

**Fareham Local Plan 2037
Revised**

**Examination Statement
Matter 6
Site FTC3**

**Prepared by Lynne Evans BA
MA MRTPI MRICS, Ian
Donohue BA Hons MRTPI and
Alice Drew
BSc (Hons) MSc MRTPI**



Prepared on behalf of Raymond Brown Rookery Properties

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SOUTHERN PLANNING PRACTICE LTD

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester, SO21 1NN
Tel: 01962 715770 Fax: 01962 715880 Email: info@southernplanning.co.uk Website: www.southernplanning.co.uk
Registered in England and Wales No. 3862030

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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.