

**Fareham Local Plan 2037  
Revised**

**Examination Statement  
Matter 6  
Site FTC3**

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**Prepared on behalf of Raymond Brown Rookery Properties**

**February 2022**

**Ref: F-376-3-LE**

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## 1.0 **Preamble**

- 1.1 This Statement has been prepared by Southern Planning Practice Ltd on behalf of Raymond Brown Rookery Properties who own land at Rookery Farm, Botley Road, Swanwick which was allocated in the Supplement to the Draft Local Plan in January 2020; however, it was subsequently removed as an allocation from the Regulation 19 Submission Version of the Local Plan.
- 1.2 It is pertinent to note that representations have been made on behalf of our client, Raymond Brown Rookery Properties throughout the preparation of the emerging Local Plan. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan, this statement draws on previous responses where necessary.
- 1.3 This Statement is prepared in response to the Inspectors' Matters, Issues and Questions – Matter 6 – Housing Allocations and in particular in respect of the following proposed allocations:
- FTC 3 Land East of Fareham Station
  - FTC4 Land West of Fareham Station
  - HA42 Land South of Cams Alders
  - HA55 Land South of Longfield Avenue
  - HA56 Land West Of Downend Road
  - BL1 Town Centre
- 1.4 This should not be taken to be the only sites to which objection is raised on grounds of soundness but we do not wish to repeat the representations we have earlier submitted in December 2020 and July 2021, which remain before the Inspector. We have therefore focused these further statements on a small number of key sites which we consider are unsound and should not be allocated. The assessments which are submitted individually are accompanied and supported by a number of Appendices.

## 2.0 Introduction

- 2.1 The site is located on the eastern side of Fareham Railway Station with access directly from the roundabout at the junction of West Street, Western Way and the A27. Though there are two businesses that are accessed via Gordon Road (a cul de sac to the eastern side of the site).
- 2.2 The site currently includes local businesses, unoccupied industrial premises and the Hampshire Fire and Rescue Service and a privately operated car park.
- 2.3 There is also an aggregates depot that is accessed through the site. The aggregates depot is safeguarded in the Hampshire Minerals and Waste Plan 2013 (HMWP). Note the following
- Letter from Aggregate Industries UK Ltd (occupiers of the site) outlining this point (**Appendix A**)
  - Comment from HCC indicating that the HWMP needs to be a material consideration - **Appendix B**.
  - Letter from Network Rail – Indicating the possible difficulty of land assembly (3rd party interests) and the need to retain car parking. **Appendix C**
- 2.4 The local plan indicates that the site is capable of providing opportunities for a mixed-use area including new residential, retail and café uses, and potential business development. However, there is no layout plan indicating how this would be achieved while retaining and protecting the aggregates depot or the station car park, both of which are essential sustainable infrastructure components. Nor is there any indication of how existing businesses would be relocated/accommodated, in particular the fire station.
- 2.5 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.
- 2.6 Such an ambitious scheme would appear to depend on a comprehensive approach, particularly given the limited access options. However 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.

### 3.0 Key Issues

#### 3.1 General

- Much of the site comprises the railway station car park and this is essential in encouraging rail travel. The policy refers to retention of sufficient car parking to serve the railway station without saying how much this is. However, the loss of any car parking will undermine the role of Fareham Railway Station as transport hub.
- In relation to the provision of new parking the council response is blasé in that Residential parking shall be delivered using undercroft and other land efficient arrangements where necessary. However, no mention is made of the cost implications for underground parking or the requirement for business parking.
- The relocation of the fire station will only proceed if the new location meets the operational requirements of the fire service that covers this area. No details have been put forward as to alternative sites, timescale etc. If no alternative site is found the fire station may need to be retained on site if it cannot be relocated. This would have implications for the developable land, and the noise from alarms associated with emergencies.
- The adjacent aggregates yard has the potential to have a detrimental impact on the site in terms of dust and noise. There is no comment as to how the proximity of the aggregates yard could be accommodated especially when the aggregates yard is over half the depth of the suggested allocated site and access must be retained for lorries.
- No evidence has been put forward to show that the maximum 5 storey height would not be too high. It has not been shown how, in light of the above, the proposed development at the scale outlined could be satisfactorily achieved. Given the constraints of the site the any future development of the site would not meet the NPPF requirements for achieving well designed places set out in paragraphs 124-127
- Land assembly could be difficult and would involve many parties. There is an indication that discussions are taking place but not with whom and to what extent this has progressed.

### 3.2 Highways

- Comments from Paul Basham Associates (see appendix 1 for full letter): -
  - SYSTRA has been commissioned by Fareham Borough Council (FBC) to apply Solent Transport's Sub-Regional Transport Model (SRTM) to help inform the update to Fareham's Local Plan. The SRTM has been used to model the proposed land allocations and identify key transport implications resulting from the scale and location of the allocations.
  - A review of the SYSTRA report confirmed that in all 3 scenarios: -
    - Scenario 1 – 2036 Baseline, no Fareham Local Plan development except for committed sites. '
    - Scenario 2 – 2036 Do Minimum, full Fareham Local Plan development without transport mitigation. '
    - Scenario 3 – 2036 Do Something, full Fareham Local Plan development with transport mitigation
  - Station Roundabout was flagged as having a 'significant' increase in ratio of flow to capacity (RFC) which demonstrates that there is insufficient capacity at the roundabout and journey times will be impacted.
  - Car parking for both Fareham Railway Station and the residential dwellings will need to be provided. It is not known at this time whether there would be any reduction in the amount of parking provided for the railway station to enable the proposal (and this is unlikely to actually be confirmed until such time as any application plans may come forward).
  - The Local Plan suggests using undercroft parking as a solution for the residential scheme which may add a substantial cost to the site and affect the viability. The practicalities of car park management would also need consideration, ensuring commuters are kept from parking in residential spaces and vice versa.
  - Whilst difficult to criticise the broad sustainable credentials of the site from an accessibility perspective, the most direct route from the site to Fareham Shopping

Centre (along West Street), is signposted for cyclists, however for most of the route cyclists are required to ride in the busy carriageway, with limited dedicated cycle lane provision.

*FTC3 – Land east of Fareham Station and FTC4 – Land west of Fareham Station*

- The two developments east and west of Fareham Train Station would have an impact on Station Roundabout, which is noted as having a ‘significant’ increase in RFC under Scenario 1, without the Local Plan development schemes. Should the schemes’ progress the current evidence base indicates an increase in delays at the roundabout, making the use of the train station potentially less desirable for commuters (who may then choose to drive rather than use the train) and potentially delaying local bus services at a key junction within central Fareham.
- The Local Plan identifies that an air quality assessment would need to be provided in relation to the A27 (in accordance with Policy NE8). This would be to identify appropriate measures to mitigate NO2 emissions arising from the development. It is likely that any increase in trips would lead to an NO2 emissions increase on the A27 during peak times, which could also impact on both Fareham Station developments.



#### 4.0 **Response to Inspectors Questions**

4.1 In terms of questions by the inspector there is only one relevant to this allocated site (Matter 6. Question 6) which asks: -

***Are the sites allocated for housing in Policies FTC3-9, HA1-HA56 and BL1 soundly based; are the site-specific requirements set out in the relevant policies justified and effective and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in the Council's trajectory?***

4.2 Having regard to the above comments it is argued that the allocation is not: -

- soundly based
- based on justified and effective policy
- deliverable in the time scale

4.3 This is a site 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. It therefore remains our conclusion that the allocation is UNSOUND and should be deleted.



## APPENDIX 1

26<sup>th</sup> January 2021



Planning Strategy  
Fareham Borough Council  
Civic Way  
FAREHAM  
PO16 7AZ

Your ref:  
Our ref: CH/Fareham

Dear Planning Strategy

### **FAREHAM LOCAL PLAN 2037 – PUBLICATION VERSION**

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

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

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

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

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

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

Yours sincerely

**On behalf of Aggregate Industries UK Ltd**



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## APPENDIX 2

**Fareham Borough Council Draft Plan Issues & Options Consultation  
Hampshire County Council Response – July 2019**

Subject / Theme	Comments
<p><b>Transport and Access</b></p>	<p><b>Q1. What type of development do you think should be encouraged both in the town centre and other centres.</b></p> <p>The Highway Authority supports mixed-used development and higher densities within and adjoining the town centres to promote self-containment and reduce the need to travel. The development should include housing and employment which is located close to existing services and facilities so that these can be readily accessed by walking, cycling and public transport links. All the town centres provide ample opportunities to improve access by bus, walking and cycling.</p> <p>Public transport is likely to be more viable in the town centres and the larger development sites can provide a more comprehensive package of s106 highway mitigation measures to promote access by sustainable transport modes.</p> <p>The sites in Fareham town centre must also address the identified air quality exceedances for nitrogen dioxide along sections of the A27 corridor in Fareham town centre.</p> <p>In addition, any development site must take into account the recommendations of the emerging Local Cycling and Walking Infrastructure Plan for the Fareham borough.</p> <p><b>Q2. Do you support the Council in continuing to allocate brownfield sites that are likely to deliver homes in the period we are planning for?</b></p> <p>The Highway Authority supports brownfield sites particularly where access can be provided by walking, cycling and bus and where the incremental traffic impact can be accommodated on the local and strategic highway network. The brownfield sites should focus their interaction towards the town centre and local facilities. Brownfield sites provide the ideal opportunity to provide practical connections to the existing and proposed public transport and cycle networks. Brownfield sites should be investigated first before building on greenfield sites or in the strategic gap.</p>

Masterplanning of brownfield sites should take account of the need for permeability, to maximise opportunities for existing communities and to reduce/remove severance wherever possible.

**Q3. Do you think that the land between Fareham and Stubbington could support good growth whilst preventing the two communities from joining up?**

The Highway Authority does not support additional development in the Strategic Gap between Fareham and Stubbington because there is very limited opportunity for housing growth in Stubbington based on the current local facilities.

The Highway Authority would wish to highlight that Stubbington bypass has planning permission and that this infrastructure is primarily to provide highway capacity to support access to the Gosport peninsula and access to jobs and regeneration in Gosport. To maintain the efficient functioning of the bypass any new direct access to the bypass must be restricted so as not to contribute to increased levels of out-commuting from the peninsula in the morning peak periods.

**Q4. If the transport constraints could be resolved do you think the land west of Portchester could support good growth?**

The Highway Authority recognises that there are opportunities for housing development in Portchester which can be served by the local shops and services together with the regeneration of Portchester precinct. The A27 through Portchester is a key strategic corridor (and diversion route for the M27) and the priority will always be to maintain this road hierarchy by not adding unacceptable additional delays to the efficient functioning of this corridor. Any housing site will need to demonstrate that it is accessible by walking, cycling and public transport and will need to assess the impact of additional traffic joining the A27 corridor.

All housing sites must connect and integrate with the South East Hampshire Rapid Transit (SEHRT) corridor - Fareham to Portsmouth - and improve the east-west cycle route including connections to the local key destinations (railway station and schools).

In addition, all proposed housing sites must address the identified highway safety aspect of the A27 corridor and the current DfT Safer Roads Fund scheme in Portchester.

**Q5. Would you support small scale development or larger scale if close to Swanwick railway station?**

The Highway Authority supports the opportunity to intensify the use of Swanwick railway station with improved access by walking and cycling. Any new small-scale development at the station should address the inadequate bus, walking and cycling connections to the Segensworth business parks.

HCC also support the proposals being investigated by DfT, Highways England and others for a Swanwick Parkway and a new pedestrian/cycle access across the M27 which should be taken into account if allocating a development site at Swanwick station.

**Q6. Would you support limited small-scale development in the land to the west of the Western Wards (Warsash/Locks Heath)?**

The Highway Authority does not support additional small -scale development in the western wards due to the impact of the trips generated on the A27 corridor and the limited scope for highway capacity improvements along the single carriageway sections of the A27 west of Segensworth. There is also limited scope to improve public transport along the A27 into Fareham. Currently the SEHRT proposals do not extend west of Fareham town centre.

In addition, due to the proximity of the western wards to Southampton, there may be opportunities to improve existing cycle access by integrating with the cycle schemes being investigated by Southampton City Council as part of the TCF bid proposals for the Southampton City region. The TCF bid includes strategic cycle network proposals for routes from Southampton towards Fareham town centre which features the main corridors in the western wards of Fareham.

**Q7. Areas for future growth within the borough?**



The local plan proposals need to maintain the function of the M27 and A27 for strategic connectivity in the Solent area and to maintain operational effectiveness of the key corridor. Current strategic highway schemes include the Highways England Smart motorway programme for M27 junctions 4 to 11 and the HCC scheme for M27 junction 9 and Parkway South roundabout. The Welborne strategic development also includes commitments to improvements to the M27 junction 10 and to provide bus links into Fareham town centre.

Any local plan proposed site needs to maintain and improve the safety and capacity of the local highway networks linking town centres to the strategic network. These main transport corridors also provide the

	<p>opportunity to further develop and integrate with the SEHRT proposals within the borough and linking to adjoining boroughs. This will help reduce reliance on the already heavily congested M27 and A27 corridors.</p>
<p><b>Adult Extra Care / Specialist Housing</b></p>	<p>Across the County currently 1 in 10 of people are over 75 years in age. In the next seven years the number of residents aged 75 years and over will increase by 30%. An estimated 14% increase in the 85-89 year old age range is expected in the next five years and an even higher 26% increase in those aged 90 and above, Inevitably longer lives mean more people succumb to illness and lose the ability to care for themselves.</p> <p>There are an increasing number of younger adults with highly complex needs surviving into older age. The number of people aged 18 years and over predicted to have a learning disability is projected to increase by 11% over the next five years. The future requirement for supported living accommodation, including Extra Care, is set to increase by over 60% in the next 5 years.</p> <p>Supported housing in the form of Extra Care Housing schemes are a fundamental and growing component of the County Council's service, enabling people with support needs to live in the community with care on site.</p> <p>The County Council's Adult Health and Care Strategy aims to double to quantity of Extra Care housing provided for older persons in response to the demands created by an ageing population. The Strategy also aims to expand Extra Care specialist provision for younger adults (18 yrs+), for instance those who have learning disabilities and autism spectrum conditions.</p> <p>The County Council is implementing this strategy by development of its own land, working in partnership with Districts, Registered Providers, developers and landowners and securing provision through S106 Agreements on large market led sites.</p> <p>In order to meet needs the County Council wishes to see Affordable Extra Care Housing provided on large developments across the County. This it sees as a way of meeting local housing and care needs, creating mixed, inclusive, sustainable communities and meeting the changing needs of new communities over time. Extra Care Housing makes a valuable contribution to the local housing market. It increases numbers (at a high density), increases choice and diversity and creates churn (e.g. through downsizers), freeing up other affordable housing for re-let/sale.</p> <p>The aim is to place Extra Care Housing at the heart of the community, in or adjoining local centres. This approach has a multitude of benefits – reducing social isolation, making services easily accessible for</p>



<p><b>Page 6</b></p> <p><b>Page 7</b></p>	<p>residents, increasing footfall in local centres from residents and their visitors and providing the opportunity for the provision of facilities that are open to the wider community.</p> <p>Accessible housing is important to meet the changing needs of the whole population, and particularly helps meet the needs of the older population given the correlation between age and mobility. Housing built to higher levels of accessibility creates greater choice and diversity in the market place and supports community sustainability by allowing individuals to remain in their own community should their circumstances change. Hampshire County Council Adults Health and Care Strategy: <a href="http://documents.hants.gov.uk/adultservices/publications/AdultsHealthandCareFiveYearStrategy.pdf">http://documents.hants.gov.uk/adultservices/publications/AdultsHealthandCareFiveYearStrategy.pdf</a></p> <p><b><u>Issues &amp; Options document:</u></b></p> <p>The County Council consider that it is important to meet the needs of vulnerable members of the community including older people and those with support needs. Affordable housing solutions should be designed to help meet those needs, including the provision of Extra Care Housing.</p> <p>Providing accessible homes across tenures is important in meeting the existing and changing needs of communities and ensuring everyone has a home that meets their requirements. All new homes should be built to the higher levels of accessibility as set out in the Building Regulations unless this is not practical or viable.</p>
<p><b>Minerals &amp; Waste Safeguarding</b></p>	<p>Hampshire County Council as Minerals and Waste Planning Authority (MWPA) responded to Fareham Borough Council on the previous iteration of the local plan (now withdrawn) when specific sites had been identified and were available for comment. Those comments highlighted the importance of considering the adopted Hampshire Minerals and Waste Plan (HMWP) (2013) and the relevant safeguarding policies. The MWPA would be looking for acknowledgement of the HMWP (2013) within the Fareham Borough Council Local Plan. The MWPA appreciate there are not specific sites detailed in the Issues &amp; Options document (more possible 'areas' for development) however, it would raise with Fareham Borough Council at this stage that some of these areas do fall within safeguarded mineral areas and / or contain safeguarded waste sites. Therefore, the HMWP (2013) would need to be considered as part of the plan making process, specifically policy 15 (Safeguarding – mineral resources), policy 16 (Safeguarding – mineral infrastructure) and policy 26 (Safeguarding – waste infrastructure). THE MWPA would recommend that the Borough Council bear in mind this adopted planning policy for the future stages of its Plan making.</p>

	<p>The MWPA would be happy to provide further comments as the draft Local Plan progresses and specific sites become more defined.</p>
<p><b>Public Health</b></p>	<p>Following meetings with Fareham Borough Council, Hampshire County Council as the competent Authority responsible for Public Health have collated a background report on key public Health issues that the Borough Council should consider as part of the local plan making process. The report (alongside previous comments on the withdrawn local plan) are attached for reference:</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>2019-07-05 Supporting Health I</p> </div> <div style="text-align: center;">  <p>2019-06-24 Public Health Response to</p> </div> </div>
<p><b>Children’s Services – School Places</b></p>	<p>Hampshire County Council has a statutory duty to:</p> <ul style="list-style-type: none"> <li>• Ensure sufficient childcare is available to meet the Early Years free entitlement as far as reasonably practicable;</li> <li>• Ensure sufficient maintained school provision is available to meet the needs of all Hampshire children aged up to 16;</li> <li>• Ensure sufficient post-16 provision is available for all Hampshire children;</li> <li>• Give priority at all ages to meet the needs of children with special education needs and disabilities (SEND), learning difficulties and/or disabilities up to 19 (in some cases 25);</li> <li>• Support all maintained nurseries, schools and Post-16 provision to function as high-quality, viable and financially efficient services; and to</li> <li>• Ensure fair access to educational opportunity and promote diversity and parental choice.</li> </ul> <p>It is the County Council’s role to plan, commission and organise school places in conjunction with the Regional Schools Commissioner in a way that promotes the raising of standards, manages supply and creates a diverse infrastructure.</p> <p>The main principle of current and future provision is that the County Council will seek to provide local schools for local children</p>

The level of additional housing identified in the local plan will lead to additional primary and secondary age pupils. The length of time covered by the plan period will need to be considered in the planning for any additional pupil places that may be required, due to the fluctuations that occur in the number of births, house building rates and other demographic changes. Thus, the planning and provision of additional school places is an increasingly complex task due to these factors.

The assessment of the demand for future pupil places is an on-going task and this will continue to be the case as housing plans become clearer and phasing of additional dwellings is known. Continued liaison with the Borough on this matter will be key.

The requirement for any additional pupil places, and associated infrastructure, will be identified as soon as possible so details can be provided to Fareham Borough Council and the developer to assist with financial planning of schemes.

#### **Special Education Needs and Disability (SEND)**

A strategic review of Hampshire's SEND provision is currently being undertaken and is due to be published in 2019. The strategy assesses the county wide need for SEND places against current provision and will consider this alongside new school and resourced provision. Hampshire special schools have a good reputation for the quality of educational provision they offer to pupils, some of which have the most severe long term and complex educational needs. The educational offer to children with SEND also includes resourced provision within mainstream schools. The impact from new housing will need to be assessed against the requirement for additional places for pupils with SEND, and associated mitigation sought.

The inclusion of the need to mitigate the impact on school places and early years facilities is welcomed. As noted above this will also need to account of any need for additional SEND places.

It is important that future site allocations should enhance connectivity of places including footways and cycle paths. Access to local schools should promote active travel and discourage the use of the car for travel to school. This should include ensuring necessary improvements are made to existing routes between future development and local schools.

#### **Forecasting School Places - Housing Developments**

	<p>A detailed database of all the housing developments planned within schools' catchment areas is used to generate projections of new housing and pupil yield. Across the County as a whole the pupil yield for primary schools averages out at 30 primary age pupils per 100 dwellings, for secondary the figure is 21 pupils per 100 dwellings. Not unsurprisingly given the diverse demographic nature of the county, the location, type and size of different developments generate a range of pupil yields. The model also recognises the staggered effect of secondary pupil yield over a number of years given the majority of pupils moving into new housing are of pre-secondary school age.</p> <p><b>Developer Contributions towards additional school places</b></p> <p>In line with central government guidance on developers' contributions the County Council expects financial contributions from developers in order to fully mitigate the impact of their development on children's services facilities.</p> <p>In order to provide a guideline cost of providing additional places, a detailed analysis has been undertaken, based on actual projects designed and tendered in recent years resulting in separate costs per place for new primary and secondary schools and for extensions to existing schools. Please refer to the full Developers' Contributions towards Children's Services Facilities document at:</p> <p><a href="http://www3.hants.gov.uk/education/schools/school-places.htm">http://www3.hants.gov.uk/education/schools/school-places.htm</a></p>
<p><b>Library Services</b></p>	<p>Hampshire County Council Library Service, in its role as a public service provider, has an on-going responsibility for the review of the library services it delivers as part of its <i>Library Service Transformation Strategy 2016 to 2020</i> to improve its service offer to the local community and residents of Hampshire. HCC Library Service currently has 4 Libraries within Fareham Borough: Fareham Library, Stubbington Library, Portchester Library and Lockwood Library.</p> <p>Fareham is categorised as a Tier 1 Library, Tier 1 being the largest and busiest Libraries, providing widest range of services.</p> <p>Lockwood, Portchester and Stubbington Libraries are Tier 2 Libraries, usually found within a medium-sized town.</p> <p>The different Tiers of library and the services they provide could be found at:</p> <p><a href="http://documents.hants.gov.uk/libraries/LibraryServiceTransformationStrategyto2020ApprovedVersion.pdf">http://documents.hants.gov.uk/libraries/LibraryServiceTransformationStrategyto2020ApprovedVersion.pdf</a></p>

The Strategy to 2020 provided the platform to modernise the service we offer and the way it is delivered. We are currently developing our strategy to 2025 and beyond, ensuring that the service we deliver in the future is right for Hampshire and its residents.

There are three emerging areas of focus for the Library Service:

- Developing literacy, particularly focused on early years;
- Broadening the reach and effectiveness of public services in Hampshire and supporting resilient communities; and
- Supporting a Digital Hampshire, particularly in areas of digital inequality

These three areas of focus must be underpinned by a sound commercial mindset with a relentless focus on income generation and rigorous financial management.

This means that as part of the Transformation Strategy, HCC Library Service will potentially explore new service delivery models with the concepts such as *cohabitations* and *diversifications* that offer a range of services at one service location or through joint service provision with partner organisations. Gosport Discovery Centre is a successful example of the delivery of the two concepts, which there is a combination of different services, including a library that is provided at one Community Hub location. Investment in Fareham Library, in particular, is sought to further develop this building as a Community Hub, offering a range of services under one roof.

In response to the changing needs of communities, the changing use of public buildings and a desire to increase the productive capacity of public assets, Hampshire Library Service is also keen to implement the Open Plus model of Library Service Provision:

“Provision of unstaffed static libraries (Open Library Programme)

We are also investigating the idea of utilising appropriate digital technology to extend library opening hours without the associated staffing costs. This would allow our customers to issue or return books using the self-service systems, or to use other services e.g. printing, photocopying and study areas. Customers that require library support will still be able to choose to visit at times when there will be paid staff on duty”

Library Service Transformation Strategy to 2020

To implement an Open Plus Library requires investment in extra infrastructure, such as automated entry, security considerations and CCTV. Hampshire Library Service has already invested in Self Service technology, which can be exploited to support an Open Plus Library model. Hampshire Library Service would seek CIL funding to support trialling Open Plus under the Fareham Borough Council Regulation 123 list item “Community Centres”. Please see also our response to the Fareham Borough Council Infrastructure Delivery Plan Review: June 2019

Considering also Local Plan Part 3: The Draft Welborne Plan April 2013 and the associated response from Hampshire Libraries, it is no longer deemed suitable to instigate a community led Library within the proposed community buildings in Welborne. The existing Library Infrastructure in Fareham Borough is able to meet the extra demand which will put upon them by the 6000 houses that will make up the Welborne development.

Instead, priority should be given to implementing an Open Plus system at the library in Fareham and at Lockwood, Portchester and Stubbington Libraries. The Open Plus system will allow these libraries to be accessible outside of core hours at a lower cost, providing a better access to a range of services for the community.

HCC Library Service considers these approaches economically sustainable and effective. In relation to these aspirations, an approach to highlight in the Transformation Strategy is to share library buildings with partner organisations for several services to be accessed to one visit. Through this approach, HCC Library Service will have lower building running costs by sharing with other partner organisations and also fulfil the objectives to provide diversified and improved library services.

On this basis, the Transformation Strategy could potentially involve the relocation and/or re-provision of services to an alternative location to continue to meet operational needs and may also necessitate the rationalisation of surplus facilities and/or disposals, by reinvesting the proceeds of sale to support the deliverability of such re-provision (if required during the Plan period). This approach is supported by [Circular 06/03: Local Government Act 1972](#) General Disposal Consent (England) 2003 – “best consideration for the disposal of land”.

Alongside *Library Service Transformation Strategy 2016 to 2020*, HCC as a Library Service supports the intentions of the Borough Council’s policy position CF1: Community and Leisure Facilities within the Urban Area. However, the current position re: Policy CF3: Loss of a Community Facility is considered unsound as it is not effective in recognising the role of public services and how they function. The requirement for a 12-

month marketing assessment to prove that a facility is surplus to requirements can be inappropriate and impose unnecessary delay in securing much-needed funding for public services.

In its role as a public service provider and duty to co-operate body, HCC would recommend that appropriate flexibility is given to public service provider such as the County Council (including the loss or disposal of a facility no longer needed) in order to facilitate any operational service changes to the libraries within Fareham Borough that may be required during the Plan period to 2036 as part of HCC's transformation strategy to distinguish between commercially-run and publicly-owned or managed community facilities.

It is noted that Development Management Policy SD43: New and existing community facilities (2) in the Pre-Submission South Downs Local Plan recognises the difference between commercial and public facilities and requires a marketing exercise only for the former. It is suggested that any emerging Community Services and Facility Policy in the next Fareham Borough Council (FBC) Local Plan should adopt a similar approach. This is in order to be effective in line with the duty to co-operate (Localism Act 2011) placed on FBC to respond to the operational needs of the County Council as a public service provider that influences the nature of places and how they function.

As stated above, the existing Library Infrastructure in Fareham Borough is able to meet the extra demand which will put upon them by the proposed 420 houses that will be built annually until 2034, however the stock level for these libraries will not meet the minimum level recommended by the National Library.

The National Library standard upper threshold cites a recommended stock level of 1,532 items per 1000 population. The population of Fareham borough was reported in 2017 at 116,219. Current stock levels in the four branches stand at c.106,000, below the recommended level above.

*Continued on the next page.*

Hampshire Library Service will seek Section 106 contributions to meet this shortfall in stock levels.

Population of Fareham Borough 2017	116,219
Current Stock in Libraries within Borough Boundaries	106,000 items
Current stock shortfall	10,000 items
Required investment to make up stock shortfall (based on average price of stock item of £10 from Askews Library Service September 2017)	£100,000
Expected new homes per year until 2034	420
Expected population increase per year until 2034 (based on national average of 2.4 occupants per household)	1,008
Recommended stock increase for expected population per year (population x 1.532)	1,362 items
Required annual investment to make up stock shortfall (based on average price of stock item from Askews Library Service September 2017)	£13,620

**Public Rights of Way and Countryside Access**

Hampshire County Council Countryside Service is responding in respect of Public Rights of Way, and managers of Country Parks and Countryside Sites within and around Fareham Borough.

The County Council is pleased to note that the protection of green space in the community and improvement of air quality in Fareham are raised as two of key issues in the consultation document. It would suggest that in addition to the protection of local Green Spaces, the protection of larger natural greenspaces, areas of farmed countryside, habitats of principal importance & adequate buffers, statutory and locally designated sites should also be considered as part of the draft Local Plan making.



Transport network improvements are highlighted in the consultation. Future transport network improvements should be designed and implemented to provide layouts which are compatible for all users and encourage the use of sustainable and active transport modes, whilst also protecting and where possible, enhancing access to public rights of way.

It is noted that consideration is given to landscape sensitivity and agree that there is a need to consider this issue in developing local plan policies especially in relation to protecting the most valued landscapes.

It is noted that the Fareham Today Local Plan Update does not at this stage appear to highlight the issue of ecological sensitivity and that limited reference is made to the importance of European Protected sites and coastal habitats within the Borough. The County Council would expect these important issues to be considered in full at the draft plan stage through robust plan policies.

It is noted that the Borough recognise that without appropriate mitigation, new development could have a negative impact on both human health, ecology and the natural environment. The County Council therefore support the Borough Council's aspiration to mitigate potential environmental impacts of new development.

Understanding the impacts of future development, working with a broad range of organisations (including the County Council which hosts Bird Aware Solent) to ensure that the necessary mitigation is secured as part of the planning process will be critical to delivering sustainable places across Fareham Borough.

The impacts of future development on Hampshire County Council Countryside sites as well as its managed farmland (which includes: Titchfield Haven National Nature Reserve, Chilling and Brownwich Estate, Hook with Warsash, Wicor and Fort Nelson) will need to be considered as part of preparing the Fareham Borough Local Plan so that adequate and appropriate mitigation opportunities can be developed for these sites.

The County Council is supportive of the requirement that developers are responsible for the delivery of suitable infrastructure through legal (section 106) agreements. It is recommended that these developments should contribute to Green Infrastructure projects and are fully integrated to maximise opportunities to connect to the rights of way and wider GI networks.

Countryside Services have the following observations to make regarding land for new housing:

**Land between Fareham and Stubbington**

Fareham Footpath 68 runs along the northern part of the site and connects with Fareham Footpath 70 and Footpath 74 and 71A around the north of the Sewage Treatment Works. The Rights of Way network will be affected by the Stubbington Bypass and the County Council recommend future Greenbelt, local or strategic gap policies should seek to protect and enhance the Rights of Way and green infrastructure networks, providing buffers to routes and improving connections for sustainable transport and non-motorized vehicles.

#### **Land west of Portchester**

Fareham Footpath 111a provides access to Wicor countryside site and Fareham Footpath 117 access to downland habitat and green space at Fort Nelson within this area. The Rights of Way should be protected and where necessary improved and surfaced to mitigate for any increased pressure upon these assets which development would generate. The use of Fareham Footpath 117 for vehicular access for Land to the East of Downend Road proposed in previous proposals is not in accordance with guidance and would not generally be supported by the Countryside Service who have identified improvements to the rights of way network which can be made within this area.

It is suggested that consideration for Rights of Way and green infrastructure, which provides links to natural green space, should be given to future site assessments, design and masterplanning work for potential site allocations. Financial contributions should be secured to enhance the Rights of Way network and help mitigate for increased recreational pressure. Impacts on the Coastal Path, Portsdown Hill, the Solent European Sites / Portsmouth Harbour and Brent Geese sites should be avoided in accordance with NPPF and local policy.

#### **Meon Valley**

The Fareham Today Local Plan Update does not make reference to the Titchfield Haven National Nature Reserve and Site of Special Scientific Interest, adjacent important habitats and sites which support Wild Birds. The Strategic Gap policy has served to provide a vital buffer and protection to Titchfield Haven.

The high value of the landscape referred to in the consultation arises in part from the presence of the National Nature Reserve in the valley floor and the enjoyment of views gained from public access points provided by Rights of Way in and adjacent to the site which is owned and managed by Hampshire Countryside Service.

In line with Natural England guidance, it is recommended that a minimum 400m undeveloped buffer should be provided. The ecological sensitivity of Titchfield Haven and the surrounding habitats which support and

buffer the Nature Reserve should be taken into account when considering future site allocations in the Fareham Borough Local Plan.

The Solent Way runs along the coast in this area. Impacts to Titchfield Haven NNR / SSSI and the Solent European Sites should be avoided, and the Coast Path protected. Where appropriate the Coast path should be enhanced in accordance with NPPF and local policy.

#### **Land south of Locks Heath**

The landscape value of this area arises in part from access gained from the Public Rights of Way network and the National Nature Reserve. The Solent Way runs along the south of this area and provides a valuable asset / resource for residents and visitors. This relatively undeveloped tranquil area provides a rural network of footpaths. There is a need to protect the network and also potentially provide enhancements to the Solent Way while avoiding negative impacts on sensitive landscapes and protected areas. Negative Impacts to Titchfield Haven NNR / SSSI and the Solent European Sites and Rights of Way will need to be assessed and should be avoided and mitigated in accordance with NPPF and local policy.

#### **Land around Welborne Garden Village**

Significant improvements to the Rights of Way networks will be required in relation to Welborne Garden Village, including upgrading of existing routes including through Fareham Common and dedication of new Bridleways from the junction of Wickham Footpath 502 and Dean Villas to Wickham Footpath 86 to include a link to Footpath 85. In the absence of improvements to PROW the development is unlikely to provide the sustainable transport, green infrastructure and countryside access links and improvements needed to avoid negative impacts and make the development sustainable in line with policy documents.

#### **Land around Swanwick station**

The nearest and only adopted highway that could provide vehicular access to the land between Swanwick Station and Lower Swanwick is Beacon Bottom. Due to the lack of road access, development proposals (site allocations) around Swanwick station and Swanwick to the south of the A27 have the potential to have a significant effect on Public Rights of Way including Fareham Footpath 18 which runs along Oslands Lane and Fareham Bridleway 17, routes which have only private vehicular rights as well as Fareham Byway Open to All Traffic 125 which passes along Glen Road.

The condition of Rights of Way network on the south side of the A27 would require significant surface improvements to routes Fareham 17, 18 or 125 and Glen Road to the North in order to accommodate

increased pedestrian and cycle use that would result from even the small-scale development being considered.

The County Council considers the allocation of larger scale development would negatively affect these Rights would be contrary to guidance provided by NPPF paragraph 98 which states public rights of way and access should be protected and enhanced with opportunities sought to provide better facilities for users, including by adding links to existing networks.

Rights of Way Circular 1/09 also states “In considering potential revisions to an existing right of way,...any alternative alignment should avoid the use of estate roads for the purpose wherever possible and preference should be given to the use of made up estate paths through landscaped or open space areas away from vehicular traffic.”

The change in use of the routes that is associated with a residential development would also mean that the perception and expectations of users would also change, and the financial burden incurred by Hampshire Countryside Service in improving and maintaining public access would increase significantly.

In addition to improvements to Fareham 17,18 and 125 if a limited number of sites for small-scale development were allocated in Land around Swanwick Station consideration should be given to formalize a route between Beacon Bottom and Botley Road and should be included in the allocation and the requirement for funding for its implementation.

Hampshire Countryside Service’s Manor Farm and River Hamble Country Park are within 2km walking distance of Land around Swanwick station. River Hamble is designated as Solent Maritime Special Area of Conservation and Manor Farm is designated as Upper Hamble Estuary and Woods SSSI. It is requested that any development proposals or future site allocations take account of impacts to existing facilities and potential for infrastructure provision at Manor Farm and River Hamble.

**Land around Burridge**

There is a network of Public Rights of Way through Swanwick Wood and Swanwick Nature Reserve SINCs which should be considered as part of any site allocation in this area. Public access and Rights of Way should be protected and where appropriate enhanced in line with NPPF and emerging local policy. The area is within 2-2.5 walking distance of Manor Farm and River Hamble Country Park. Financial obligations for improvement, enhancement and maintenance of access and green infrastructure should be secured if sites are allocated for development in this area.

Hampshire County Council Countryside Services take this opportunity to provide Fareham Borough Council with a land at Burrige and Swanwick Station Rights of Way map to support the comments above:



FBC Swanwick.pdf

**Land to the west of the Western Wards**

Hampshire Countryside Service manage a number of sites and reserves in this area including Hook with Warsash and Strawberry Field as well a footpath along the River Hamble forming part of the long-distance Solent Way walking route. Consideration should be given to the ecological sensitivity and existing use, capacity, facilities and recreational disturbance on the Countryside Sites, Solent European Sites and impacts to Rights of Way network as part of any site assessment process taking account of the need to improve infrastructure and mitigate for development to protect and enhance green infrastructure, biodiversity infrastructure and access.

## APPENDIX 3

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[Redacted]

Hi Pete

Apologies for the slow response.

In terms of the west site, one of main issues is that it currently has operational equipment located on it (on the southern part of the site). We are progressing a piece of work, subject to budget and board approvals, to look a holistic land strategy for Network Rail's land and property requirements in the Solent area. This will look at whether it is viable to relocate the operational equipment. We hope to take this workstream forward over the next 6-12 months. Until the operational issues are resolved it is difficult for us to spend money on detailed feasibility studies.

The east site is more complicated – some of the key issues set out below:

- Station car parking – without a compelling reason the quantum of parking spaces will need to be retained so we would need to look at proving a MSCP as part of a development.
- Station lease area – the station car park is within the station lease area which means the train operating company has a land interest in the site as a leaseholder.
- Freight sidings – I understand these are well utilised and I'm not sure there will be any appetite on the operational side to touch these sidings.
- 3<sup>rd</sup> party land interests – the land on the SE part of the site in in multiple 3<sup>rd</sup> party ownerships so site assembly will be required if there is to be a holistic development.

The land strategy workstream will also look at the east site – i.e. in terms of whether there is scope for a rationalisation of land uses to free up space for development, but this a longer term opportunity in our view.

I also suspect there will be financial viability issues with both sites.

Happy to discuss the opportunities in more detail once the land strategy workstream has progressed.

Kind regards

[Redacted signature]



A: 1 Eversholt Street, London NW1 2DN

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T: [@Spotlight\\_NR](#)

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

Planning Strategy & Regeneration Team  
Fareham Borough Council  
01329 824601



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## APPENDIX 4

**Our Reference: 174.0005/140222/KH**



14<sup>th</sup> February 2022

Lynne Evans

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Dear Lynne

### **Response to Fareham Local Plan Sites FTC3, FTC4 and HA55**

Following your enquiry, we have taken the opportunity to review the three requested sites included within the Fareham Local Plan and our observations are outlined below.

#### **Background Information**

SYSTRA, in 2019, were commissioned by Fareham Borough Council (FBC) to apply Solent Transport's Sub-Regional Transport Model (SRTM) to help inform the update to Fareham's Local Plan. The SRTM has been used to model the proposed land allocations and identify key transport implications resulting from the scale and location of the allocations. Solent Transport's SRTM has been utilised to test three scenarios to help inform the development and appraisal of the update to Fareham's Local Plan:

Scenario 1 – 2036 Baseline, No Fareham Local Plan development.

Scenario 2 – 2036 Do Minimum, With Fareham Local Plan development (including FTC3/FTC4/HA55), without mitigation measures.

Scenario 3 – 2036 Do Something, With Fareham Local Plan development (including FTC3/FTC4 /HA55), with mitigation measures (including improvements at The Avenue/Redlands Lane/Gudge Heath Lane signal junction).

Welborne (and its associated highway improvements), Stubbington bypass, M27 junctions 4 to 11 Smart Motorway upgrade and M27 Junction 10 improvements are included in all scenarios.

Using Systra's definitions, a 'Significant' increase in RFC (Ratio of Flow to Capacity) is where the RFC is greater than 85% and has increased by more than 5% on any approach arm.

A 'Severe' increase in RFC is defined as where the RFC is greater than 95% and has increased by more than 10%, or where delay is greater than 120 seconds and has increased by more than 60 seconds on any approach arm of a junction.

### **FTC3 – Land east of Fareham Station**

This allocation 'Land east of Fareham Station' has an indicative yield of 120 dwellings. Access will be onto Station Road which also provides access to Fareham Train Station, consideration will need to be given to the capacity of Station Roundabout.

A review of the SYSTRA report confirmed that in all 3 scenarios Station Roundabout was flagged as having a 'significant' increase in RFC which demonstrates that there is insufficient capacity at the roundabout and journey times will be impacted.

Car parking for both Fareham Railway Station and the residential dwellings will need to be provided. It is not known at this time whether there would be any reduction in the amount of parking provided for the railway station to enable the proposal (and this is unlikely to actually be confirmed until such time as any application plans may come forward). The Local Plan suggests using undercroft parking as a solution for the residential scheme which may add a substantial cost to the site and affect the viability. The practicalities of car park management would also need consideration, ensuring commuters are kept from parking in residential spaces and vice versa.

Whilst difficult to criticise the broad sustainable credentials of the site from an accessibility perspective, the most direct route from the site to Fareham Shopping Centre (along West Street), is signposted for cyclists, however for most of the route cyclists are required to ride in the busy carriageway, with limited dedicated cycle lane provision.

### **FTC4 – Land west of Fareham Station**

This allocation is for 94 dwellings indicative yield with access to be from The Avenue (A27). The site currently includes local businesses and ancillary railway operational land. It is intended the Station Quarter will provide opportunities for a mixed-use area including new residential, retail and café uses as well as potential business development. The vehicular trip generation from 94 dwellings is likely to result in an increase in vehicle trips during the AM and PM network peaks when there is the least amount of capacity available.

Currently it is possible to turn right into the site access from The Avenue, albeit not supported by a formal / standard right turn lane design which would struggle to accommodate cars or delivery vehicles to the proposed retail aspects without impacting on the traffic flow on the A27. Any increase in vehicle movements, particularly during the peak hours would result in vehicles waiting on the dual carriageway prior to The Avenue/Redlands Lane/Gudge Heath Lane signal junction. In addition to junction modelling, a Road Safety Audit would need to be carried out on this arrangement to ensure the intensification of use does not impact on highway safety.

Any vehicle egressing the site will have to turn left onto The Avenue dual carriageway, as is the current situation (enforced by a no-entry traffic regulation order). This means all egressing vehicle trips will utilise Station Roundabout, which as identified for site FTC 3 'Land East of Fareham Station' does not have sufficient capacity to operate effectively under any development scenario.

The SYSTRA report also identifies that The Avenue/Redlands Lane/Gudge Heath Lane signal junction will experience a 'severe' increase in RFC in both scenario 1 and 3 with a 'significant' increase in scenario 2. It is noted that Scenario 3 includes mitigation (adjustment to signal phasing) at The Avenue/Redlands Lane/Gudge Heath Lane signal junction, and the impact is still considered to be 'severe'.



It is recommended within the SYSTRA report that the junctions identified as experiencing significant or severe impacts be reviewed to determine if any additional mitigation is necessary, although as noted above The Avenue/Redlands Lane/Gudge Heath Lane signal junction has been included as part of Scenario 3's mitigation proposals.

On that basis, it has not been demonstrated through the Local Plan evidence that this allocation site can be delivered without residual cumulative severe impacts.

### **FTC3 – Land east of Fareham Station and FTC4 – Land west of Fareham Station**

The two developments east and west of Fareham Train Station would have an impact on Station Roundabout, which is noted as having a 'significant' increase in RFC under Scenario 1, without the Local Plan development schemes. Should the schemes' progress the current evidence base indicates an increase in delays at the roundabout, making the use of the train station potentially less desirable for commuters (who may then choose to drive rather than use the train) and potentially delaying local bus services at a key junction within central Fareham.

The Local Plan identifies that an air quality assessment would need to be provided in relation to the A27 (in accordance with Policy NE8). This would be to identify appropriate measures to mitigate NO2 emissions arising from the development. It is likely that any increase in trips would lead to an NO2 emissions increase on the A27 during peak times, which could also impact on both Fareham Station developments.

### **HA55 – Land south of Longfield Avenue**

The allocation Land south of Longfield Avenue has an indicative yield of 1250 dwellings. There is a current planning application (ref: P/20/0646/OA) which is for Outline consent with all matters reserved except for access. This application has not yet been determined and an extension of time has been granted until 31<sup>st</sup> March 2022. As part of the application a Transport Assessment has been produced and has been reviewed by Hampshire County Council (HCC) as the highway authority.

Allowing for safe pedestrian and cyclist access to public transport hubs and local amenities is vital to encouraging sustainable transport modes. It has been highlighted within the HCC response that the pedestrian/cycle route from the proposed site to Fareham Train Station is currently not suitable, with the A27/Bishopsfield Road crossing not exhibiting a pedestrian phase in the signals. Any residents wishing to access the Daedalus development (south-east of the site) by bicycle would need to ride in the carriageway along Gosport Road due to the lack of dedicated cycle infrastructure. Bishopsfield Road, north of the site, which is the most direct route to Fareham College, does not have any cycle infrastructure. Further to this the comments also note that not all pedestrian/cycle desire lines have been considered, including those across the new Stubbington bypass, to enable access to Daedalus and Stubbington.

A key consideration is that the HCC consultee response highlights that the application focuses heavily on minor improvements to the existing cycle and pedestrian network which is stated to be of a poor quality to begin with. The shared use path along Peak Lane is not proposed to see any improvements. The path is currently narrow, however there appears to be sufficient highway verge available to widen the path to meet modern standards. Emphasis is given to the LTN 1/20 guidance that the applicant would need to follow when designing their cycle

infrastructure. It is the views of the highway authority that the proposals currently do not meet the LTN 1/20 guidance.

The design of the development vehicular accesses onto Peak Lane and Longfield Avenue (both new roundabouts) have not been accepted by the highway authority. Peak Lane access is accepted in principle but is awaiting further details to be submitted to HCC, whilst the Longfield Avenue roundabout design requires further work to resolve overrunning issues.

The SYSTRA report has concluded that the Rowan Way/Peak Lane/Longfield Avenue junction is 'significantly' impacted in scenario 2 and the Longfield Avenue / Newgate Lane junction is 'severely' impacted in scenario 1 with there being a 'significant' impact within scenario 2 and 3.

As such, neither the evidence base before the Local Plan nor the live planning application have successfully demonstrated that access by all travel modes (neither sustainable nor vehicular) can be safely and suitably accommodated on the local network.

Yours sincerely



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