
Fareham Local Plan Part 2: Development Sites and Policies

Hearing Statement
On behalf of Hallam Land Management Ltd

Issue 3:
The Natural Environment

October 2014

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| Checked by: | RS | RS | RS |

The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

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ISSUE 3: THE NATURAL ENVIRONMENT (DSP7 – DSP16)

This statement is submitted to the Examination into the Fareham Local Plan Part 2: Development Sites and Policies (LP2) (June 2014) ('the Examination') on behalf of Hallam Land Management Ltd (HLM). This statement refers to the following Issue:

- Issue 3: The Natural Environment (DSP7 – DSP16)

3.4 Is the evidence in the Greenspace Study sufficiently up to date and accurate? Is it not clear in paragraph 4.22 what the open space deficiency in the borough is, or whether two open space allocations will meet that deficiency. Should greater clarity be provided?

Is the evidence in the Greenspace Study sufficiently up to date and accurate?

The Fareham Borough Green Space Study ('the Study') was published in May 2007, over 7 years ago. We note that an Addendum was produced by the Council in 2010 (referred to by the Council as 'Addendum 1') which provided a quantitative update of parks and amenity open space, and natural greenspace provision in the Borough. A second Addendum ('Addendum 2') was published in January 2014. The main changes summarised within Addenda 1 and 2 are set out at paragraphs 4 and 5 of Addendum 2: in general terms they relate to the deletion of some areas of open space from the data because they serve Gosport and are not easily accessible to Fareham or Stubbington; the omission of sites with restricted access; the reclassification/categorisation of some areas and the consideration of open space by ward area, which is a departure from the approach set out in the original Study and the first Addendum.

In terms of whether the evidence in the Study is up to date and accurate, clearly the findings of the original study, now some 7 years old, are patently not, and in themselves are not considered to constitute a robust and credible evidence base upon which the Plan should be based. The production of addenda in 2010 and 2014 does of course provide some reassurance that the Council has taken steps to rightly renew the Study and to ensure that it does represent an accurate summation of the current position on the ground, however the paper trail created by the various addenda and the original study along with the change in methodology is not helpful and does lead, in our view, to some confusion regarding the actual level - both quantitative and qualitative - of the open space deficiency across the Borough. What is clear however is that while the Borough is considered by the Council to be 'relatively well served'¹ there are

¹ Paragraph 16, Addendum 2 to Fareham Borough Greenspaces Study (January 2014)

'deficiencies in open space accessibility'. This is said to stem in part from the existence of physical barriers such as busy roads, rivers and railway lines.

Is it not clear in paragraph 4.22 what the open space deficiency in the borough is, or whether two open space allocations will meet that deficiency.

Paragraph 4.22 of LP2 refers to paragraph 73 of the National Planning Policy Framework ('the Framework') and notes that it requires local planning authorities to ensure that sufficient open space is provided to meet the needs of communities. It goes on to explain that the Study and the Addenda provide an audit of open space provision across the Borough, which is considered against the open space standards set out in the Core Strategy (CS) to highlight areas in the Borough which are either in deficit or surplus of open space provision. Paragraph 4.22 then states that in order to address these deficiencies, two new publicly accessible open spaces have been allocated (land between the M27 and Kiln Road and within the development proposals at the former Coldeast Hospital site).

In response to the Inspector's specific question regarding the clarity of paragraph 4.22, our view is that the text is in no way clear with regard to the level of open space deficiency. This needs to be specified and a more coherent explanation provided as to the extent of the overall deficiency. The text *infers* that the two allocations will meet an identified deficiency however the use of the term 'address' gives rise to questions as to whether this in whole or in part. Again, revisions to the text are considered necessary.

In terms of the level of open space deficiency, the original Study concludes that there are limited opportunities to develop new natural greenspaces within the settlement, an assertion which is unfounded when considered in the context of HLM's proposals on their site at Newlands, Land South of Longfield Avenue. Our statement for Issue 7 considers the proposals and site specifics in greater detail, however in the context of question 3.4 and in particular the issue of open space deficiency within the Borough, we would note that HLM's current proposals at Newlands provide for up to 80.6ha of Green Infrastructure (GI), comprising SuDS, an adventure play area, allotment gardens, structural woodland planting, playing fields and a patently sustainable site. We note that paragraph 4.25 of LP2 identifies a particular shortfall in open space provision at Stubbington, and that this is 'largely' being addressed by one hectare of new allotment provision (including a community orchard) and fourteen hectares of natural greenspace as part of the development at Daedalus Airfield – we would make the point that one of the primary benefits of HLM's proposals at Newlands is the provision of more accessible, useable open space for residents of both Fareham and Stubbington.

Further comment regarding the principle of releasing the Newlands site for development, the appropriateness and justification for doing so is set out within our statements for Issue 7.