

**Fareham Local Plan 2037
Revised**

**Examination Statement
Matter 6
Site FTC4**

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Prepared on behalf of Raymond Brown Rookery Properties

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<u>Contents:</u>	Page
1.0 PREAMBLE.....	1
2.0 INTRODUCTION	2
3.0 KEY ISSUES	3
4.0 RESPONSE TO INSPECTORS QUESTIONS	7

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 west side of Fareham Railway Station with access direct from The Avenue. The site currently includes local businesses and ancillary railway operational land. There is also a TPO on part of the site (west side) adjacent to the access road.
- 2.2 The site is long and narrow and 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.
- 2.3 The site is indicated as being part of the Station quarter however no indication is provided how the two allocations east and west side of the station could be linked.
- 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 nor any indication is provided how the two allocations east and west side of the station could be linked.
- 2.5 There are fundamental questions about the suitability and achievability of this site for the intended development.
- 2.6 Access will predominantly be left in left out.

3.0 Key Issues

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 the Fareham railway 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 can't 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.

- The site is constrained being long and thin and sandwiched between a tree belt (some of which is protected and the railway line).
- The site offers no opportunity for a buffer from the noise from the railway line or from the aggregate's depot on the west side of the railway station.
- The proximity to the westbound platform could prejudice privacy.
- There would be little room for amenity space.
- 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.
- The access egress is within flood zone 2

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
-
- 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.



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: -

1. soundly based
2. based on justified and effective policy
3. 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

Our Reference: 174.0005/140222/KH



14th February 2022

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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 31st 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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