding issues arise. Pinks Hill and Military road, avoiding the site, are not adopted highways managed by the Highways



Authority (HCC) - they are though owned and managed by a public body, Fareham Borough Council, meaning ownership issues are not an overriding constraint. HCC, in its formal responses to extant planning applications in Wallington (P/19/0894/OA), has confirmed that with suitable works to Pinks Hill, the cumulative impacts of development in the area can be appropriately accommodated (Appendix 2). Indeed, upgrading the road to potentially adoptable standard offers an opportunity for FBC, as owners of the road, to potentially remove its liability for maintenance and management through offering it for adoption to the Highways Authority.

- 3.8 In regards noise from nearby uses and roads, we have also demonstrated that, with suitable mitigation in place, the site can form a suitable living environment for residents.
- 3.9 The site is also not within an Air Quality Management Area (AQMA) and the proposals are located and will be designed such that sustainable forms of travel, such as walking and cycling, will be prioritised to reduce CO<sub>2</sub> and NO<sub>2</sub> production.
- 3.10 Our previous submissions in relation to the regulation 18 consultation and supplement consultation are included at Appendix 1 and set out in more detail how the site is suitable, achievable and available when tested against the comments of the SEA and SHELAA. These comments largely remain relevant and demonstrate there are no overriding issues preventing the sites allocation and development.
- 3.11 The previous allocation of the site by FBC, and its designation in the 2019 SHELAA as a Suitable, achievable and available site proves that the site has no overriding constraints which would prevent its development. This includes matters relating to highways.
- 3.12 The site also consistently scores well in the most recent SEA. The site is considered in three different ways by the SEA, despite being promoted as a single residential site. Nonetheless, the site consistently scores positively whether appraised as a whole site or in parts.

ID	Fareham Town Centre & other brownfield sites	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	
1998	Land at Pinks Hill (south-east part)	++	+/-	+	+	++	+/-	+/-	-	0	0	+	
1352	Land at Pinks Hill, Wallington (north-west part)	++	+/-	+	+/-	+	+/-	+/-	-	0	0	-	
1998	Pinks Hill, Wallington					++	+/-	+	+/-	-	0	0	+

Figure 3 - Extract from the SEA (November 2020)

- 3.13 Overall, the submission version SEA confirms the site is suitable for development and should be selected.

1998	Pinks Hill, Wallington	Selected - suitable site, low landscape sensitivity
------	------------------------	---

Figure 4 - Extract from Appendix G of the SEA November 2020

- 3.14 The site also scores comparably, and in some instances better than sites chosen for allocation, including against sites not yet benefitting from planning permission or a resolution to grant.
- 3.15 The site's sustainability was confirmed by the SHELAA December 2019 which concluded that the site is suitable, available and achievable. However, the latest SHELAA (September 2020) confusingly then suggests the site is not suitable or achievable, despite its previous acceptability in the 2019 SHELAA, and its positive scoring in the latest SA.
- 3.16 Vistry welcomes the fact that the latest SHELAA now considers the site for a minimum of 130 units and no employment, which we have previously argued is a more appropriate and efficient use of the site and hence this change is supported.
- 3.17 Furthermore, the latest SA sets out an even more positive appraisal of the site.
- 3.18 Overall, the site offers an excellent opportunity to deliver at least 130 homes on a sustainable and accessible site. The sites suitability for development continues to be recognised by the evidence published supporting the plan, which ranks the site highly on the majority of SA objectives. Development of the site also continues to cohere with FBC's preferred plan strategy (option 2F). There are also no overriding technical constraints to the site's development. The site should therefore be reincluded for allocation in the plan to make an important and sustainable contribution to FBC's housing need. Failure to include the site in the plan to meet the increase in housing requirement would represent an unsound and unjustified approach to the consideration of sites for development which does not cohere with the requirement that plans be positively prepared to meet the areas housing need.

## 4.0 Other Policies

### Policy HP5 – Affordable housing

- 4.1 Vistry is committed to providing an appropriate quantum and mix of affordable housing on site to meet local needs.
- 4.2 Vistry supports the wording of part (iv) of policy HP5 which recognises that local need and site characteristics are key drivers of mix but suggest that Market Signals also be added to the considerations.

### Policy HP9 – Self and Custom Build Housing

- 4.3 Custom build and self-build development is an important part of the Government's agenda to widen the choice of homes and encourage greater variety by supporting small and medium size housebuilders. The need for self and custom build plots is recorded through registers kept by Councils and a duty has been placed on LPAs to grant planning permission to satisfy this need in full. As set out in our regulation 18 representation to the 2017 draft plan, it is considered that the policy is too blunt and fails to account for the particular needs and requirements of potential self and custom home builders. Self/custom building housing is a dynamic housing need that can vary considerably year-on-year and therefore a more dynamic policy is required that enables the requisite amount of self/custom building development land to come forward in places and on sites that reflects the actual need as identified by the local self-build register.
- 4.4 It is not clear whether the Council has considered alternative approaches to the delivery of self-build plots. It is important that the Council examines all options in line with PPG before placing additional burdens on the development industry. The PPG also sets out at para 025 of the Self build and custom build housebuilding page that the Council should seek to encourage landowners to consider the provision of self-build plots and facilitate access where they are interested. The approach taken by the Council clearly goes beyond encouragement as it requires the provision of plots without site specific prior engagement about what is realistic and achievable on a given site, taking account of its particular context and local circumstances.
- 4.5 It is also questionable whether there will be a high demand for self-build plots within a wider residential estate. In our experience, self-builders seek either bespoke 'self-build' sites (such as that proposed by application P/19/0130/OA – see below) or individual self-build units, often in the countryside. Provision as part of a larger scale site is hence likely to lead to poor take up of

the self-build plots and not meet the requirements of those on the register, whilst also resulting in additional cost and wasted developable space on sites such as Pinks Hill.

- 4.6 If the Council considers that a quota-based policy is the preferred approach to satisfying the self/custom build need in Fareham then a more flexible approach should be adopted. For example, the proportion of plots being brought forward as self-build should only reflect the need demonstrated on the register. This should also factor in locational choice as clearly demand exhibited in one part of the Borough is specific to that location and it would be unreasonable to expect those on the register to satisfy their need elsewhere. If a specific quota is applied, then this should be regarded as a starting point for negotiations and with the relevant caveat that such a requirement could be set aside or reduced on the grounds of viability or contextual factors relevant to the site.
- 4.7 Vistry Group do offer a 'self-finish' product whereby the developer works with the potential home buyer to design the interior layout, fixtures and fitting to provide a bespoke interior product for the purchaser, akin to custom build options. This offers an alternative, more appropriate, route for delivery of a self/custom build type product as part of a larger site, whilst still making the most efficient use of the site and the time and resources required.
- 4.8 In the case of Pinks Hill, an application for an entirely self-build scheme of 26 dwellings is under consideration adjacent to the site (FBC ref P/19/0130/OA). This would likely take the foreseeable demand within Wallington for Self-build plots on a site designed to cater specifically to the self and custom build market. If further plots were delivered on Pinks Hill, there is a very real risk that these plots could be left empty due to the saturation of self-build plots in the very immediate area. This is a good example of why draft Policy HP9 is too blunt and needs to be made more flexible and dynamic, responding to the actual demand for self-build plots as identified on the register.
- 4.9 Notwithstanding the above, if the quota-based approach is adopted, Vistry support the inclusion of the 'fall back' that any self-build plots that are not taken up can be developed as standard units as part of the wider site. It is suggested that this fall back be made more agile by reducing the period to six months to reduce potential expensive delays on site. Consideration should also be given to how any self-build plots would fit conveniently and safely within the wider development site as their inclusion introduces logistical and health and safety challenges not recognised by the policy or supporting text.

Policy NE2 – Biodiversity net Gain

- 4.10 Vistry is committed to protecting and enhancing ecology on the sites it delivers and welcomes efforts to utilise opportunities to improve biodiversity on sites. However, there appears to be inconsistent consideration of the potential affects of imposing a Biodiversity Net Gain (BNG) requirement on the deliverability and viability of sites, which could have implications for site delivery.
- 4.11 Firstly, in viability terms, we note that a £500 sum per dwelling has been assumed as the 'cost' of implementing BNG, based on figures provided by Natural England. However, the basis on which this 'average' figure has been arrived at by Natural England is not apparent from the published evidence base. The BNG cost is also likely to vary substantially depending on the baseline ecological value of a particular site and the ability to provide enhancements.
- 4.12 There also does not appear to have been an assessment of how the requirement to provide BNG might affect site capacity. Some habitats which may require enhancement are particularly land intensive and so may reduce the developable area of sites, which in turn may reduce site yields and viability.
- 4.13 A blanket £500 per dwelling assumption in testing the viability of the policy is therefore too blunt a measure of its affect on viability.
- 4.14 Finally, recognition, either within the policy or supporting text, should be given to the potential use of 'credits' to achieve BNG where net gains are not achievable on site.

Policy NE8 – Air Quality

- 4.15 Vistry is pleased that amendments have been made to this policy. However, whilst improved from its original wording, it still remains somewhat ambiguous, particularly the first paragraph of the policy which states that major development "shall...contribute to the improvement of local air quality". It should be made abundantly clear within the policy that this does not mean major developments need to demonstrate they are 'air quality neutral'. This still could have the unintended consequence that, where a development has even a slight negative change to air quality, it could be refused. To reiterate however, that alongside requirements for electric vehicle charging points should be measures to ensure security of supply and sufficient capacity from National Grid and local distribution networks, to support the promotion of, and increased reliance on, electric vehicles. Vistry nonetheless supports the overall principle of the policy and strongly endorses adopting measures to minimise harm to air quality in the area. This will include

imbedding measures in the design of the site that will encourage people to walk and cycle to local facilities and services, reducing the need to travel by car.



## 5.0 Conclusion

- 5.1 In conclusion, the Fareham Borough Council draft Local Plan 2037 in its current form is not sound for the reasons set out in this representation. The principal reason the plan is not considered sound and not positively prepared following the abandonment of the SMAHN published by the Government for consultation in August 2020. The Council should instead utilise the adopted methodology as set out by the PPG which indicates a local need of 514 units per annum.
- 5.2 A reconsideration of the housing numbers upwards to reflect the adopted housing method, the actual sub regional housing shortfall and the historic under delivery in the Borough resulting in affordability issues would allow FBC to plan positively for good growth to positively meet its housing needs. Owing to the significant changes to the Plan this necessitates we would urge the Council to undertake a further round of consultation on a revised plan reflective of housing needs as set out in the PPG. This approach will significantly reduce the risk of The Plan being found unsound at EiP.
- 5.3 The land at Pinks Hill represents a suitable, achievable and available site, ready for allocation in a revised plan to meet the Council's actual housing need. The site has historically been proposed for allocation, and even on the latest Council Evidence, the site is considered 'suitable' for development due to its sustainable location and in accordance with the Council's chosen strategy. The site can provide new housing supply early in the plan period, within the first 5 years of the plan, which will help mitigate any potential delays to the delivery of larger sites such as but not limited to Welborne. The site should therefore be reallocated for development to help meet the evidenced housing need in the Borough. Vistry look forward to working with the Council to bring forward the site development.

# 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)

Vistry Group

Address:

Cleeve Hall, Bishops Cleeve, Cheltenham

Postcode:

GL52 8GD

Telephone Number:

C/O agent

Email Address:

C/O agent

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

Title:

Mr

First Name:

Nick

Last Name:

Billington

Job Title: (where relevant)

Associate Director - Planning

Organisation: (where relevant)

WYG

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).

N/A - see report representation

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

N/A - see report representation

B1c Which part of the Policies Map?

N/A - see report representation

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

See accompanying report which provides details. In summary, the proposed housing strategy in the plan does not reflect the Government's adopted approach to calculating housing need and hence is unsound.

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?

See accompanying report for details. In summary, the plan should use the adopted method for calculating housing need as the starting point for calculating the housing required, whilst also considering fully the unmet need of neighbouring authorities. This will likely then require allocation of additional sites for development.

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

See accompanying report for details. The suggested modifications would mean the housing requirement is based on a adopted methodology and help make sure the Borough is meeting the housing needs of its current and future residents.

**B4c** Your suggested revised wording of any policy or text:

See accompanying report.

**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):

In order to fully explain and explore the complex nature of the housing strategy with the inspector and council as well as to allow a full and proper consideration of the process of reviewing and selecting sites for allocation.

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 Draft Local Plan 2036 Supplement Representations Pinks Hill**

**Prepared on behalf of Vistry Homes Limited  
February 2020**

## Document control

Document:	Fareham Draft Local Plan 2036 Supplement Representations	
Project:	Fareham Draft Local Plan 2036 Supplement Representations	
Client:	Vistry Homes Limited	
Job Number:	HP16040-A097690	
File Origin:	N/A	
Revision:	V1 For client review	
Date:	23 February 2020	
Prepared by SH	Checked by N/A	Approved by N/A
Revision:	Final	
Date:	28 February 2020	
Prepared by SH	Checked by CL	Approved by CL

## **Contents**

1.0 Introduction

2.0 Local Plan 2036 Supplement

3.0 Interim Sustainability Appraisal

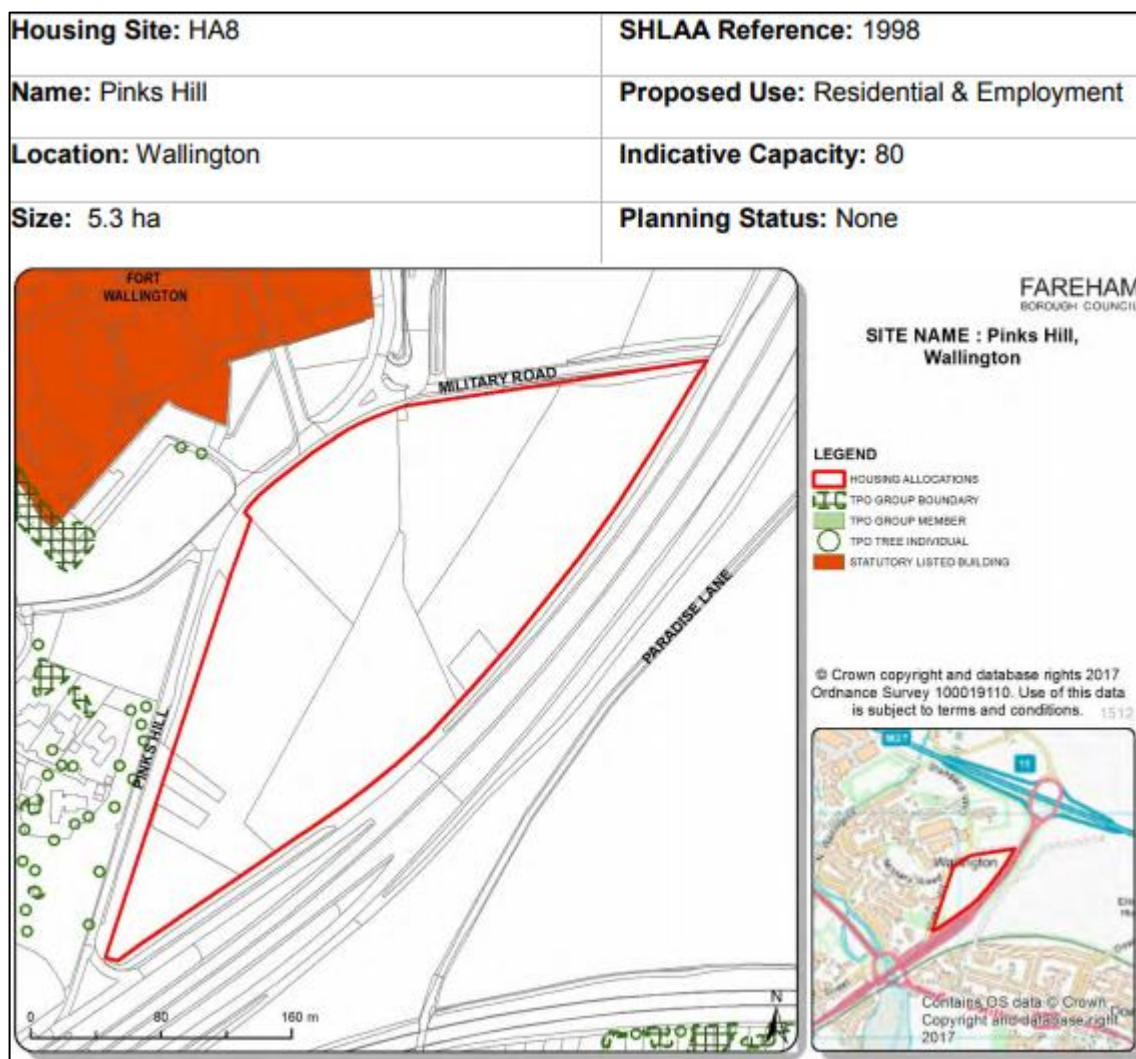
4.0 Strategic Housing and Employment Land Availability Assessment

5.0 Interim Draft Infrastructure Delivery Plan

6.0 Conclusion

## 1.0 Introduction

- 1.1 These representations have been prepared by WYG on behalf of Vistry Homes Limited who control land at Pinks Hill, Fareham. Vistry Group was formed on 3 January 2020 following Bovis' Homes acquisition of Linden Homes and the Partnerships and Regeneration businesses of Galliford Ty plc. The representations relate to Fareham Borough Council's Draft Local Plan 2036 Supplement and supporting evidence documents, comprising the following:
- Interim Sustainability Appraisal
  - Strategic Housing and Employment Land Availability Assessment
  - Infrastructure Delivery Plan
  - Interim Transport Modelling Outputs
  - Employment Study
  - Viability Study
- 1.2 It is acknowledged that the consultation does not include the Draft Fareham Local Plan, published in 2017 and therefore, these representations do not provide detailed comments in respect of the draft plan. The site has previously been promoted as part of the Council's Call for Sites and Draft Local Plan Regulation 18 consultation, and these previous representations remain valid.
- 1.3 Vistry Homes control a parcel of land to the east of Pinks Hill and south of Military Road, Wallington. The site extends to approximately 5.3 hectares and is allocated for residential development, with an indicative capacity of 80 dwellings, in the Fareham Borough Draft Local Plan (2017) under Policy HA8. An extract from the Policy is copied below to show the site location:



**Figure 1 Extract from Fareham Draft Local Plan (2017)**

- 1.4 These representations consider the Local Plan Supplement and the supporting evidence base, which are the subject of a Regulation 18 Consultation which runs from 13 January to 1 March 2020. The representations address each document in turn, insofar as they relate to Vistry Homes' interest in land at Pinks Hill.

## 2.0 Local Plan 2036 Supplement

2.1 The Supplement has been produced in response to the Summer 2019 Issues and Options consultation and is intended as a supplement to, rather than a replacement of, the Draft Local Plan (2017). The Supplement sets out:

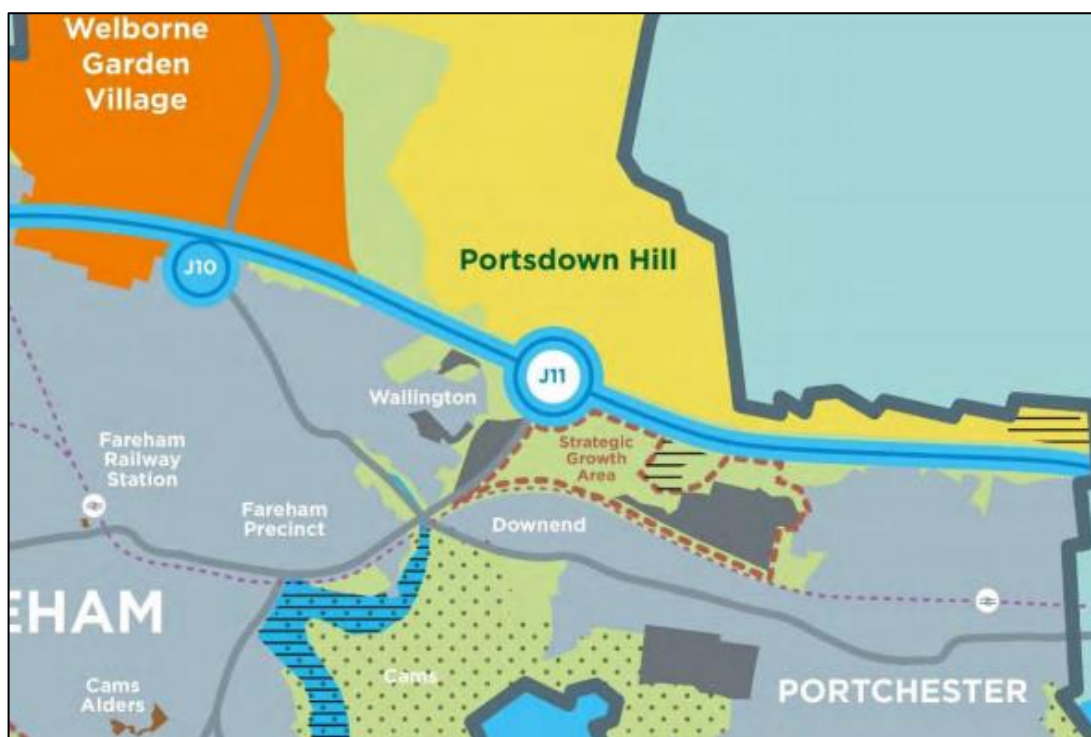
1. Detail of the revised development strategy
2. Further proposed development allocations
3. Additional policies to ensure compliance with NPPF

### The Revised Development Strategy

2.2 The revised development strategy introduces, amongst other things, valued landscape designations, revised strategic gaps and two strategic growth areas, with the overarching aim of providing, “sufficient suitable, available and achievable sites in order to meet the housing need”.

2.3 Vistry Homes welcome the fact that the Revised Development Strategy continues to support the development of land at Pinks Hill under draft allocation HA8. The Revised Development Strategy showing the site as a 2017 allocation on Figure 2.1 of the Local Plan Supplement, as shown in Figure 2 below and this is supported. The site is sustainably located close to the existing urban area boundary and the proposed Strategic Growth Area North of Downend.





**Figure 2 Extract from Fareham Local Plan 2036 Supplement**

- 2.4 The Local Plan Supplement confirms that the Borough's housing need, based on the standard methodology, will be fixed at the point of submitting the Local Plan for Examination and will include a buffer of 10 – 15% to allow for unforeseen delays in the delivery of Welbourne. Vistry Homes support the recognition that the delivery of Welbourne has the potential to be delayed and as such, there is a need to ensure the Local Plan includes smaller, less constrained sites which can be delivered within the early part of the plan period to meet housing need.
- 2.5 It is the intention that following consultation, the Draft Local Plan and Local Plan Supplement will be combined to form a single Local Plan Document. Vistry Homes continue to support Policy HA8 (Pinks Hill) identified in the Draft Local Plan (2017) and confirmed in the Local Plan 2036 Supplement and welcome the intention of the Council to allocate the site in the Regulation 19 version of the Local Plan.
- 2.6 Policy HA8 sets out a list of development requirement criteria. Linden Homes (now part of Vistry Group) has previously commented on these criteria in their Draft Local Plan 2036 representations dated December 2017, and these comments remain valid.
- 2.7 In particular, Vistry Homes would like to re-iterate the fact that, as proposed, the provision of 80 dwellings over the net developable area (3.5 hectares) would equate to a development

density of just 23 dwellings per hectare, which is universally accepted as a low density. Comparable densities from similar planning applications elsewhere in the Borough would result in the delivery of 130 dwellings, rising to 150 dwellings without the employment area. If applied too rigidly, a figure of 80 dwellings would not represent an efficient use of land and therefore, should be provided as a minimum requirement.

- 2.8 The Draft Development Framework at Appendix F of the Draft Local Plan also shows an area for employment on the northern part of the site. For the reasons set out in Linden Homes (now part of Vistry Group) previous representations (December 2017), this is not considered necessary and should be removed. Noise modelling has been carried out and it has been demonstrated that this “employment buffer” is not required to secure acceptable living conditions for future residents. In addition, the limited contribution to be derived from the employment element, given its small scale, localised nature directly adjacent to existing, employment hubs, could be more appropriately sited elsewhere. Further consideration is provided in Section 5 of these representations.
- 2.9 While Appendix F of the Draft Local Plan 2036 continues to provide appropriate parameters for the development of the site, as set out in our previous representations in December 2017 and elsewhere in these representations, it does not provide an accurate representation of the site’s development potential. The framework should be updated to reflect a higher density and the removal of employment units, based on the layout illustrated below. This illustrative layout also allows the findings from more recent technical assessments, such as noise, to be incorporated.



**Figure 3 Illustrative Layout: Land at Pinks Hill**

#### Further Proposed Development Allocations

- 2.10 Vistry Homes have no comments to make on these allocations but support the fact that these are in addition to, rather than in place of, existing allocations identified in the Draft Local Plan (2017), including Policy HA8.

#### Additional policies to ensure compliance with NPPF

- 2.11 The following comments and objections are made in respect of the new Air Quality Policy introduced through the Local Plan Supplement, currently referenced by the prefix NEXX.

Comment: Proposals are for developments to be 'air quality neutral' which is a policy currently exclusive to London. While this means that developments do not generate more emissions than is appropriate for the scale of the development and therefore shouldn't significantly affect development viability, if it does result in more air quality mitigation measures being required, these impacts should continue to be assessed alongside other policy requirements.

Support: Vistry Homes support the requirement to future proof developments so they can be retrofitted with EV charge points, rather than requiring installation at the time of development. However, alongside this requirement should be measures to ensure security of supply and sufficient capacity from National Grid and local distribution networks, to support the promotion of and increased reliance on electric vehicles.

Object: There is scope for any development which causes even a slight negative change in within AQMAs or Clean Air Zones to be refused based on bullet point a) of the policy. The requirement for mitigation to offset any effect is left open-ended and would benefit from further clarification.

### 3.0 Interim Sustainability Appraisal

3.1 The Interim Sustainability Report (January 2020) includes a Site Options Assessment, which provides an appraisal of borough-wide sites which have been assessed as being suitable for development and are being considered for allocation. This includes sites identified in the Draft Local Plan (2017).

3.2 Allocation HA8 is assessed under Site ID 1998 Pinks Hill, Wallington, as shown in Figure 3 below:

<b>ID:</b> 1998		<b>Name:</b> Pinks Hill, Wallington								
<b>Proposal:</b>		5.33 ha greenfield site outside USB proposed for residential and employment use								
<b>SA1</b>	<b>SA2</b>	<b>SA3</b>	<b>SA4</b>	<b>SA5</b>	<b>SA6</b>	<b>SA7</b>	<b>SA8</b>	<b>SA9</b>	<b>SA10</b>	<b>SA11</b>
++	+/-	+	+/-	+	-	+/-	-	0	0	+
<b>SA Commentary</b>										
<b>1</b>	Indicative yield: 80 dwellings									
<b>2</b>	One Listed Building, two Historic Unlisted Buildings within 200m; two HCC Archaeology Alert Green on site									
<b>3</b>	100.0% C Portsdown LCA – High development potential									
<b>4</b>	Falls within 6 accessibility zones									
<b>5</b>	Falls within 6 accessibility zones; not within Flood Zone or Coastal Change Management Area									
<b>6</b>	54.5% SPZ 1 : 85.1% SPZ 2 : 85.1% SPZ 3									
<b>7</b>	Three internationally important features within 1,000m (Portsmouth Harbour Ramsar/SPA 289.9m S; Solent & Dorset Coast pSPA 237.9m SW) One nationally important feature within 500m (Portsmouth Harbour SSSI 289.9m S) No locally important features on site									
<b>8</b>	82.9% ALC Grade 2, 17.1% ALC Urban; Minerals Safeguarded Sites; Minerals Deposits									
<b>9</b>	No employment floorspace proposed									
<b>10</b>	Unlikely to compete with existing or proposed centres									
<b>11</b>	Within 300m of 2 existing open spaces									

**Figure 4 Extract from Site Options Appraisal (January 2020)**

3.3 The methodology used to assess the sites is welcomed, particularly as it provides consistency through a quantitative assessment applied to all sites. However, this provides an entirely factual assessment. In the absence of any commentary or recommendations, there is a risk that the site selection process is over-simplified and is based on the "score" for each site.

- 3.4 Notwithstanding this, the assessment of Site 1998 is largely positive, with only one objective (natural resources) being assessed as having likely strong adverse effects due to the potential effects on agricultural land and minerals, which is common to the majority of greenfield sites. The ability to provide a significant number of dwellings (80) on a site assessed as having high development potential due to minimal impact on the landscape character, is supported by the positive assessments in relation to objectives SA1 and SA3. Uncertain/mixed effects are noted but can be addressed as proposals progress and further surveys and technical work is carried out to inform the proposals.
- 3.5 SA objective 9 confirms that no employment space is proposed and is therefore assessed as neutral. For the reasons set out above, Vistry Homes support the assertion that the site will not provide any employment and the fact that employment provision is not required in order for the site to be assessed favourably overall.



## 4.0 Strategic Housing and Employment Land Availability Assessment (SHELAA) December 2019

- 4.1 The SHELAA considers site reference 1998 (Pinks Hill, Wallington) to be suitable, available and achievable and therefore concludes that the site is a developable housing site. Vistry Homes support this conclusion of the site's development potential.
- 4.2 The SHELAA provides an estimated yield of 80 dwellings on a site area of 5.33 hectares. For the reasons set out in Section 2 of these representations, it is considered that this is too low and that the site capacity should be increased to a minimum of 130.
- 4.3 The following responses are provided in respect of other constraints and comments made in the SHELAA (2019):

Constraint: Public Right of Way

Response: There is a PROW to the east of the A27, but none are considered to affect the site and therefore, this should be removed as a constraint.

Constraint: Minerals

Response: Any future planning application would be subject to consultation with Hampshire County Council to ascertain whether or not prior extraction is appropriate or viable. Any loss of mineral deposits can be controlled through this process.

Comment: Noise and Air Quality Assessments

Response: Both would be provided as part of a future planning application. The conclusion of noise modelling carried out to date is that the site can accommodate residential development, with acceptable internal and external noise environments across the entire site during the day and night time periods, subject to the inclusion of modest noise mitigation to the site boundaries and through the careful orientation of buildings, rear garden areas and site layout.

Comment: The ability of Pinks Hill to serve the development needs to be fully assessed, including an adequate site access and the provision of a pedestrian/cycle footway. Land

ownership would appear to allow improvements to Pinks Hill and its junction with the A27 slip road to take place. A full Transport Assessment would be required for the site.

Response: These comments are noted and will be considered as part of a Transport Assessment to support any future planning application. Vistry Homes are aware that on-going discussions between Fareham Borough Council (as the owner of Pinks Hill and Military Road), Hampshire County Council and agents acting on behalf of development interests in the local area, have concluded that the widening of Pinks Hill is acceptable in principle and should not act as a constraint to the development in the vicinity.

## 5.0 Employment

- 5.1 The Business Needs, Site Assessment and Employment Land Study (January 2019), published as part of the current consultation, identifies part of the site at Pinks Hill for employment purposes under Site ID 1352 - Land at Pinks Hill.
- 5.2 The site extends to 0.7 hectares and is considered suitable for B2 or B8 open storage. The assessment does however note a number of constraints, including the requirement for measures to be put in place to limit additional commercial vehicle activity on Pinks Hill. The conflict with land being promoted for residential development directly adjacent, is also noted and Vistry Homes support the conclusion that, “adjoining land to the east, south and west is being promoted for residential development therefore employment uses on this site would not be compatible with adjoining residential (development)”.
- 5.3 The site scores negatively when assessed against the Market Attractiveness Criteria, with no evidence to show interest in the site. The recommendation is that the site is average (Score C) and independent of necessary highway infrastructure improvements and neighbouring residential development, would be considered suitable for commercial development. However, Vistry Homes consider that the conclusions regarding limited market attractiveness, conflict with future residential development and highway constraints, means that the site is far better suited to residential development as part of Allocation HA8.

## **6.0 INTERIM DRAFT INFRASTRUCTURE DELIVERY PLAN**

- 6.1 Vistry Homes support the fact that Pinks Hill, Wallington is listed at Table 5 as an allocation tested through the IDP; as one of the sites and locations infrastructure providers were asked to consider requirements and mitigation for. Vistry Homes are committed to working with infrastructure providers to ascertain the specific requirements in relation to their site at Pinks Hill. In this regard, Vistry Homes support the intention for the IDP to be a “Live Document” which will be updated as part of the ongoing local plan process and following discussions with infrastructure providers.
- 6.2 The intention to provide the specific infrastructure requirements of each of the proposed allocations, during the spring/summer 2020 and submitted as part of the evidence base to the Publication version of the plan, is welcomed. This will help provide certainty for developers and ensure that any on-site infrastructure requirements can be designed into a proposal at the earliest opportunity. Likewise, increased certainty regarding financial contributions would be welcomed. Concerns would be raised if the nature of a “Live Document” undermines this certainty and the ability to identify infrastructure requirements and contributions at an early stage of the development process.

## 7.0 CONCLUSION

- 7.1 In conclusion, Vistry Homes are supportive of the Council's intention to retain Housing allocation HA8 alongside new proposals and policies introduced through the Local Plan Supplement. Previous representations made in respect of the Draft Local Plan (2017) remain valid, particularly in respect of the site-specific criteria set out in Policy HA8.
- 7.2 Vistry Homes continue to support the assertion that the site should be allocated solely for residential purposes, the site assessment, published in the Employment Study as part of this consultation, demonstrates that the site has no market attractiveness and would conflict with adjoining residential proposals. On this basis, it is considered that the Development Framework at Appendix F of the Draft Local Plan should be amended and the employment provision removed.



## **Linden Homes (South)**

## **Land at Pinks Hill, Wallington**

## **Representations on Draft Fareham Local Plan 2036**

**December 2017**



## Document control

Document:	Representations on Draft Fareham Local Plan 2036	
Project:	Land at Pinks Hill, Wallington	
Client:	Linden Homes (South)	
Job Number:	HP15092	

Revision:	First Draft	
Date:	6 <sup>th</sup> December 2017	
Prepared by: Jacob Goodenough	Checked by: Trevor Moody	

Revision:	Client Draft	
Date:	8 <sup>th</sup> December 2017	
Prepared by: Jacob Goodenough	Checked by: Trevor Moody	

Revision:	Final	
Date:	8 <sup>th</sup> December 2017	
Prepared by: Jacob Goodenough	Checked by: Trevor Moody	



## **Contents**

- 1.0 Introduction
- 2.0 Policy DA1: Development Allocations
- 3.0 Policy H2: Provision of Affordable Housing
- 4.0 Policy H4: Adaptable and Accessible Housing
- 5.0 Policy H7: Self and Custom Build Homes

## **Appendices**

- Appendix 1 Noise Modelling



## **1.0 Introduction**

- 1.1 This representation has been prepared by WYG on behalf of Linden Homes (South) who control land at Pinks Hill, Wallington (draft allocation HA8) and focus on those parts of the draft Local Plan that are of particular relevance to our client's interests in that regard.
- 1.2 Linden Homes welcome the inclusion of land at Pinks Hill in the draft Local Plan, and support the principle of the allocation but wish to raise a number of concerns about the details of the allocation.

## 2.0 Policy DA1: Development Allocations

- 2.1 Policy DA1 allocates Land at Pinks Hill, Wallington for mixed use (residential and employment) development with an indicative capacity of 80 dwellings and small scale employment units up to 1,000sq.m in total.
- 2.2 Linden Homes support the principle of the allocation but wish to raise a number of concerns about the details of the allocation as set out further below.

### Contribution towards Housing Supply

- 2.3 Government policy in the form of the National Planning Policy Framework requires local planning authorities to *'boost significantly the supply of housing'* (paragraph 47, NPPF). National Planning Policy Guidance also advises that local planning authorities *'should aim to deal with any under-supply within the first 5 years of the plan period where possible'* (paragraph 035 Reference ID: 3-035-20140306, NPPG).
- 2.4 The commitment to boost housing supply has recently been reinforced as part of the Government's Budget announcement in November 2017 where the Chancellor of the Exchequer confirmed that housebuilding is the *"number one priority"* in the Budget and set a target of delivering 300,000 homes per year.
- 2.5 In line with national policy, Linden Homes' site at Pinks Hill can deliver a material amount of housing in the short term and with capacity to accommodate more housing than currently identified by Policy HA8. Work is underway to inform a planning application with the intention to make a formal submission to FBC in 2018 and the current assessments indicate that there are no site constraints that would prevent it being delivered quickly. It is anticipated that the site could begin delivery in the year 2019/20 for completion by the year 2022/23
- 2.9 The site can therefore deliver housing within the next five years to address the past under-supply in a timely manner in accordance with Government policy.

## Site Allocation HA8

### Site Allocation Plan

- 2.10 The red line delineating the allocation on page 151 measures 5.3 hectares and includes land under the control of Linden Homes and Fareham Borough Council. An indicative masterplan framework is included at Appendix F of the Local Plan (page 230) illustrating how the site could notionally be developed. This shows approximately 0.5 hectares given over to employment with the remaining 4.8 hectares given over to residential use and landscaping. The illustrative masterplan shows a net developable area of approximately 3.5 hectares (excluding the areas of public open space, play space and landscaping).

### Allocation Requirements

- 2.11 Requirement (a) sets out that *'the quantum of housing proposed shall be broadly consistent with the indicative site capacity'*. Linden Homes welcome the flexibility included in the policy, allowing broad consistency with the indicative site capacity, however the proposed provision of 80 dwellings over the net developable area (3.5 hectares) would equate to a development density of just 23 dwellings per hectare, which is universally accepted as a low density. If applied too rigidly, this would not represent an efficient use of land. Local Plans should be a positive exercise in planning for the future needs of an area and for this reason, it is important that no ceiling or other barriers are placed on housing delivery. Accordingly, if the Council is minded to maintain this indicative capacity it should be regarded as a minimum for the site.
- 2.12 The Draft Local Plan establishes an indicative housing mix at paragraph 5.25, which includes 99% of dwellings to be provided as 3-bedrooms or less. It is considered that the proposed density for Pinks Hill is unrealistically low for the type of development required in the Borough and a more appropriate density should be applied. Over the same developable area, a development density of 3.75dph would equate to provision of approximately 130 dwellings which is considered to represent a more efficient use of the land to help to significantly boost the supply of housing in accordance with National Planning Policy.
- 2.13 It is noted that the draft development frameworks prepared for other sites in the Borough have included density assumptions that offer greater flexibility. For example, Appendix C relating to the land at Greenaway Lane, Warsash identifies a variable density of between 15dph and 35dph for the site. Whilst the wording of Policy HA8 allows broad consistency with the indicative site capacity, the starting point for the allocation is too low if it is applied too rigidly. Accordingly, the indicative

capacity for the site should be increased to a more reasonable level so as not to artificially constrain its development potential. Further consideration of what Linden Homes consider to be a reasonable capacity for the site is set out further below having regard to the other requirements of the draft allocation.

- 2.14 Requirement (c) seeks to limit development to a maximum of 3 storeys on site, except for buildings fronting onto Pinks Hill and Military Road where building heights will be limited to a maximum of 2 storeys. Linden Homes are broadly supportive of this approach however, the current wording of the policy is too restrictive and it is considered that greater flexibility could be built into the policy in order not to curtail the development opportunities of the site. In this regard, the policy should be amended to read: *The height of buildings shall be generally limited to a maximum of 3 storeys, except for buildings which front onto Pinks Hill and Military Road where building heights will be generally limited to a maximum of 2 storeys;*
- 2.15 Requirement (d) sets out that the development of Pinks Hill shall make '*provision of safe pedestrian and cycle crossing points across Pinks Hill and along Military Road to provide the site with links to both Wallington and the surrounding area, in order to link the site with local schools and existing services*'. Linden Homes do not dispute the requirement to deliver these connections however the policy should be less prescriptive and more flexible in how these connections are delivered. In this regard, it is considered that requirement (d) of draft allocation HA8 should be amended to read '*the provision of safe pedestrian and cycle links to Wallington and the surrounding area, in order to link the site with local schools and existing services*'. This is considered to provide greater flexibility on how the site could be delivered.
- 2.16 Requirement (f) identifies a need for the '*provision of a suitable and robust visual and acoustic buffer between the site and the waste transfer station logistics depot immediately north of the site (as illustratively shown in Appendix F). Active uses within the buffer such as the provision of small scale employment units (up to 1000 sq.m in total) will be supported provided they:*
- *are screened by tree belts; and*
  - *are served by a separate access road from Military Road; and*
  - *provide an effective visual and acoustic barrier from traffic movements.*
- 2.17 WYG on behalf of Linden Homes were instructed to undertake further work to understand the noise environment of the site. This work included baseline assessments to determine background levels from neighbouring noise sources, including the A27, M27 and existing industrial development within



the vicinity of the Pinks Hill Site (including the waste transfer station to the north). Existing ambient noise levels around the site were recorded as being dominated by road traffic noise from the A27, the M27, and Wallington Way.

- 2.18 The purpose of this noise modelling work was to ascertain the level of mitigation required and to inform the design and layout of potential future residential development. The modelled illustrative concept layout is attached at Appendix A. This background modelling formed part of the site promotion submitted to FBC ahead of the publication of the draft Local Plan and this is included at Appendix B of this representation. The conclusion of the noise modelling is that the site can accommodate residential development, with acceptable internal and external noise environments across the entire site during the day and night time periods, subject to the inclusion of modest noise mitigation to the site boundaries and through the careful orientation of buildings, rear garden areas and site layout.
- 2.19 Based upon this noise modelling it is considered that draft policy requirement (f) is not necessary in order to secure an appropriate living environment for future occupiers of the site. Accordingly, the entire site could come forward for residential development, with ample opportunities to provide a visual or landscaped buffer to the industrial land uses to the north. In addition, the proposed employment element of the draft allocation would only make limited contribution to employment provision within the Borough and could be readily provided elsewhere within the Borough, either in existing employment allocations and industrial estates or in more appropriate green or brownfield locations. Based upon the density calculations set out above, assuming the employment land is given over to residential use, then it is estimated that the site could in fact accommodate up to 150 dwellings.

#### **Appendix F: Development Allocation HA8 (Pinks Hill, Wallington) – Illustrative Framework**

- 2.20 With the exception of the proposed employment element of the draft allocation, which we contend is not necessary to provide a buffer to the waste transfer station to the north, Linden Homes are broadly content with the parameters established by the Illustrative Framework. However, it is considered that the Development Framework adds little to the draft site allocation and should be removed. If the framework plan is to remain part of the Development Plan it should only be regarded as illustrative and should not be used to direct the development of the site, particularly if the detailed technical and environmental assessments accompanying a future planning application confirm that a better alternative approach exists.

## Summary

- 2.21 In summary Linden Homes support the principle of allocation HA8 but wish to raise a number of concerns about the details of the allocation. In particular the capacity of the site assumed by Fareham Borough Council is artificially low and does not make best use of the site. It is also considered that the employment element of the application is superfluous because noise modelling demonstrates that an acceptable living environment for residential users can be created without it. Therefore, it is considered that the site has a greater capacity than indicated by the draft Local Plan and it is suggested that the indicative capacity of the site be upwardly revised to 150 dwellings, with the wording of requirement (a) maintained to provide flexibility. Without prejudice to our case above, if the Council are minded to retain the employment element of the site allocation then the indicative capacity should be upwardly revised to 130 dwellings. In addition to this amendment and as set out above, greater flexibility should be incorporated throughout the draft allocation to make sure that no artificial constraints are placed on the site. This will ensure the development can respond appropriately to the development needs of the Borough and the opportunities and constraints of the site, informed by the requisite technical and environmental assessments.

### **3.0 Policy H2: Provision of Affordable Housing**

- 3.1 Paragraph 173 of the National Planning Policy Framework (NPPF) sets out that plans should not set out obligations that would threaten the viability of the sites and scale of development that is being proposed in the plan.
- 3.2 Policy H2 is aligned with national policy as set out within the written ministerial statement of 28<sup>th</sup> November 2014 and paragraph 31 of Planning Practice Guidance (ref: 23b-031-20161116), in that affordable housing are only sought on development of 11 units or more. The justification behind the national policy is clear, it seeks to ease the disproportionate burden of developer contributions on small scale developers, thereby encouraging more small and medium scale house builders to improve competition and variety. The acknowledgement of this national policy requirement in policy H2 is supported by Linden Homes.
- 3.3 In addition, the requirement for 30% affordable housing provision as set out within Policy H2 is well evidenced by the Local Plan Viability Assessment which is considered robust. The acknowledgement of viability within policy H2 is welcomed and enables the policy to be operated with a suitable degree of flexibility where the need for that is robustly justified.
- 3.4 However, policy requirement a) which necessitates the provision of 10% of the overall dwellings on site as affordable home ownership products is somewhat ambiguous. The supporting text to the policy at paragraph 5.19 seems to suggest that this 10% provision is for starter homes and it is not clear from the current wording of the policy how this requirement affects the provision of other more traditional affordable tenures including shared ownership. Paragraph 5.18 identifies a notional 65:35 affordable rent to affordable home ownership products which identified through the PUSH SHMA, but which appears to exclude starter home provision. Linden Homes supports the inclusion of starter homes within the definition of affordable housing under Policy H2 but requires greater clarity on the split of tenures sought by the Policy.
- 3.5 Policy H2 is consistent with national policy, it is well evidenced and provides a suitable degree of flexibility and it is therefore considered generally sound, subject to greater clarity on the housing tenure requirements.

## **4.0 Policy H4: Adaptable and Accessible Housing**

- 4.1 The requirements of Policy H4 appear to be reasonable, however Linden Homes agree with paragraph 5.39 that the viability implications of the category 3 optional standard for wheelchair accessible homes should be fully tested in advance of the plan being adopted. This is because the cost implications of this standard may have implications on the viability of development proposals and therefore the ability to deliver necessary affordable homes and infrastructure requirements. In order to provide flexibility, a balance between scheme viability, affordable housing and infrastructure delivery is considered necessary. Accordingly, it is suggested that this policy should be amended such that its requirements could be set aside or reduced on the grounds of viability.

## 5.0 Policy H7: Self and Custom Build Homes

- 5.1 Custom build and self-build development is an important part of the Governments agenda to widen the choice of homes and encourage greater variety by supporting small and medium size housebuilders. The need for self and custom build plots is recorded through registers kept by Councils and a duty has been placed on LPAs to grant planning permission to satisfy this need in full. The need identified on FBC's register does not appear to have been factored into the Objectively Assessed Housing Need (OAHN) reported in the GL Hearn April 2016 update report. Whilst there may be some overlap between the need identified on the register and the OAHN, based upon the evidence provided in support of the draft local plan, and for the avoidance of doubt, the assumption should be that the need for self/custom build is distinct from the OAHN as a specialist form of housing.
- 5.2 On this basis, policy H7 is therefore flawed. By requiring 5% of plots to be provided on all sites over 100 units as self/custom build this may have the implication of diminishing the contribution of such sites towards satisfying the full OAHN. There is also the risk that policy H7 could leave a significant number of self-build plots empty if the demand for such develop does not exist or if those on the register do not have the ability to build their own homes. There is currently no mechanism in the policy for these plots to revert to the developer and as such the policy is ineffective. We are also concerned about how the plots would be delivered on large housing developments in a way that conforms sufficiently with site health and safety requirements.
- 5.3 The report prepared by Adams Hendry in January 2017 considering self and custom build housing need in Fareham identifies a need for 20 plots at a specific point in time. However, this is demonstrably out of date with Fareham Borough Council's self-build register currently identifying a total need for 97 plots. The evidence base supporting the local plan is therefore out-of-date and does not accurately reflect the total need for self/custom building housing land.
- 5.4 The requirements of Policy H7 are therefore arbitrary, and are not properly evidenced. It is considered that the policy is too blunt and may negatively impact the ability of Fareham Borough Council to meet its objectively assessed needs. Paragraph 14 of the National Planning Policy Framework (NPPF) requires Local Plans to be flexible and able to adapt to rapid change. Self/custom building housing is a dynamic housing need that can vary considerably year-on-year and therefore a more dynamic policy is required that enables the requisite amount of self/custom

building development land to come forward without prejudicing the Council's ability to meeting its OAHN.

- 5.5 It is not clear whether the Council have considered alternative approaches to the delivery of self-build plots. It is important that the Council examines all options in line with PPG before placing additional burdens on the development industry, which may have the unintended consequence of prejudicing the Council's ability to meet its full OAHN. The PPG also sets out in paragraph 57-025 that the Council should seek to encourage landowners to consider the provision of self-build plots and facilitate access where they are interested. The approach taken by the Council clearly goes beyond encouragement as it requires the provision of plots.
- 5.6 If the Council consider that a quota based policy is the preferred approach to satisfying the self/custom build need in Fareham, and provided that it can be demonstrated that this would not affect the Council's ability to satisfy its OAHN in full, then a more flexible approach should be adopted. For example, the proportion of plots being brought forward as self-build should only reflect the need demonstrated on the register. This should also factor in locational choice as clearly demand exhibited in one part of the Borough is specific to that location and it would be unreasonable to expect those on the register to satisfy their need elsewhere. If a specific quota is applied then this should be regarded as a starting point for negotiations and with the relevant caveat that such a requirement could be set aside or reduced on the grounds of viability.
- 5.7 In the case of Pinks Hill, local demand for self build development is likely to be absorbed by the site immediately adjacent (policy HA16), which is proposed to be allocated for an entirely self-build scheme of up to 26 dwellings. However, based on the current requirements of Policy H7, the revised allocation for Pinks Hill discussed at Section 2 above would be required to provide 5% self-build properties, which may result in provision of circa 33 self-build plots in the Wallington area. There is a very real risk that these plots could be left empty if the demand for such develop does not exist. This is a good example of why draft Policy H7 is too blunt and needs to be made more flexible and dynamic, responding to the actual demand for self-build plots as identified on the register.





## **Appendix A – Conceptual Layout (Illustrative)**



## **Appendix B - Noise Modelling**

Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
PO16 7AZ

*Economy, Transport and Environment Department  
Elizabeth II Court West, The Castle  
Winchester, Hampshire SO23 8UD*

Tel: 0300 555 1375 (General Enquiries)  
0300 555 1388 (Roads and Transport)  
0300 555 1389 (Recycling Waste & Planning)  
Textphone 0300 555 1390  
Fax 01962 847055  
[www.hants.gov.uk](http://www.hants.gov.uk)

Enquiries To **Matt Lewis**



Date **17 September 2020**

My reference **029273**

Your  
reference **P/19/0894/OA**



Dear Mr Wright,

### **Land East Of North Wallington**

#### **Fareham Outline planning application with all matters reserved (except for access) for residential development of up to 29 dwellings, associated landscaping and access off North Wallington Road**

These comments are in response to the additional plans submitted under planning application P/19/0894/OA. The plans relate to footway improvements along North Wallington to better the pedestrian access to the site and links to sustainable transport.

The proposed concept of introducing a formal shuttle system is reasonable. It should be noted that the existing on-street parking results in a form of informal shuttle system, however there are gaps where vehicles can pull in to give way. The proposed shuttle system would result in a significant stretch of 75m of single file traffic. This length should be reduced.

In addition to the above, the formal shuttle system would remove some level of parking provision along North Wallington. The quantum of spaces available (and thus to be removed) has not been evaluated, and no indication of where the displaced parking will move to has been assessed. This assessment should be provided.

For vehicles travelling east, the design may result in increased speeds due the new regulated priority system. It is request that an RSA 1 is conducted to assess this and any other potential safety concerns with the proposals.

*Director of Economy, Transport and Environment  
Stuart Jarvis BSc DipTP FCIHT MRTPI*

Due to the road narrowing and introduction of kerb lines, vehicles may strike or mount the kerb causing maintenance issues and posing concern regarding pedestrian safety. As above, a RSA1 would highlight this if a concern.

It is noted that there are significant trees in the area and close to the indicative works. The embankments and proximity of the waterway will also have an impact to the costs and deliverability of the works. Further information would be required to assure the Highway Authority that the works are both deliverable and financially viable for the site.

No assessment of street lighting has been undertaken for the new footpath and should be provided

In line with tangent discussion with other sites in the Wallington area, this site will have an impact on Pinks Hill. Pinks Hill is not adopted public highway and is therefore not controlled or maintained by HCC as HA. As such, the highway authority, whilst not objecting directly, recommended the improvement works to Pinks Hill set out in applications P/20/0636/OA and P/19/0169/OA are secured to make the development acceptable. This is to ensure the proposed development does not have a detrimental impact on public safety regardless of the status of the road.

A cumulative impact leading to unacceptable harm has been identified on Pinks Hill from the current applications and emerging local plan allocations in the Wallington area. It is recommended that, to mitigate this impact, a contribution should be taken to provide the Pinks Hill improvements from developments in the Wallington area forecast to increase traffic via Pinks Hill; this contribution should be split proportionally between the developments. A contribution should be paid prior to commencement of each development site.

Pinks Hill is not adopted highway and is owned and maintained by FBC; as such, securing of improvement works and arrangements for their construction will be the responsibility of FBC. A modest level of residential occupations may be considered acceptable prior to construction of the required improvement works; further evidence could be submitted to support this. Should this evidence not be provided, or not be considered appropriate to justify a level of increased traffic, then it is the HA's recommendation that the Pinks Hill improvement works should be completed prior to occupation of any significant development in the Wallington Area, including this site.

Yours sincerely,

Matt Lewis  
Assistant Transport Planner

*Director of Economy, Transport and Environment*  
**Stuart Jarvis BSc DipTP FCIHT MRTPI**

---

**Respondent details:**

Title:	Mr
First Name:	Stuart
Last Name:	Young
Job Title: (where relevant)	[No Reply]
Organisation: (where relevant)	[No Reply]
Address:	<div></div>
Postcode:	
Telephone Number:	
Email Address:	

---

**1) Paragraph: 10.15**

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

**Please provide details you have to support your answers above**

The roads around the area are already far too busy. The A27 heading to the area from junction 8 of the M27 is already at gridlock because of the vast numbers of houses already built in the last few years. This will get worse with the proposal to build so many houses. The same goes for the gridlock at Junction 9 of the M27. Why do they not build houses on areas where there is room for expansion both in terms of land but also expansion of overall infrastructure.

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

Build houses in an area where there is space to deal with lots more people and cars.

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

It would need to be legally compliant in another area.

**Your suggested revised wording of any policy or text:**

Leave that to the lawyers.

**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

---