

Fareham Borough Council Publication Plan Hearing

Matter 6: - Site boundaries

Inspector's questions 3 & 4

3. Do changes to site boundaries need consequential changes to the policies map e.g., HA1 4. Is there a need for specific masterplans and design codes?

Matter 6 - Site boundaries

For the reasons already given in Matter 2, the HA1 map has already expanded many times on all sides of the site. In the 2015 extant Local Plan, around 80 dwellings were proposed for Warsash. This number gradually increased with the latest HA1 total number of dwellings reaching over 1000 which is incorrectly reported as 824 in this publication plan. This has come about because the HA1 proposal led to developers taking advantage of this by submitting additional sites claiming they form part of the proposed HA1. There has been a regular flow of sites coming forward, tagging themselves onto HA1, leading to the hugely inflated numbers of dwellings for this site.

In view of this, not only does the map need changing, another environmental impact assessment must be conducted showing the cumulative effect of HA1 in its entirety.

Matter 6 - Masterplans

Within HA1 (which is not urban but consists of greenfield sites cheek by jowl with each other) there is no inter connectivity between the sites. All Developers are working in complete isolation to one another resulting in piecemeal development and an unnecessary number of access roads. The Council have failed to implement a "Masterplan" which should have considered the wider picture. Developers are not required to consider the site next door and therefore don't. This is contrary to Design Policy D3 para 11.44 which states "Coordination of development within and adjacent to existing settlements and as part of area wide development strategies and master plans is vital to ensure that developments are sustainable, appropriately planned and designed"

The land to the South of Greenaway Lane consists of 3 parcels of land, each with separate planning applications. Originally these were owned by 2 separate developers who claimed because of this, coordination of the 3 developments could not be achieved but recently this changed, as one of the developers, Bargate Homes, now owns all three sites. An integrated plan for all three sites, could only help to manage implementation and design, minimising traffic entry and egress points which is of major concern to residents and Councillors alike. Should these sites be granted detailed planning permission, it is imperative that a well thought out deliverable Masterplan is produced.

SEA paragraph 6.14.3: "Of the sites subject to detailed assessment, North and South of Greenaway Lane, Warsash, and Southampton Road, Segensworth are expected to lead to significant positive effects because they include requirements for sports and play provision, areas of open space, and improved pedestrian/cycle access into and through the site". However, to date, there is no evidence in the documentation for any of the HA1 parcels of land of the sports and play provision coming to fruition.

Matter 6 - HA1

Inspector's questions 8,9 &11

8. This allocation consists of a number of smaller sites which are the subject of separate planning applications. How will implementation be managed, how is it envisaged that the site will be phased and how would a high- quality comprehensive development be achieved?

9. How has the limited capacity of the local sewage infrastructure been considered? Should the occupation of the site be phased?

11.What are the infrastructure needs of the proposal and how will they be provided?

Matter 6 Housing Allocations, Site boundaries and Masterplans statements equally applies to this section.

The total new homes proposed for specific sites across the Borough (not including Welborne) to 2037 of 6984 is an unfair distribution for Warsash (proposed at over 1000 dwellings) to contribute 14% of this quantum, with HA1 alone contributing 12%.

SEA Page 31: Reasons for rejection of strategic alternative sites, referring to Greenaway Lane cluster (HA1): *Disproportionate distribution of development across Borough; majority of greenfield development focused in just Warsash and Portchester*" but the site was still selected.

Implementation

Residents of Warsash have submitted many comments to the Council regarding safety and traffic concerns over a recent 1 house development on Brook Lane that led to around 40 contractor's vehicles parked on 1 of the 2 main roads into Warsash. Whilst this particular development is now complete, this instance showed the importance of a robust implementation plan throughout the lifetime of the construction phase/s.

The development of land adjacent to 125 Greenaway Lane was granted outline permission including access onto Greenaway Lane. Despite this being contrary to the preferred access being onto Brook Lane with access only for dwellings fronting Greenaway Lane and for access limited to a total of 6 dwellings onto Greenaway Lane in the adopted 2015 plan, access onto Greenaway Lane for all 81 dwellings was approved. No consideration was given to whether the residential access was also suitable for the necessary construction traffic for this site. As a result it was discovered that access for construction vehicles was <u>not</u> possible and would simply not be able to negotiate properties on this narrow lane to use the approved residential access. So, a separate construction access was applied for and granted. Residents have concerns that all construction vehicles and contractors working on that development are also provided with sufficient parking from conception through to completion. This is essential for safety reasons as Greenaway Lane is not only a narrow lane without pavements but used by many residents for walking, cycling and other activities.

In order to understand how such a fundamental issue can be overlooked when granting planning permission, a lengthy email exchange with FBC's Head of Development Management took place. I include a summary as follows:

Resident: "The outline application for this site (land adjacent to 125 Greenaway Lane (P/19/0402)) did not consider construction traffic in any great detail, if at all, leading to Planning committee members question how this was granted when the subsequent planning application for construction access (P/21/0770/FP (approved 14/10/2021)) was being considered. Your response to the question 'please advise where the construction traffic was considered and what those considerations were' was that 'Members of the Planning Committee are not required to debate each and every planning issue at the Planning Committee meeting'. The implication that construction traffic is not worthy of a discussion is staggering if indeed that is what you are implying?

Five of the 9 Committee members had the following to say about the outline application (made at the construction access application (P/21/0770/FP) in relation to both residential and construction accesses as follows:

Councillor Ford: Greenaway Lane is not a suitable access for the site

Councillor Price: Never wanted access off Greenaway Lane

Councillor Cartwright: Members are between a rock and a hard place, with their arm up their back Councillor Hockley: I wish members had put a bit more thought into the original scheme

Councillor Bull: As a HGV license holder, I would say that access would be almost impossible (referring to construction traffic accessing the site via the original planned access via P/19/0402/OA).

The above comments refer to site access for construction traffic and residential traffic, but the KEY POINT is that construction traffic was not considered.

I repeat my earlier comments that the applicant's Transport Assessment dated the 11^{th of} April 2019 specifically for P/19/0402/OA only assesses 7.5 T box vehicles(swept path analysis) **but does not mention** access for construction vehicles at all and no consideration is given to staff and contractors parking!

The Council must ensure that the developer provides sufficient car parking for all of its staff and contractors as this development will likely run for 2 years, and probably with additional developments south of this site"

To date no such assurances have been provided and the Council have been dismissive of resident's requests in relation to plant contractor parking, showing a disregard for practical implementation measures to minimise disruption for the local community.

Sewage infrastructure

Southern Water is responsible for the water supply on the South Coast covering Fareham and one of the worst offenders of pollution of all the water companies. On the 9th July 2021, they were fined a record £90m after bosses admitted deliberately dumping billions of litres of raw sewage illegally thousands of times over a five-year period into the sea.

The wastewater plant that serves Fareham is Peel Common. This is operating at near capacity and to add a significant load with massive investment to significantly increase the capacity, the waste water works will continue to pollute our waterways and will not improve the status of them as required by the HRA.

Southern Waters own 'Problem Characterisation Peel Common (PEEL)' dated august 2021 classifies the treatment work for investment strategy as IMPROVE. This means that SW consider that the current performance of the drainage and wastewater system needs to be improved to reduce the impacts on our customers and/or the environment. SW will plan investment to reduce the current risks by actively looking to invest capital funding in the short term to address current performance issues (and consider future risks when implementing improvements). However, there are no details available where this investment comes from and what the implementation timeframes are and how this relates to the Local Plan and its implementation timeframe.

How will FBC and Southern Water improve the water quality as required by Policy D4 given all of the above issues without any improvements to the water treatments works and any phasing of the developments across the Borough?

This fails the NPPF presumption in favour of development as it fails to promote a sustainable pattern of development that aligns growth and infrastructure, in this case the treatment of water, which will lead to continued deterioration of the environment by failing to improve the status of our rivers and seas and thus failing protect and enhance our natural, built and historic environment

Infrastructure needs of HA1

In the revised local plan page 54 states for HA1:

Infrastructure provision and contributions including but not limited to health, education and transport shall be provided in line with Policy TIN4 and NE3. In addition, the following site-specific infrastructure will be required:

- i. Two junior football pitches on-site; and
- ii. Off-site improvements to existing sports facilities

To date there is no evidence in the documentation for any of the HA1 parcels of land of these coming to fruition.

Page 36 - 40/69 to of the SEA Detailed Assessment Matrix sets out the key development quanta.

SEA Spatial context Page 6. Warsash, Hill Head, Fareham East and Fareham North are the locations which tend to have the longest travel times to key services.