

Examination of the Fareham Local Plan 2037

Hearing Statement: Matter 11 Transport and Infrastructure

Hallam Land Management Limited

This Hearing Statement has been prepared on behalf of Hallam Land Management Limited. Hallam submitted representations to various stages of the Local Plan during its preparation.

Transport

Question 1. In light of the amended housing requirements in the Revised Publication Version of the Plan, the resultant change to the likely traffic growth in the borough and the impact on the operation of the strategic highway network, how has the Council:

- a. Identified the transport demands arising from the policies, allocations and growth aspirations of the Plan;**
- b. Assessed the impacts of policies, allocations and growth aspirations on the performance of the transport network (including the Strategic Road Network);**
- c. Identified any outcomes or mitigation as necessary;**
- d. Assessed the adequacy of any identified outcomes or mitigation; and**
- e. Identified any phasing and/or funding requirements necessary to ensure that the identified infrastructure measures are viable and deliverable?**

1. SCG007 explains that the Strategic Transport Assessment (TOI008) modelled a development scenario consisting of 12,169 dwellings across the Borough; a greater level of housing than in both the Publication Local Plan December 2020 (8,389 dwellings) and the Revised Publication Plan July 2021 (10,594 dwellings). Whilst the distribution of growth in the published Plan's development scenario does not exactly align to the distribution modelled in the STA, in both cases the scale of growth is less than was modelled. Of note is that Strategic Growth Areas identified in the 2020 Local Plan Supplement was included in this modelling.
2. FBC016 was prepared to take account of that different distribution derived from the allocated for development in the Revised Regulation 19 Plan.
3. Figures 6-3 and 6-4 in FBC016 display the forecast change in link delay, per PCU, for the AM and PM peak hours between the 2036 Scenario 2 Do Minimum and 2036 Scenario 1 Baseline. Figures 6-5 and 6-6 display the junctions forecast to have an RFC greater than 80% in the 2036 Scenario 1 Baseline and 2036 Scenario 2 Do Minimum respectively. Table 6.3 provides a list of junctions that are either "significantly" or "severely" impacted.
4. FBC017 specifically considers junctions where mitigation needs to be tested at this stage i.e., strategic mitigation. FBC022 and FBC023 reports on the results of that more recent work with the mitigation proposed at those identified junctions.

5. SCG007¹ indicates that “the overall transport impacts of the proposed allocations are likely to be capable of mitigation and the Plan is still considered to be deliverable and sound overall from a transport perspective, albeit with the potential need for some additional localised mitigation measures that will be derived through site specific transport assessments.” We understand at this remains the view of the Local Highway Authority in light of FBC017.

Question 2. Is it clear to decision-makers, developers and local communities what the necessary strategic highway improvements are as a result of the growth identified in the Plan, who will deliver the necessary improvements and when? Are they deliverable in the plan period?

6. Paragraph 10.15 of the Local Plan lists the locations where the Strategic Transport Assessment identified a need for mitigation measures to address the cumulative impact on the highway network from the scale and location of development up to 2037. This list now needs to be read alongside FBC017 which identifies other junctions where mitigation has been tested. The mitigation measures (i.e. highway improvements) identified in Pages 57 – 70 of FBC017 are considered to be of a strategic scale.
7. As these are junction improvements that arise because of natural growth across the network and the cumulative effect of traffic from new development within and outside the Borough, these are not considered to be directly related to any individual development proposals.
8. TIN2 encourages a sequential approach towards mitigation; measures to reduce/avoid travel, active travel or travel by public transport are to be considered ahead of highway improvements. These sequentially preferable measures will need to be explored for individual development proposals before considering highway improvements.

Transport Policies

Policy TIN1 Sustainable Transport

Question 3. Is the policy consistent with the Framework and is it effective?

9. This policy seeks to promote sustainable and active travel measures. The practical effect of this is to enable a genuine choice of mode of travel and reduce reliance on the private car. As a principle, this is consistent with *inter alia* paragraph 110 of the NPPF.
10. The extent to which individual development proposals can achieve the requirements of criteria a), b) and c) will vary depending on their location and their nature and type, and each development proposal will need to be judged as to whether it satisfactorily achieves these requirements.

¹ Statement of Common Ground with Hampshire County Council as the Local Highway Authority

Policy TIN2 Highway Safety and Road Network

Question 4. Is the policy consistent with the Framework and is it effective?

11. Criterion a borrows heavily from NPPF paragraph 111.
12. Criterion b concerns the mitigation hierarchy set out in paragraph 10.13 of the Plan which affords a priority first to measures that would avoid/reduce the need to travel, active travel and public transport prior to the provision of improvements and enhancements to the local network or contributions towards off-site improvement schemes. This approach accords with paragraph 110 of the NPPF.
13. Moreover, this approach reflects the direction of travel of the County Council's new Local Transport Plan. Paragraph 3.5 of SCG007 states:

"The Local Highway Authority is in the process of developing a new local transport plan with new development planning policies and guidance. Over the next local plan period this will change the highways planning context within which developers should bring forward their sites. In practice this means the local highway authority and FBC will be looking for developers to avoid the need to mitigate development impact through highway capacity schemes (as has been tested in this local plan TA) and instead use master planning to reduce car dependency and the need to travel and to design their developments around people not cars." (emphasis added)

14. The extent to which individual development proposals can achieve the requirements of criterion b) will vary depending on their location and their nature and type, and each development proposals will need to be judged as to whether it satisfactorily achieves these requirements.

Question 5. Is it clear what is meant by 'active travel'?

15. Active Travel is defined in the Plan's Strategic Priorities (no.12) as modes such as walking and cycling. It is not listed in the Plan's Glossary presently.
16. Public Health England² refers to " 'Active travel' (or active transportation or mobility) means walking or cycling as an alternative to motorised transport (notably cars, motorbikes/mopeds etc) for the purpose of making everyday journeys".

Infrastructure Delivery

Question 7. Does the Infrastructure Delivery Plan (IDP) provide a robust evidence base to support the infrastructure needs of the plan? The IDP is based on a housing need lower than that proposed in the submitted plan. What are the implications? Does the IDP need to be reviewed?

17. The Infrastructure Delivery Plan (TO1007) is dated September 2020 and was prepared alongside the first Regulation 19 Plan. It does not include the allocations made in the Revised Regulation 19 Plan prepared in 2021.

² Working Together to Promote Active Travel (2016)

18. That said, the various infrastructure requirements in Section 4 and influencing factors in Section 5 are evident when looking at the infrastructure requirements that are listed alongside the allocations in the Revised Publication Local Plan. For example, HA55 is required to provide pedestrian and cycle routes and public transport, publicly accessible green infrastructure, a new primary school with early years provision, local community and healthcare space, sports pitches and specialist accommodation. Each of these are identifiable themes in the IDP.
19. Moreover, the Council has CIL that will secure monies for other infrastructure requirements, including, significantly, highway works.³

Question 8. Have the additional housing sites allocated in the Revised Publication Version of the Fareham Local Plan, ie. FTC7-9, HA46-56 and BL1, been assessed in terms of their individual infrastructure needs and their cumulative impact? If not, how does the plan ensure that their infrastructure needs are met and that impacts of development are appropriately mitigated?

20. In the main, the new allocations have a policy criterion referring to *Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4 and NE3*. TIN4 requires new development to provide and contribute towards the delivery of new or improved infrastructure, or other mitigation, to mitigate the impacts of the development. Policy NE3 requires either on site provision of green infrastructure or financial contributions to avoid or mitigate recreation disturbance at the Solent SPA.
21. In addition, the two large allocation HA55 and HA56 have more specific requirements derived from the mixed-use nature of the proposed development and the greater ability for uses to be provided that meet existing needs in the Borough (e.g., the sports hub at HA55).
22. The individual policies for these allocated sites include elements of community infrastructure that should be provided as part of the development. Where there is an identified need for strategic highway improvements, these are listed in the Policy (e.g., Delme Roundabout in Policy HA56). No strategic highway improvements have been identified in conjunction with HA55.

Question 9. In broad terms would the plan be effective in ensuring the provision of infrastructure to meet future development needs. Are there any areas of constraint which could impact on the delivery of the growth proposed in the plan? If so, how will these be addressed?

23. This is a question for the Council in the first instance.

³ Fareham Borough Council Annual Infrastructure Funding Statement March 2021 (Annex C)

Infrastructure Policy

Policy TIN4 Infrastructure Delivery

Question 10. Are the requirements of the policy clear and effective? Is it clear what other mitigation includes?

24. Policy TIN4 requires the following:
- i. Developments to provide and contribute towards the delivery of new or improved infrastructure, or other mitigation, to mitigate the impacts of the development.
 - ii. new or improved infrastructure to be provided in a timely manner.
 - iii. A preference for on-site mitigation as an inherent part of the development, unless it is better provided off site.
25. An example of “other mitigation” is given in paragraph 10.29 of the supporting text.

Question 11. Should the Plan provide greater clarity in terms of the types of infrastructure the policy relates to?

26. Paragraph 10.25 defines infrastructure as transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy and health education and cultural infrastructure. This is the list provided in the NPPF at paragraph 20. These are generally consistent with the themes within the IDP, save for minerals which is not referred to in the IDP and is a matter for the Minerals Planning Authority.
27. The infrastructure requirements associated with individual development proposals will vary in each instance; not all development will require the same infrastructure provision. If this list were included in the policy, it would therefore need to be prefaced by “where necessary” or similar.

Question 12. Is it clear how the policy will be implemented?

28. Implementation of the Policy requires planning obligations or planning condition as set out in paragraph 10.31 - 10.34.
29. Paragraph 10.35 explains that CIL receipts will be the primary mechanism for contributing towards the provision of Borough-wide off-site strategic infrastructure to support the wider needs of the Borough. This is an important qualification for how Policy TIN4 is to be implemented and the extent to which it applies to infrastructure directly related to an individual proposed development rather than infrastructure that is required because of the accumulation of natural growth, existing deficiencies, and the overall scale of new development cumulatively.