

Fareham Borough Council Draft Local Plan 2036 Consultation response

Section 1. Contact Details

Infrastructure provider:	[REDACTED]
Infrastructure type:	[REDACTED]
Main contact:	[REDACTED]
Telephone:	[REDACTED]
E-mail:	[REDACTED]

Section 2. Current infrastructure capacity / deficit

Settlement	Housing Allocations	Description	Location	Capacity surplus	Capacity Deficit	Required works to address deficit	Priority* (see notes) (Critical/Important or desirable)	Evidence document
Fareham Borough Various locations	HA20 Wallington & Standard way 21 dwellings HA16 Mikilitary Rd 27 Dwellings HA8 Pinks Hill 80 Dwellings HA21, HA 22, HA24 39 dwellings (various)	Provision of 2, 3 &4 yr old childcare places	Wallington Wallington Wallington Fareham Various	None	These are small developments in dispersed locations any generated dmand can most likely be accommodated locally but at a stretch.	Use of commuinity facilities should be made available to providers seeking to establish a business.	Important	HCC Services for Young Children paper 'Early Years requirements in major new developments'
Fareham Town Centre Allocation	FTC1 - FTC10 Inclusive 577 dwellings in total	Provision of 2, 3 &4 yr old childcare places	Fareham Town Centre	None	The plan does not indicate the provision of childcare facilities. Depending on the housing mix and age demographic of the residents, upto 54 30 hour childcare places for age 2-4 yr olds could be needed.	Current capacity is tight in view of initial 30 hour modelling with no capacity for additional housing growth. Community facilities will be needed to provide sessional care whilst it is likely an early years provider will require a D1 unse building with suitable parking to operate a nursery.	Important	HCC Services for Young Children paper 'Early Years requirements in major new developments'

Portchester Allocations	HA4 -Downend Rd East 350 dwellings HA5 Romsey Avenue 207 Dwellings HA6 Cranleigh Rd 120 Dwellings HA12 Moraunt Drive 49 Dwellings 726 Dwellings in total	Provision of 2, 3 &4 yr old childcare places	Portchester	None	There is currently a circa 44 place deficit in childcare places in Portchester despite a new 24 place setting opening in Easter 2017. With these allocations a further 70 places are likely to be required to meet demand for 2-4 yr old places and to meet 30 hour demand.	The respective development allocations within the draft llocal plan require proposals to address these needs either directly or by way of a financial contribution. These places are essential, to meet the needs of working families.	Critical	HCC Services for Young Children paper 'Early Years requirements in major new developments'
Stubbington & Hill Head Allocations	HA23 Stubbington Lane 12 Dwellings HA25 Sea Lane 8 Dwellings 20 Dwellings in total	Provision of 2, 3 &4 yr old childcare places	Stubbington and Hill Head	None	5 Place current deficit, but in isolation these sites are not significant for likley childcare demand.	Capacity is tight in view of initial 30 hour modelling with no capacity for additional housing growth	Desireable	HCC Services for Young Children paper 'Early Years requirements in major new developments'
Titchfield & Funtley Allocation	HA3 Southampton Rd 400 Dwellings HA13 Hunts Pond Rd 38 Dwellings HA19 Hunts Pond Rd 22 Dwellings HA10 Funtley Rd South 55 Dwellings HA18 Funtley Rd North 23 Dwellings Total dwellings for these allocations 488 Dwellings	Provision of 2, 3 &4 yr old childcare places	Titchfield Common Titchfield Common Titchfield Common Funtley Funtley	None	Whilst a new provision opening in Titchfield Community Centre and Segensworth early in 2017 there is no spare capacity in these areas. Proposed development is anticipated to generate demand for upto 44 30 hour places for 3 and 4 year olds and places for 2 yr olds.	The respective development allocations within the draft llocal plan require proposals to address these needs either directly or by way of a financial contribution. These places are essential, to meet the needs of working families.	Critical	HCC Services for Young Children paper 'Early Years requirements in major new developments'
Western Wards Allocations	HA1 Greenaway Lane 700 Dwellings HA7 Warsash Maritime Academy 100 Dwellings HA9 Heath Rd 71 Dwellings HA11 Reley Rd 49 Dwellings HA14 Genesis Centre 35 Dwellings HA15 Beacon Bottom West 30 Dwellings HA26 Beacon Bottom East 5 Dwellings HA17 Botley Rd 24 dwellings 1014 Dwellings in Total	Provision of 2, 3 &4 yr old childcare places	Warsash Warsash Locks Heath Locks Heath Locks Heath Park Gate Park Gate Park Gate	None	There is no capacity for additional housing growth with anecdotal feedback that there is a shortage of wrap around care. 30 hours demand is putting additional pressure on already stretched market capacity. The proposed developments will create an anticipated demand for upto 90 30 hour plces for 3 and 4 yr olds an 2 year funded places.	The respective development allocations within the draft llocal plan require proposals to address these needs either directly or by way of a financial contribution. These places are essential, to meet the needs of working families.	Critical	HCC Services for Young Children paper 'Early Years requirements in major new developments'

Peel Common	HA2 Newgate Lane South 475 Dwellings	Provision of 2, 3 & 4 yr old childcare places	Peel Common	None	There is insufficient capacity in this area together with adjoining Lee On the Solent which whilst not in Fareham borough influences this area. The proposal will generate demand for upto 40 childcare places	The respective development allocations within the draft local plan require proposals to address these needs either directly or by way of a financial contribution. These places are essential, to meet the needs of	Critical	HCC Services for Young Children paper 'Early Years requirements in major new developments'
-------------	-----------------------------------------	--------------------------------------------------	-------------	------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	--------------------------------------------------------------------------------------------

**Section 4. Provision requirement eq. per dwelling**

Infrastructure	Requirement per dwelling or per capita	Requirement per capita	Evidence document
New Childcare Provision	Requirement per 1000 dwellings	82 30 hour places will be required for early years provision for each 1000 dwelling houses per area.	HCC Services for Young Children paper 'Early Years requirements in major new developments'

**Notes.**

**\*Infrastructure priority**

<b>Critical</b>	Infrastructure projects which are critical to the provision of basic services.
<b>Important</b>	Infrastructure projects which are not critical but would be important to maintaining the provision of current services.
<b>Desirable</b>	Infrastructure projects which would improve/optimize existing provision but are not essential for the delivery of basic services.

## Early Years requirements in major new developments

This document provides guidance for Hampshire County Council and other agencies in determining a requirement for early years and childcare places to support new housing developments.

### 1. Demand for places:

The starting point is to calculate the number of children in each age group expected from the new housing. The Hampshire Home Movers survey has indicated a factor of 0.3 children per new dwelling and this is adopted for consideration of early years demand. There are five age groups for early years and childcare (< 1 years; <2 years; <3 years; <4 years; <5 years), therefore the average number for each individual age group is  $0.3/5 = 0.06$ . This can be considered the “cohort size”.

Estimator for number of Early Education places in new housing developments.							New Policy due 2017
Number of New Homes	no houses x 0.3*	2 year olds (20% of cohort)	3 year olds (93% of cohort)	4 year olds (32% of cohort)	All EYE Age Groups	Estimated EYE Hours required 570 hrs (15 hrs)	Estimated EYE Hours required 1140 hrs (30 hrs)
100	30	2	6	2	10	4,617	9,234
500	150	6	28	10	44	23,085	46,170
800	240	10	45	15	70	36,936	73,872
1,000	300	12	56	20	88	46170	92,340
3,000	900	36	167	58	261	138,510	277,020
5,000	1,500	60	279	96	435	230,850	461,700

\* based on Hampshire Home Movers Survey and 5 cohort ages <1 years; <2 years;<3 years; <4 years; <5 years

Early Years Education (EYE) is a statutory offer which is available universally to all 3 and 4 year olds. For two year olds, the offer is limited to children of families who meet low income criteria. In Hampshire, children can start their free entitlement in the term after their second/third and fourth birthday and can receive a maximum of 570 hours per child’s eligibility year. In June 2015 the Government indicated that it intends to increase the offer to 1140 hours for working parents from 2017. The Childcare Bill will confirm this.

From September 2013, there has been no requirement for the EYE hours to be limited to the school academic year, offering parents the flexibility to take up their hours across the number of weeks that the provision is open. The free hours can also be stretched across more than 38 weeks.

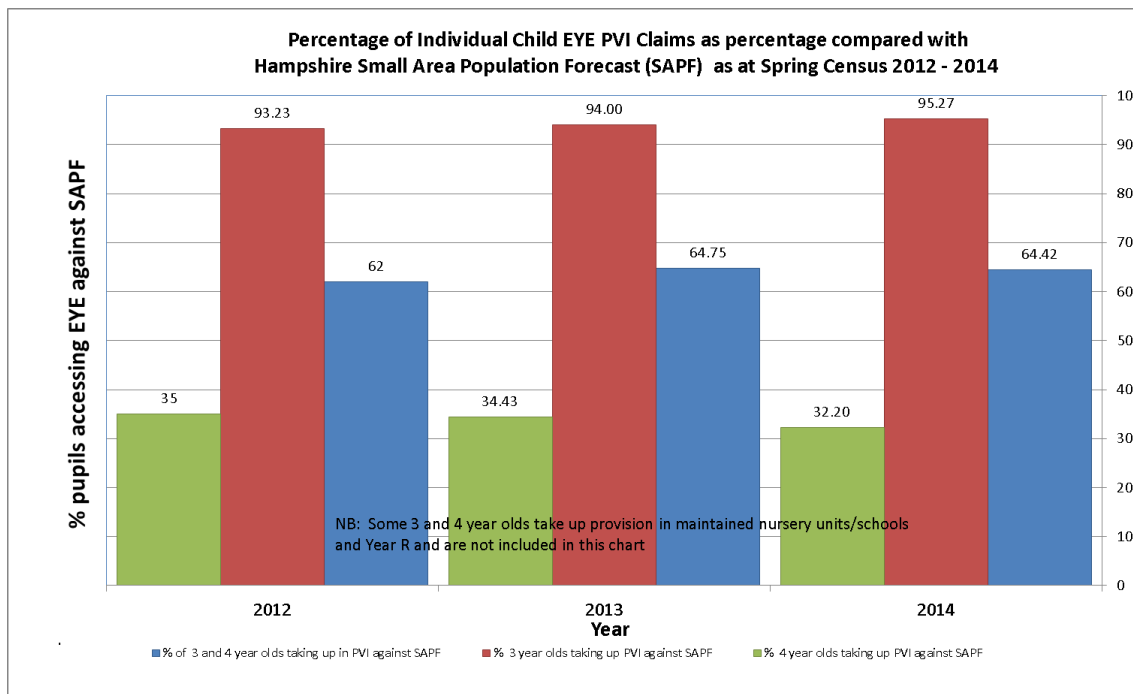
The demand for three year old places is high and trend data in Hampshire indicates that in the region of 90-95% of the three year old population take up this entitlement.

It is, therefore, expected that there will be continued high demand from this age group within any new housing development.

The demand for four year old places, prior to their starting school, is also high. However, due to four year olds taking up their school place, often in the September after their fourth birthday, the demand within the pre-school and nursery sector is in the region of 32-36% of the four year old population.

The demand for two year olds continues to grow with 4,000 children likely to be eligible for this statutory offer for families who meet certain low income level criteria outlined in section 2 below.

The graph below indicates the actual take-up from 2012 based against Small Area Population Forecasts for the same years and outlines the trend that children have consistently accessed their early years education within Hampshire. It is expected this will continue.



## 2. Low income families

Where housing developments include a significant level of social housing, shared ownership schemes and/or dwellings that would attract low income families, developers and planners should consider accessibility to affordable early years education and childcare.

Developers and planners should be aware that, from September 2014, the provision of free early years education to eligible 2 year olds became a statutory offer. The offer will provide the same choices for parents as the free early years education entitlement for 3 and 4 year olds. The exception is that the eligibility will primarily be based on income assessment.

The eligibility for 2 year old funding is:

Children **must** meet either criterion A, B or C to be eligible for funding.

**Criterion A – Economic:** Children whose parents/carers are in receipt of one or more of the following benefits:

- [Income Support](#)
- Income based [Job Seekers Allowance](#)
- Income-related [Employment and Support Allowance](#)
- Support under Part 6 (VI) of the [Immigration and Asylum Act 1999](#)
- The guaranteed element of State [Pension Credit](#)
- [Child Tax Credit](#) and have an annual gross household income of no more than £16,190 as assessed by Her Majesty's Revenue and Customs
- [Working Tax Credit](#) and have an annual household gross income of no more than £16,190, as assessed by Her Majesty's Revenue and Customs
- Working Tax Credit 4 week run on (the payment you get when you stop qualifying for Working Tax Credit)

**Criterion B – Children looked after by the Local Authority:**

- Child in Care
- Child Leaving Care in Special Guardianship, adoption or child arrangements order (previously residence order)

N.B. Details of a Social Worker able to verify the above information is required.

**Criterion C – Child with Special Educational Needs and/or Disability as defined by:**

- Children in receipt of [Disability Living Allowance](#) (DLA)
- Child with a [Statement of Special Educational Needs](#) (SEN)
- Child with an [Education, Health and Care Plan](#) (EHC Plan)

### 3. Space requirements and regulations

The space required to fulfil these requirements is stipulated within the [Statutory Early Years Foundation Stage](#)<sup>1</sup>

Section 3.57 sets out premises requirements and states, the premises and equipment must be organised in a way that meets the needs of children. In registered provision, providers must meet the following indoor space requirements:

- Children under two years: 3.5 m<sup>2</sup> per child.
- Two year olds: 2.5 m<sup>2</sup> per child.
- Children aged three to five years: 2.3 m<sup>2</sup> per child.

---

<sup>1</sup> Statutory Early Years Foundation Stage 2014

These calculations should be based on the net or useable areas of the rooms used by the children, not including storage areas, thoroughfares, dedicated staff areas, cloakrooms, utility rooms, kitchens and toilets.

All early years and childcare operators must register with Ofsted as the regulatory body. Ofsted will inspect an organisation's ability to meet expected standards covered within the Early Years Foundation Stage. The Early Years Foundation Stage also contains expected minimum requirements for the suitability of premises which can be found within the same statutory framework document (accessed through the link on page 3). It is expected that all early years and childcare providers are able to meet requirements to deliver the free early years entitlement at the highest quality and Hampshire providers are expected to achieve and maintain "good" and "outstanding" inspection results.

#### **4. What developers should provide**

Developers should consider 80 early years places for every 1,000 houses and that these places are offered through a mix of facilities where possible. The childcare planning should allow for flexible hours of opening and covering at least 7am to 7pm for full day care.

For 1,000 houses, it is anticipated that one full day provision of 50+ places, together with an additional 30 places from shared community premises, would meet the needs of this size of development.

Where developments provide a high number of social housing dwellings, it is considered there will be the potential for greater demand for affordable childcare and access for two year old funded provision. It is likely that this childcare will be required to support employment activities and, therefore, any provision to support lower income families should have regard to the flexibility of opening and closing times of childcare to meet the employment or return to learning requirements of parents and carers.

Through childcare sufficiency assessments (2008, 2011), parents prefer the early years and childcare facilities to fall within a 1-2 mile radius of their homes.

It is also known through the Early Years Census 2013 that there were approximately 50% of the small area population of two year olds taking up some childcare which is not part of early years free entitlement.

The childcare market has also seen parents preferring provision that is close to, or on the site of, infant or primary schools where the school site is large enough to accommodate the provision.

#### **5. Timing of the early years and childcare development**

There must be early consideration of the allocation of the sites and/or premises for early years and childcare. It is recommended that such provision is considered for development and occupation at the same time as that for primary schools. This is especially important within developments that have little or no accessible early years and childcare provision adjacent to the new housing development.

The impact of a new housing development, alongside current capacity in the early years and childcare market, should also be considered in terms of early occupation

of families and their ability to access provision and whether any interim measures are put in place prior to thresholds of dwellings occupied being reached.

## **6. How this should be provided**

Recent practice suggests to planners / developers that provision should be made for early years and childcare facilities for children 0- 5 years within their plans for the housing developments. Childcare facilities should either be associated within / alongside community facilities or in a dedicated space identified and available for development. In either case, it is suggested that there are advantages with locating adjacent to, or combined with, primary school sites.

For dedicated nursery/childcare facilities, we suggest an area of 0.25 hectares. For combined school / pre-school sites this can be reduced to 0.2 hectares as there can be economies with a more flexible site layout when both are planned together. These site areas are estimates that the Council has used in other recently provided facilities, but will need to be tested against the draft accommodation briefs.

It is assumed that the sites would be made available through an open and transparent process to interested early years and childcare providers; or through the district councils and community associations where it is expected that childcare will be operated within community facilities.

The location of any provision must enable good access for walking as well as having good public transport and motor-vehicle transport links and be within a 1-2 mile radius of the main housing development.

It should be noted that early years and childcare provisions of 50+ places are considered more economically viable and may attract the best investment opportunity from the sector.

It is also a requirement that a childcare operator that is seeking to accommodate children for free early years education makes an application to Hampshire County Council prior to opening their provision. Any developer who has engaged a childcare establishment to deliver or take up opportunity on their site should ensure the childcare provider contacts the Council at: 01962 847070 or email [childcare@hants.gov.uk](mailto:childcare@hants.gov.uk)

## **7. Contact**

Hampshire County Council's Children's Services can be contacted to discuss any support requirement in selection of appropriate high quality early years and childcare providers or any aspects of the regulation and legislation requirements.

The childcare and early years education development team can be contacted on 01962 847070 or [childcare@hants.gov.uk](mailto:childcare@hants.gov.uk)

Links to documents that may support design of childcare buildings:

<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/sure-start-every-building-matters.pdf>





Economy, Transport and Environment Department  
Elizabeth II Court West, The Castle  
Winchester, Hampshire SO23 8UD

Tel: 0845 603 5638 (General Enquiries)  
0845 603 5633 (Roads and Transport)  
0845 603 5634 (Recycling Waste & Planning)  
Textphone 0845 603 5625  
Fax 01962 847055  
www.hants.gov.uk

[Redacted]

Enquiries to

[Redacted]

My reference

PLAN/PD/FAREHAMLP

Direct Line

Your reference

Date

08/12/2017

Email

[Redacted]

[Redacted]

## Fareham Borough Council Draft Local Plan 2036

Thank you for providing Hampshire County Council with an opportunity to comment on the emerging draft Local Plan for the Borough.

Please find attached to this letter the comments on behalf of Hampshire County Council as Local Highway Authority, Lead Local Flood Authority, Minerals and Waste Authority, Local Education Authority, Public Health, and Countryside Services. Please note that comments on behalf of the County Council as landowner have been submitted separately.

I would like to draw to your attention that as Highways Authority, the County Council is lodging two objections to the draft Plan. Firstly a holding objection to the local plan until such time as the Local Plan Transport Assessment has been finalised and the strategic transport impacts of the proposed allocations have been adequately assessed with evidence that any significant impacts can be adequately mitigated. Secondly, the Highways Authority raises an objection to Policy HA2 – Newgate Lane South.

If you have any queries regarding any of the above, please don't hesitate to contact me.

Yours Sincerely

[Redacted Signature]

Director of Economy, Transport and Environment  
Stuart Jarvis BSc DipTP FCIHT MRTPI

Fareham Borough Council draft Local Plan 2036	
HCC Response – December 2017	
Paragraph / Policy Number	Comments (Including Proposed Changes / Amendments)
Introduction	<p>Consider including data on health and wellbeing of the residents of Fareham to set the context. Data available through Public Health England Health Profiles:  <a href="https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/101/are/E07000087">https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/101/are/E07000087</a></p>
Vision and Key Strategic Priorities	<p>We welcome the inclusion of strategic priority 7 around creating places that encourage healthy lifestyles. However, we would like to see this priority running more strongly as a thread throughout the Local Plan which could be achieved by translating it into a Strategic Policy on health and wellbeing. For example:</p> <p><b>Health and wellbeing</b></p> <p>The Council and its partners will create and safeguard opportunities for healthy, fulfilling and active lifestyles by:</p> <ul style="list-style-type: none"> <li>a. Working in partnership with the health authorities to improve health in Fareham;</li> <li>a. Ensuring new developments provide opportunity for healthy living by the encouragement of walking and cycling, good housing design, sufficient open space and opportunity for recreation and sound safety standards;</li> <li>b. Improving education and skills training in Fareham and encouraging life-long learning; and</li> <li>c. Promoting the growth and expansion of further and higher education to improve skills and act as a driver of growth and enterprise in the local economy.</li> </ul> <p>We also welcome the emphasis on the needs of an ageing population in priority 8.</p>
SP6: Development in Strategic Gaps	<p>The existing Policy CS22 – Development in Strategic Gaps, of the Adopted Core Strategy (2011) identifies a Strategic Gap between Stubbington/Lee on Solent and Fareham/Gosport to help define and maintain the separate identity of individual settlements. Proposed Policy SP6 of the Draft Plan maintains a Strategic Gap policy in this location as well as the express purpose of helping to prevent coalescence of separate settlements and helps maintain distinct community identities, yet excludes site HA2 from this policy.</p> <p>The Local Planning Authority would need to satisfy itself that excluding the proposed site HA2 from the designated strategic gap is not detrimental to the integrity of the gap, leading to the coalescence of the Fareham and Stubbington settlements, and harmful to the overall purpose of the Strategic Gap policy.</p>

H2: Provision of affordable housing	Public Health supports the Borough's intention to provide affordable housing as this can contribute to efforts to tackle health inequalities, as long as affordability criteria are not set too high. We note, however, that the requirement for 30% affordable housing on large sites is lower than the 40% in the existing Local Plan. We would encourage the Local Planning Authority to maintain the 40% requirement on strategic sites.
H4: Adaptable and Accessible Dwellings	As mentioned in the draft Local Plan, the ageing population is a significant issue in Fareham as it is nationally. It would be useful to give consideration to forecasts of the older population in the Borough in addition to just using the 2011 Census figures as in para 5.31. For instance, the latest HCC Small Area Population Forecasts show that by 2023 a quarter of the population will be aged over 65. Therefore, whilst Public Health supports the requirement to build 15% of new homes to Category 2 Standards, we would suggest that the council should be more ambitious and set a higher percentage in order to secure more lifetime homes for the population.
H8: Houses in Multiple Occupation	Public Health welcome the provision for secure and easily accessible cycle parking/storage mentioned throughout the draft Local Plan. However, we want to be sure that this will apply to all new developments including, for example, the creation of HMOs where currently cycle parking provision is not explicitly mentioned.
R3: Other Changes in the Centres or Small Parades	<p>Para. 7.17 highlights the potential issues of hot food takeaway outlets but fails to mention the negative impact of such outlets on the food environment and potentially on health outcomes such as obesity. As already noted, Fareham has a higher than average rate of overweight and obese adults.</p> <p>Obesity is the outcome of a complex web of social, cultural, environmental, biological and psychological influences. Therefore, no single intervention will resolve the obesity issue. Instead we need a range of actions across the whole system – restriction of hot food takeaways is one part of the jigsaw. Maps on the number and rate of hot food takeaways is available and could be used to inform a policy on restricting such outlets. Public health recommends consideration of a policy to restrict new hot food takeaways.</p>
Policy CF3: Loss of a Community Facility	<p>In response to on-going constraints on central government grant funding, it is expected that an even greater reliance will be placed on Hampshire County Council and other public sector providers to deliver service improvements through reinvesting the proceeds of sale from rationalised and/or surplus property assets which no longer meet the needs of existing and future users. This is in order to continue to deliver service improvements that are more appropriate to the evolving needs of the community.</p> <p>In order to be effective, Draft Policy CF3 needs to provide the necessary flexibility to respond to the changing needs of public services providers to continue to ways of providing for such services, including the loss of a facility no longer needed. On this basis, the current draft Policy CF3 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</p>

	<p>unhelpful to public service providers such as the County Council.</p> <p>The “loss” of any County Council facility is preceded by a considered assessment that, where it provides a statutory public service, includes an alternative provision strategy that will satisfy criteria (a), (b) and (c) of the draft Policy.</p> <p>However, in some instances there is no alternative provider of a public service that is accommodated in a facility that has become unsuitable for its purpose. In others, the built facility can be so specific to a particular service that is impractical to adapt it to an alternative community use. In such instances, and where the sale of a surplus facility is part of the County Council’s ongoing reinvestment strategy, requiring a twelve month marketing exercise can impose an unhelpful and unnecessary delay in securing much-needed funding for public services.</p> <p>In order for Policy CF3 to be sound, it is recommended that it is amended to distinguish between commercially-run and publicly-owned or managed community facilities. It is suggested that emerging Policy CF3 should adopt a similar approach to that of below:</p> <p><i>New and Existing Community Facilities:</i></p> <ol style="list-style-type: none"> <li>1. <i>Development proposals for new and/or expanded community facility infrastructure will be permitted where:</i> <ol style="list-style-type: none"> <li>a. <i>They demonstrate a local need;</i></li> <li>b. <i>The scale of the proposed infrastructure is proportionate to the local area;</i></li> <li>c. <i>There has been prior local community engagement;</i></li> <li>d. <i>They are accessible and inclusive to the local communities they serve; and</i></li> <li>e. <i>Appropriate consideration has been given to the shared use, re-use and/or redevelopment of existing buildings in the host community.</i></li> </ol> </li> <li>2. <i>Development proposals that would result in the loss of, or have an unacceptable adverse impact upon, an existing community facility, will not be permitted unless:</i> <ol style="list-style-type: none"> <li>a. <i>For commercially run community facilities, evidence is provided of a robust marketing campaign of at least 12 months that clearly demonstrates there is no market demand for the existing use or an equivalent community use; or</i></li> <li>b. <i>For community- or publicly-owned or managed facilities, it can be robustly demonstrated that there is a lack of need for the existing facility, or an equivalent community use, or</i></li> <li>c. <i>Alternative community facilities are provided that are accessible, inclusive and available without causing unreasonable reduction or shortfall in the local service provision.</i></li> </ol> </li> </ol>
<p>Policy CF4: Educational Facilities Outside of the Urban Area Boundaries</p>	<p>Hampshire County Council as a landowner and a public service provider support intentions of the policy in particular paragraph 8.22-8.23.</p> <p>However, with the links to Policy CF6 and in order for it to be sound, Hampshire County Council requests that the supporting text acknowledge the role of Section 77 of the School Standards and Framework Act 1998</p>

	<p>when it seeks the development of surplus school playing fields to rationalise its land holdings as a means of financing recreational and educational improvements.</p>
<p>Policies CF5: Green Infrastructure and CF6: Provision and Protection of Open Space</p>	<p>Hampshire County Council Countryside Service supports these policies which seek to protect rights of way from fragmentation and harm, unless suitable mitigation is provided.</p>
<p>Policy CF6: Provision and Protection of Open Space</p>	<p>The current wording of Policy CF6 is unsound as it not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholders plans.</p> <p>In order to be sound, Hampshire County Council requests that the supporting text acknowledge the role of Section 77 of the School Standards and Framework Act 1998 when it seeks the development of surplus school playing fields to rationalise its land holdings as a means of financing recreational and educational improvements. This is justified and effective because it goes beyond traditional land use planning and integrates policies for development and the role of organisations that influence the nature of places and how they function.</p> <p>A note acknowledging Section 77 is included in the supporting text to the corresponding policy (DM1) in the adopted Core Strategy for Havant. In addition, in the submission Sites and Development Management DPD for New Forest District Council, the following paragraph (2.30) supports Policy DM7:</p> <p><i>"In the circumstance where the Education Authority has received approval for the disposal of surplus school playing fields from the Secretary of State, in accordance with Section 77 of the Schools Standards and Framework Act 1998, an exception may be made to this policy where equivalent or greater community benefits are provided"</i>.</p> <p>The above policy wording in adopted Local Plans that have been found sound at examination is therefore a material consideration for the emerging Fareham Local Plan.</p> <p>The above wording is also effective because it is flexible to respond to a variety of, or unexpected changes, in circumstances regarding the delivery of education infrastructure.</p> <p>In order to be effective, it is strongly advised that the following is included as supporting text to Policy CF6:</p> <p><u>In the circumstance where the Education Authority has received approval for the disposal of surplus school playing fields from the Secretary of State, in accordance with Section 77 of the Schools Standards and Framework Act 1998, an exception may be made to this policy where equivalent or greater community benefits are provided</u></p>

<p>Policy D1: High Quality Design</p>	<p>Hampshire County Council as the waste disposal authority note that there is very limited mention of waste or recycling within the draft Local Plan and feel that there should be recognition of the importance of this infrastructure alongside those contained within the document. Whilst Policy D1 recognises the need for waste collection and storage locations as part of housing developments there is no link made to the need for infrastructure to process the resultant material.</p> <p>It is recognised that individual pockets of development may not have a significant impact on waste management infrastructure but when considered in terms of the development across the borough, and indeed Hampshire as a whole, the impact is significant. Waste disposal infrastructure provided by the County Council is provided on a regional basis. The existing energy recovery facility (ERF) and materials recovery facility (MRF) at Portsmouth receive material from both from Fareham and across south and east Hampshire.</p> <p>Due to increasing economic development and forecasted significant housing growth across the County, the capacity of waste collection and disposal facilities to deal with the cumulative demand for waste management services in Hampshire are projected to come under increasing pressure.</p> <p>In Hampshire, the current average household generates approximately one tonne per year, approximately two thirds of which is kerbside residual (non-recyclable) waste. Although there are ongoing efforts to reduce waste and increase recycling through the County Council's waste prevention programme, Hampshire is experiencing an increasing trend in the amount of waste per household. It should be noted that current levels of recycling in Hampshire are low with significant issues related to contamination both of recycling and residual waste streams. This in turn leads to higher levels of residual waste which places increased stress on the waste disposal infrastructure provided by HCC as the waste disposal authority. It should not, therefore, be assumed that the existing infrastructure is sufficient to deal with the waste expected to be generated in the borough going forward.</p> <p>Further to this, it is likely that the current Circular Economy package being developed by the EU, which sets ambitious targets for recycling of 65% or 75% by 2030, will be transposed into UK law prior to Brexit. In addition to the current national target of 50% by 2020, this strengthens the case for the need for investment to enable enhanced recycling by residents to improve Hampshire's current recycling rate of 38%.</p> <p>In summary, the impact of additional waste i.e. the contribution a new large development will make in terms of the cumulative impact on existing waste collection and disposal infrastructure which have a finite capacity, and the need for enhanced recycling, should be considered alongside the other infrastructure provision.</p>
-----------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



<p>Policy D1: High Quality Design</p>	<p>Hampshire County Council as a Lead Local Flood Authority (LLFA) note that the relevant 'flood' policy/supporting text in the draft Fareham Borough Local Plan is contained in Policy D1. It is suggested that the Borough Council amends the supporting text by deleting the highlighted text below from paragraph 10.13 (page 92):</p> <p><del>The Council will therefore require SuDS to be provided on all development of 10 dwellings or more and to major commercial development, unless this is practically impossible due to the nature of the site, such as some Town Centre redevelopment. Details relating to how surface water run-off will be addressed should be provided with major proposals and in some instances involving more minor schemes where surface run-off is a concern.</del></p> <p>And substitutes it with the following:</p> <p><u><i>'All planning applications for major development are required to ensure that sustainable drainage systems are used for the management of surface water unless demonstrated to be inappropriate. All new developments in areas at risk of flooding must give priority to the use of sustainable drainage systems. Details relating to how surface water run-off will be addressed should be provided, in accordance with Lead Local Flood Authority Advice, for major proposals and instances involving minor developments where surface run-off is a concern.'</i></u></p>
<p>Policy D1: High Quality Design</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services support point d) in prioritising pedestrian and cycle access.</p>
<p>Policy D3 Historic Environment</p>	<p>Paragraph 9.1 of the National Planning Policy Framework (NPPF) requires that the Local Plan sets out a positive strategy for conserving and enjoying the historic environment. This should include reference beyond the protection of heritage assets to indicate the positive role the heritage plays, and how that role can be both <u>protected and enhanced</u> and how heritage assets can be greater enjoyed by the communities as a result of implementation of planning policy.</p> <p>The County Council's Archaeologist notes that the introductory elements of the FBC draft Local Plan do recognise the contribution of the historic environment to sense of place, character and quality of Fareham, and do include within the vision the need to protect and enhance the environment, preserve all that is good, retain identity and appropriately protect heritage assets. The section on design acknowledges the contribution heritage assets make to character, quality and sense of place and the need for design to take the historic environment into account. Whilst such care and protection is welcome it might be regarded as falling short of a defining a 'positive strategy' to enhance conservation and enjoyment.</p> <p>An example of falling short of a positive strategy can be seen in the key priorities list in paragraph 2.7 (9) where the Plan seeks to 'protect and enhance' biodiversity in the Borough while in (10) it only seeks to 'manage and protect' the heritage without reference to an ambition to enhance it. Another example is Policy CF5 (Green Infrastructure) and its supporting text that discusses the role of green infrastructure. The historic environment and heritage can have a positive role within green infrastructure and green</p>

	<p>infrastructure can have a positive role in enhancing the heritage and its enjoyment. This is not acknowledged in the policy wording of Policy CF5. For example the use of open space to protect heritage assets and or their settings, the use of heritage assets within green infrastructure to promote access and enjoyment, the relationship between historically established biodiversity (such as hedgerows and green lanes) with historic landscape character. The ability to use green infrastructure to conserve and enhance access and enjoyment to heritage assets might be acknowledged within the supporting text of policy CF5 towards revealing a positive strategy towards the heritage.</p> <p>Policy D3 does refer to the need to conserve, preserve and enhance the historic environment and does note that this includes archaeological sites. However the wording of the policy thereafter appears written to acknowledge the built heritage and does not provide any connectivity with archaeological issues which might arise. For example para 10.23 which addresses archaeological sites but does not explore the role of mitigation and archaeological recording arising out of harm identified in a heritage statement and through planning policy. Hampshire County Council recommends an additional sub-clause to address archaeological recording as a mitigation strategy is added to the policy wording of Policy D3 to enhance the effectiveness of the policy. Policy D3 and its supporting text might also place greater emphasis on the presumption of preservation of significant heritage assets, and harm to national important heritage assets being 'wholly exceptional' (NPPF para 132).</p> <p>The County Council therefore recommend the addition of a sub clause as set out below:</p> <p><u>(e) Significant archaeological remains should normally be preserved, and loss or harm to nationally important archaeological remains should be wholly exceptional. Where public benefit outweighs preservation the planning authority will seek to secure mitigation by excavation, recording and public presentation of the results.</u></p> <p>These policy principles also should be explored and expanded within the supporting text.</p> <p>The Local plan, whilst acknowledging the role of the heritage assets and the need to conserve and protect, falls short of describing a positive strategy. In addition the reference to heritage is so closely aligned on the built heritage that, whilst the archaeological heritage is acknowledged, archaeological issues could usefully be more fully explored given their impact on the determination of planning applications.</p>
<p>Policy D4: Coordination of Development and Piecemeal Proposals</p>	<p>Hampshire County Council as a landowner and a public service provider support the intentions of the policy because it is effective in delivering comprehensive development.</p>



<p>Minerals and Waste Safeguarding</p> <p>HA1 HA2 HA3 HA4 HA8 HA9 HA10</p>	<p>Hampshire County Council as the Minerals and Waste Planning Authority are pleased to see that the draft Local Plan and appendices reference the adopted Hampshire Minerals and Waste plan (2013). However this seems to be only briefly mentioned in the glossary of terms and the County Council consider that this adopted planning policy needs to be adequately referenced in the draft Local Plan.</p> <p>Hampshire County Council recommend that this reference to the adopted Hampshire Minerals and Waste Plan (2013) is applied particularly in relation to a number of sites within the defined mineral safeguarded areas, these include the following sites detailed below:</p> <p><b>Impacts of Mineral and Waste safeguarding on the draft Fareham Local Plan:</b></p> <p>Sites that are likely to be underlain by sand and gravel:</p> <ul style="list-style-type: none"> <li>- HA1 North and South of Greenaway Lane</li> <li>- HA2 Newgate Lane South</li> <li>- HA3 Southampton Road</li> <li>- HA9 Heath Road</li> </ul> <p>Sites that are likely to be underlain by brick clay:</p> <ul style="list-style-type: none"> <li>- HA8 Pinks Hill</li> <li>- HA10 Funtley Road South</li> </ul> <p>Additionally, site HA4 Downend Road East is within the MWCA Safeguarded Site - Downend Quarry which operates as part of a Waste Transferring station, this will need to be considered prior to development.</p> <p><b>Policy context of mineral safeguarding:</b></p> <p>Any new development or significant redevelopments of land may impact on mineral resources. Mineral resources are necessary for a vast array of construction activities and their availability is a prerequisite for any housing development.</p> <p>Therefore, the NPPF requires planning authorities to define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, as well as set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place. The Hampshire Minerals and Waste Plan (HMWP, 2013) sets out the Minerals Safeguarding Area, which is then contained in the regularly updated Minerals and Waste Consultation Area (MWCA). The HMWP also sets out the minerals safeguarding policy for Hampshire (Policy 15 (Safeguarding – mineral resources)), while the Minerals and Waste Safeguarding Supplementary Planning Document (available here: <a href="http://www3.hants.gov.uk/mwsafeguarding.htm">http://www3.hants.gov.uk/mwsafeguarding.htm</a>) provides further guidance on the policies and their implementation. The NPPF also states that local planning authorities should not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes.</p>
<p>Infrastructure</p>	<p>The County Council welcomes the requirement for all new development to</p>

<p>Delivery and INF1</p>	<p>deliver the necessary infrastructure that is needed to serve the site and especially the acknowledgment of the role financial contributions have in securing that provision. It is noted that the Community Infrastructure Levy is the primary mechanism for contributing towards off-site strategic infrastructure. The County Council is concerned with this approach, in particular, its implications for transport and education provision. The level of CIL funding collected to date by Fareham Borough Council presents a clear and serious concern for the County Council, particularly given that the Council has received nothing towards the provision of infrastructure it provides since CIL was introduced in the Borough in 2013. The delivery of costly, off-site highways, transport and school infrastructure is expected to be funded by the developments that generate that impact. The evidence to date suggests that the likely cost of necessary infrastructure, required to mitigate any impacts of new development, will far exceed what has been collected through CIL, and that which is likely to be collected in future years.</p> <p>The County Council acknowledges that the current Regulation 123 Spending List pre-dates the current plan approach and welcomes the commitment to monitor and review the current List. The County Council would request that it is consulted on any such review and subsequent approach to ensure that the right infrastructure can be provided in the right places, at the right time. This is particularly important with regard to the approach to highway improvements, as the Local Highway Authority's ability to secure section 278 works to deliver site specific improvements may be fettered if the Regulation 123 list includes highway and transport improvements as a generic infrastructure item.</p> <p>With regards to particular educational requirements, the County Council would request that the Borough Council clarify how education infrastructure is to be funded. given that the level of new housing in the following locations may well require the provision of additional school places:</p> <ul style="list-style-type: none"> <li>• HA1 – Warsash</li> <li>• HA2 – Newgate Lane South</li> <li>• HA3 – Southampton Road, Titchfield Common</li> <li>• HA4 – Downend Road East</li> </ul> <p>The Department for Education expects developers to pay for additional school places as a result of housing growth. Hampshire County Council recommends the use of developer contributions (section 106) to be used for the provision of educational infrastructure as this allows for a contribution that is directly and reasonably related in scale and kind to the development. The preferred approach to s106 contributions is set out in the County Council's document: Developers' contributions towards Children's Services facilities:  <a href="http://documents.hants.gov.uk/education/DeveloperContributionGuidanceDocumentMay2017.docx">http://documents.hants.gov.uk/education/DeveloperContributionGuidanceDocumentMay2017.docx</a></p>
<p>INF2: Sustainable Transport System</p>	<p>Public Health would welcome the development of an Active Travel Strategy for Fareham and would be pleased to contribute to this.</p>

<p>Paragraph 11.22 / 11.23 Fareham Active Travel Strategy</p> <p>School Travel Plans Paragraph 11.32</p>	<p>Hampshire County Council take this opportunity to advise the Borough Council that close liaison will be needed with both HCC Children’s Services and Economy, Transport and Environment to support and develop in partnership the Fareham Active Travel Strategy (para 11.22). In particular reference to ‘home to school travel’ to promote sustainable travel. This should include early identification of barriers that prevent walking and cycling to school and a strategy to remove those barriers. New housing development should make a financial contribution towards ensuring that access to schools and other community facilities through walking and cycling is promoted and any necessary improvements to walking and cycling routes are to promote sustainable travel are funded and implemented through Borough and County initiatives. This is identified in para 11.23 as a principle but a strategy should be developed to ensure FBC and HCC work closely together to achieve this.</p> <p>Even if additional housing does not result in school expansions the identification of suitable walking and cycle routes to schools, together with any funded improvements that may be required, should be made. In addition funding support should be provided to enable HCC to work with local schools on school travel plans (STP’s) so new communities can be encouraged and supported to walk and cycle relying less on the car. Such financial support should be made through section 106 agreements or the use of CIL funding. Such a strategy will contribute to the improvement of air quality as identified in paragraphs 11.32 onwards.</p>
<p>Early Years Places</p>	<p>HCC Services for Young Children replied to the draft outline IDP consultation at the end of 2016 in general terms because of the non specific nature of the areas described in the IDP.</p> <p>This draft Local Plan consultation is much more specific and includes housing allocations. As such HCC Services for Young Children have adapted the original response by area and grouped the housing allocations together to provide a coherent childcare picture.</p> <p>The numbers of childcare places required represent the bare minimum number required based on the Local Authority’s statutory sufficiency duty. As such no allowance has been made for children aged 0 or 1 yr. old, although Nursery providers in the market will need to allow for these cohorts</p> <p>Please see the attached spreadsheet for the full HCC Services for Young Children response and the attached developer guide for more background detail.</p> <div style="text-align: center;">   </div> <p>Early Years Places FBC draft plan 2036 Planning document 2(consultation response</p>
<p>Policy SP7: New Residential Development in the</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way; in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request the following amendment to this policy:</p>

Countryside	In all cases, where residential development is considered acceptable, proposals should avoid the loss of significant trees, should not have an unacceptable impact on the living conditions of residents, and should not result in unacceptable environmental or ecological impacts, or detrimental impact on the character, landscape or <u>rights of way network</u> within the surrounding area.
Policy E4: Employment Development Outside of the Urban Area	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request the following amendment to this policy:  All development proposals for employment uses outside of the urban area must: i. Demonstrate that there will be no adverse impact on the environment, landscape, <u>rights of way network</u> , heritage and neighbouring uses; and
Policy E5: Boatyards	HCC Countryside Services support clause (e) within this policy.
Policy NE1: Landscape	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request the following amendment to this policy:  b) Visual setting, including to/from key views, <u>and rights of way</u>
Policy NE4: Coastal Change Management Areas (CCMAs)	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request the following amendment to this policy:  Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the relevant Shoreline Management Plan and that there will be no severe adverse impact on the environment, <u>the English Coast Path, and the rights of way network</u>
Policy H11: Development Proposals within Solent Breezes Holiday Park	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request the following amendment to this policy:  d) Where it can be demonstrated that the proposal will not have an adverse impact on the Solent and Southampton Water Special Protection Area (SPA) and the <u>rights of way network</u> .

Implementation and Monitoring	Public Health welcome the proposal to expand the number of indicators being monitored and would suggest that you incorporate some health and wellbeing indicators in order to monitor progress towards strategic policy 7. The Public Health Outcomes Framework <a href="http://www.phoutcomes.info">www.phoutcomes.info</a> provides a good source of data on a range of validated indicators and we would be happy to work with you on which indicators would be appropriate to include.
-------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Policy D1: Development Allocations</b>	<b>Hampshire County Council has comments as a public service provider regarding individual Site Allocations which are set out in sequence below:</b>
FTC1: Civic Area	<p>Hampshire County Council as a public service provider notes that the Fareham Library falls within the proposed area allocated under Policy FTC1.</p> <p>Fareham Library is a thriving library with high levels of usage, a busy café and partner space occupied by the Citizen's Advice Bureau. The building has recently been refurbished and is one of the top performing libraries in Hampshire. As such, the existing building is required operationally by the Library Service and this is unlikely to change in the foreseeable future.</p> <p>Hampshire County Council as a public service provider would support development which improves footfall in the area and introduces other community or civic uses which complement the existing library.</p>
FTC1: Civic Area / Quarter	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC Countryside Services therefore request that any development at this location should not have an adverse impact upon Fareham Footpath 94a, which runs adjacent to the site.
FTC2: Market Quay	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC have an aspiration to improve the cycle access from West Street to Fareham Train Station. The County Council therefore request that this allocation includes appropriate mitigation measures towards enhancing cycle access.
FTC 3: Fareham Station East	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC have an aspiration to improve the cycle access from West Street to Fareham Train Station. HCC have aspirations to improve cycle access to Fareham Train Station, from all directions. The County Council would therefore like to explore whether this allocation should include appropriate mitigation measures towards this aim.
FTC4: Fareham Station West	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC have an aspiration to improve the cycle access from West Street to Fareham Train Station. HCC have aspirations to improve cycle access to Fareham

	Train Station, from all directions. The County Council would therefore like to explore whether this allocation should include appropriate mitigation measures towards this aim.
FTC6: Trinity Street, Fareham Town Centre	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 95 is opposite the site. HCC therefore request that this allocation includes appropriate mitigation measures towards enhancing the local rights of way network.
Western Way (A27), Fareham Town Centre (FTC7), West Street, Fareham Town Centre (FTC5) and Delme Court (FTC10)	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 79 is to the east of these site, and provides a key link to The Gillies open space, and West End. HCC recommend that any development at these locations should enhance Footpath 79 through appropriate mitigation measures, to support sustainable transport and public amenity.
Lysses Car Park (FTC8)	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 98 runs alongside the proposed development site. HCC support clause f), but recommends that the development retains the right of way, ideally within a suitable green corridor and that connections are provided to it.
HA2: Newgate Lane South	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 76 runs along the northern part of the site, where it connects with other rights of way. A number of other rights of way are located to the east of the site. HCC recommend that any development at this location retain Footpath 76 within a buffer, and provide connections to the route. In addition, the County Council request that appropriate mitigation measures are provided towards enhancing the local rights of way network.
HA3: Southampton Road, Titchfield Common	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Kites Croft, which is a SINC and a HCC Countryside Service site, is located to the south of the development site. HCC therefore request that any development at this location provides appropriate mitigation measures towards the protection and enhancement of this site, to mitigate for increased recreational pressure.
HA4: Downend Road East	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. The allocation appears to use Fareham Footpath 117 for vehicular access to the

	<p>east. HCC would not support the use of this right of way for vehicle access. Notwithstanding this, we have aspirations to improve the rights of way network within the vicinity of this site, so would request that appropriate mitigation measures be provided to enhance the local network, and mitigate for increased recreational pressure.</p>
<p>HA5: Romsey Avenue HA6: Cranleigh Road</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 111a and Wicor, which is a nature reserve and a Countryside Service site, are a short distance to the south of these development sites. To mitigate for the increased pressure upon these assets which the development would generate, HCC request an appropriate mitigation strategy be agreed.</p>
<p>HA7: Warsash Maritime Academy</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 10 runs along the southern boundary of the site, while Fareham Footpath 6, which forms part of the long-distance walking route, the Solent Way, is just to the west of the site. In addition, Hook with Warsash, and Strawberry Field, which are Countryside Service sites, are just to the south and north of the site respectively. Should this site be allocated for development HCC would expect an appropriate mitigation package to be agreed towards protecting and enhancing both the rights of way network and the Countryside Service sites. Furthermore, we request that a suitable buffer be provided alongside Footpath 10 to protect its amenity value.</p>
<p>HA8: Pink Hill HA16: Military Road HA20: North Wallington and Standard Way E5: Standard Way</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 505 runs along Paradise Lane to the east of these sites. HCC have an aspiration to upgrade Footpath 505 to a multi-user route and provide a link along Military Road to Fareham Bridleway 100 in Broadcut. The County Council would like to explore whether these site allocations could help deliver this aspiration.</p>
<p>HA10: Funtley Road South HA18: Funtley Road North</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Bridleway 515 runs to west of the site, while a disused railway line runs to the east. HCC have aspirations to upgrade Bridleway 515, and provide a right of way along the old railway line. As such, the County Council requests appropriate mitigation from these allocations towards helping to achieve these aspirations.</p>
<p>HA12: Moraunt Drive</p>	<p>Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Bridleway 515 runs to west of the site, while a disused railway line runs to the east. HCC have aspirations to upgrade Bridleway 515, and provide a right of way along the old railway line. As such, the County Council</p>

	requests appropriate mitigation from these allocations towards helping to achieve these aspirations.
HA13: Hunts Pond Road & HA19: 399 – 409 Hunts Pond Road	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Kites Croft, is directly the east of the site. As such, HCC request that any development at this location includes an appropriate buffer to Kites Croft, as well as providing a contribution towards protecting and enhancing the site from recreational pressure. In addition, the County Council have an aspiration to provide a multi-user route along Hunts Pond Road, so would request appropriate mitigation towards achieving this.
HA15: Beacon Bottom West HA26: Beacon Bottom East HA1769 Botley Road	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC have an aspiration to formalise a route across this site between Beacon Bottom and Botley Road, so the County Council request that this aspiration is incorporated into these allocations.
HA21: Hampshire Rose HA22: Wynton Way	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 81 runs along Fareham Park Road. HCC would expect any development at this location to minimise impacts upon this route. In addition, the County Council have an aspiration to formalise a link from Highlands Road to Mayles Lane, and as such, request that these allocations include appropriate mitigation towards achieving this aspiration.
HA23: Stubbington Lane HA25: Sea Lane	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. The Solent Way runs along the coast to the south of this site, and will provide a valuable recreational and utility resource for the future residents of this site. There is a need to protect and enhance the Solent Way, and therefore request that appropriate mitigation is provided from this allocation.
HA24: 335 – 357 Gosport Road, Fareham	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Fareham Footpath 77b is located a short distance to the east of this site. There is an aspiration within the Gosport Borough Council Cycle Strategy, which HCC support, for a multi-user route going south from this site, parallel to the BRT. HCC would therefore like to explore whether this allocation could help achieve this aspiration via appropriate mitigation.
EA1: Faraday Business Park	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC has a joint aspiration with Gosport Borough Council to provide a new multi-user link from Gosport Road to Broom Way, to provide sustainable travel access to the Alver Valley Country Park. Such an enhancement would be of



	benefit to the future occupiers of the Faraday Business Park, in providing better transport links and recreational opportunities. HCC therefore would like to explore whether this allocation could help achieve this aspiration.
EA2: Swordfish Business Park	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. HCC has an aspiration to create a new PROW across the Daedalus site, roughly along the southern boundary of this site. HCC would therefore like to explore whether this allocation could help achieve this proposal, which would be of benefit to future occupiers of the business park.
EA3: Solent 2	Hampshire County Council has a statutory responsibility as the Highway Authority for Public Rights of Way, in addition the Countryside Service manages Countryside Sites and Country Parks throughout Hampshire. Whiteley Woods, which is a SINC, and an HCC Countryside Service site, is located just to the north of this site. The Woods will provide a valuable recreational facility for the future occupiers of this business park, and the County Council therefore request that appropriate mitigation is secured from this allocation towards protecting and enhancing this Countryside Service site.
EA4: Midpoint 27, Segensworth South	With regards to Criterion b), Fareham Borough Council are advised that there is an existing hammerhead access from Cartwright Drive in anticipation of serving the development of this site.

## **Local Highway Authority comments**

The following response is on behalf of Hampshire County Council (HCC) as local highway authority to the Fareham Borough Council Local Plan consultation draft.

HCC is the highway authority for all roads in Hampshire except for motorways and trunk roads and this response is concerned with the potential highway and transportation impacts of the land use proposals set out by the Borough Council on the local road network.

HCC support the methodology of the Borough Council in preparing an interim Transport Assessment (TA) and the use of the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the borough. The purpose of the TA is to identify those key locations on the transport networks where impacts have been predicted by the strategic model as a focus for further investigation and to identify potential mitigation measures to deal with significant impacts. It should be noted that the use of the SRTM and the TA assessment is focused at a strategic level and intended to identify potential strategic transport infrastructure obstacles to successful delivery of the development levels proposed in the local plan review in combination. Specific comments and amendments to the interim TA have already been shared with FBC officers. The TA and this response do not concern themselves with the localised traffic and transportation impacts of each development site and these will need to be assessed by site or cluster specific TAs that can be prepared in full knowledge of the detailed characteristics of each site and its surroundings.

In general terms HCC acknowledge the need to accommodate additional development within the Borough in line with the assessed needs for housing across the sub region and supports a plan-led approach to ensure that development proposals can be assessed at a strategic and a local level to ensure that it can be directed to locations that have or can be provided with adequate transport infrastructure. In these terms it is important that the Borough Council make progress with bringing forward the strategic housing allocation at Welborne and that the Plan facilitates the opportunity to promote comprehensive access to development where sites are clustered.

The local geography in the south of the borough lacks east west connectivity which means that access is channelled via north south corridors to the A27 /M27 corridors, placing significant pressure for movement along each north south corridor and at their junctions onto the A27 and M27. This situation is exacerbated by the lack of rail access within the Gosport peninsula. In this context the primary focus of the County Council as highway authority is to:

- Maintain the function of the M27 and A27 for strategic connectivity
- Maintain and where appropriate improve the safety and capacity of the networks linking local communities to the A27 and beyond.
- Further develop the concept and provision of public transport including Bus Rapid Transit within the borough and with links to adjoining areas.

- Promote access to local services and facilities by sustainable transport modes (public transport, walking and cycling).

Key principles for the Local Plan are listed below. Comments relating to specific policies and proposals are set out in the table below.

### 1. Proposed BRT improvements

The local plan needs a positive statement in the text about BRT in general including the investment to date with the Eclipse busway scheme and the latest government funding for extending the southern section of the busway to Rowner Road in Gosport. HCC support the delivery of a BRT network in SE Hampshire with future extensions to Fareham station, Welborne, QA hospital, Portsmouth and beyond. Solent Transport has recently commissioned a study to identify the highway infrastructure requirements for expanding the BRT network across the Borough and with links to adjacent boroughs. In the event that additional land is required for highway purposes this will be identified once the requirements are known.

### 2. Development strategy

HCC supports a development strategy that locates housing allocations either:

- near existing services and facilities so that these can be readily accessed by walking and cycling or public transport facilities or where, if such facilities are missing these can be adequately provided and funded through development; or ,
- Within major development areas that have sufficient scale to provide local essential services and facilities.

This ensures that the housing sites are accessible by sustainable modes of transport (walking, cycling and public transport) and minimises the need for trips by motor vehicles and in particular the harmful impacts of traffic on human health and environmentally sensitive environments.

### 3. Strategic road network

The A27 is a fundamental part of the strategic road network acting as a parallel route to the M27. Any new or improved junction with the A27 would need to prioritise flows along the A27 and not add additional delays to the functioning of this corridor. Substantial investment is already underway on the central part of the A27 corridor between Segensworth and Fareham as part of improving access to Fareham and Gosport by improving journey time reliability and vehicle flows. Therefore in order to optimise the operational effectiveness and maintain the functioning of this A27 corridor HCC will undertake studies for A27 East ( Titchfield gyratory to Portsmouth boundary) and A27 West (Segensworth to Windhover roundabout) to identify the scope for potential improvements. In the event that additional land is required for highway purposes this will be identified once the requirements are known.

### 4. Newgate lane allocation HA2

**HCC raises an objection to this proposal.** The purpose of the current improvements to Newgate Lane is to address existing traffic congestion and environmental issues on Newgate Lane and other corridors providing access to the Gosport peninsula and to facilitate better strategic access to jobs at the Solent Enterprise Zone at Daedalus (which is also the case for the proposed bypass of Stubbington that would pass through the gap between Fareham and Stubbington). An aim of the Enterprise Zone is to contribute to reducing the number and duration of

vehicle trips on roads on the Gosport peninsula, in particular out commuting towards the A27 /M27 to access employment in the morning peak travel period. It is therefore the policy of the County Council to maintain the utility of the improvements provided to Newgate Lane in these terms. Consequently the proposed housing allocation which is likely to increase both the levels of out-commuting from the peninsula in the morning peak travel period and negate the purposes of the Newgate Lane improvements is not supported.

#### **5. Development allocations**

All development allocations need to submit a transport statement/assessment, as determined by the highway authority, in order to identify the impacts of additional trip generation on the transportation networks and propose appropriate mitigation measures. Highway access to new development should be located where capacity can reasonably be provided on the local and strategic network.

#### **6. Sustainable Transport**

HCC supports the requirement that all new development should reduce the need to travel through promoting sustainable transport modes and by making the layout of the site accessible by walking, cycling and public transport.

#### **7. On/off site highways mitigation**

The Highways Authority welcomes the requirement for all new development to deliver the necessary infrastructure that is needed to serve the site and especially the acknowledgment of the role financial contributions have in securing that provision. It is noted that the Community Infrastructure Levy is the primary mechanism for contributing towards off-site strategic infrastructure. The County Council is concerned with this approach, in particular, its implications for transport infrastructure. The delivery of costly, off-site highways and transport infrastructure is expected to be funded by the developments that generate that impact. The evidence to date suggests that the likely cost of necessary infrastructure, required to mitigate any impacts of new development, will far exceed what has been collected through CIL, and that which is likely to be collected in future years.

The County Council acknowledges that the current Regulation 123 Spending List pre-dates the current plan approach and welcomes the commitment to monitor and review the current List. The County Council would request that it is consulted on any such review and subsequent approach to ensure that the right infrastructure can be provided in the right places, at the right time. This is particularly important with regard to the approach to highway improvements, as the Local Highway Authority's ability to secure section 278 works to deliver site specific improvements may be fettered if the Regulation 123 list includes highway and transport improvements as a generic infrastructure item.

**In view of the above comments, Hampshire County Council objects to policy HA2 (Newgate Lane South) and in addition places a holding objection to the local plan until such time as the Local Plan TA has been finalised and the strategic transport impacts of the proposed allocations have been adequately assessed with evidence that any significant impacts can be adequately mitigated.**

HCC will continue to work with FBC to assist in completing the Local Plan TA and thereby remove the holding objection.

<b>Page number/ Para/Policy</b>	<b>Highway Authority detailed comments</b>
Pg 11 Vision 2036	In the Vision 2036 add reference to BRT eg The delivery of a high quality public transport system will be promoted including extending the Bus Rapid Transit network to serve Fareham Borough, Welborne Garden Village and the adjacent areas.
Pg 12 Key strategic priorities	In the priorities add a specific reference to transport eg Provide an integrated and sustainable transport network for all modes of transport that supports development within the borough and enables economic growth.
pg 15 para 3.2 Development strategy	<p>HCC support in principle the strategic allocations which are spread across the borough so long as there is evidence to demonstrate that the strategic road network will not be significantly affected and that where necessary appropriate mitigation interventions are proposed. The A27 is a fundamental part of the strategic road network and the priority will be to maintain this road hierarchy by not adding unacceptable additional delays to the efficient functioning of this corridor.</p> <p>HCC support the methodology of the interim Transport Assessment (TA) and the use of the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the borough. The purpose of the TA is to identify those key locations on the transport networks where impacts have been predicted by the strategic model as a focus for further investigation and to identify potential mitigation measures to deal with significant impacts. It should be noted that the use of the SRTM and the TA assessment is focused at a strategic level and intended to identify potential strategic transport infrastructure obstacles to successful delivery of the development levels proposed in the local plan review in combination. The model assessment and the TA is not intended to assess the transportation impacts to arise from individual development sites. The planning application process will determine specific transport impacts associated with each development site.</p> <p>Access to new development should be located where capacity can reasonably be provided on the local and strategic network. The interim TA shows that the incremental traffic impact of all the site allocations is forecast to affect links and junctions on the wider highway network which might not be attributed to an individual site allocation.</p> <p>HCC recognise that the next stage of the TA will be to assess the strategic impacts of the allocations and propose a package of mitigation measures. HCC will continue to be involved in the review of the mitigation interventions and specific locations. The package of interventions will need to include extensions to the BRT wider network, pedestrian and cycle facilities as well as capacity improvement schemes at junctions.</p>

Pg 20 SP2 - Welborne	Supported subject to adequate access arrangements including provision of an improved junction 10 in the M27 Motorway.
Pg 22 Strategic Policies – Policy SP3 Daedalus	<p>Supported on the basis that this will enhance employment opportunities on the peninsula and reduce the need for local residents to travel beyond the peninsula for work.</p> <p>In para 4.12 expand the reference in the text to explain the purpose of the Newgate lane transport scheme eg The Newgate lane corridor improves access to Daedalus and the peninsular in order to boost the employment potential of the site and to improve journey time reliability to Fareham and Gosport.</p>
Pg 24 Policy SP4 - Fareham town centre	<p>Supported on the basis that future residents will be able to access town centre services and facilities.</p> <p>Add reference in bullet point (l) to BRT eg ...improve public transport provision including future extensions to BRT from Redlands road to the Fareham station ...</p>
Pg 101 Infrastructure – Policy INF1- Infrastructure delivery	Add reference in policy to the need for development proposals requiring a full transport assessment. Eg Planning permission will be granted where it can be demonstrated that .... A full Transport Assessment for the new or improved infrastructure has been submitted as determined by the Highway Authority.
Pg 104 para 11.17	Add reference to BRT network eg ... and including delivering extensions to the BRT network.
Pg 105 para 11.21	Add reference to BRT network eg ...and improvements to bus infrastructure and services including extensions to the BRT network
Pg 109 Policy INF2 - Sustainable Transport	<p>In bullet point (b) add .... as evidenced through a Transport Statement or Transport Assessment determined by the highway authority.</p> <p>In bullet point ( c) add ..and integrates with existing pedestrian, cycle and public transport routes</p> <p>In bullet point (d) add Fully exploits pedestrian, cycle and public transport networks improvements which encourage the use of ...</p> <p>Add a new bullet point to say Provides improvements to the quality and frequency of bus services including extensions to the BRT network.</p>
Pg 110 after sustainable transport policy	<p>Add a new sub heading and supporting text on Bus Rapid Transit.</p> <p>The local Plan needs to add a positive statement about BRT in general including the investment to date with the Eclipse busway scheme, latest government funding for extending the southern section of the busway to Rowner Road in Gosport and the desire to extend the network eg BRT is promoted by HCC and Solent Transport who support the BRT network in SE Hampshire with extensions to Fareham station, Welborne, QA hospital</p>

	<p>and Portsmouth.</p> <p>Feasibility studies previously commissioned by Solent Transport have identified a wider network of BRT routes in SE Hampshire which were categorised as short, medium and long-term in terms of their potential implementation. These include the Fareham to Gosport routes, Fareham to Queen Alexandra Hospital in Portsmouth and Fareham to Welborne.</p> <p>Solent Transport has recently commissioned a study to identify the highway infrastructure requirements for expanding the BRT network across the borough and with links to adjacent boroughs. In the event that additional land is required for highway purposes this will be identified once the requirements are known.</p> <p>Proposals Map - HCC support the BRT corridor Delme roundabout to Portchester as shown on the proposals map. Need to add supporting text to explain why the route is on the proposals map. Need to extend the Delme to Portchester route into town centre.</p> <p>The Proposals Map needs to show the BRT extensions within Fareham including the route into Fareham town centre from both Redlands Lane and Delme roundabout with associated land safeguarding and supporting text</p>
Pg 110 Road network improvements – para 11.43	<p>The A27 is a fundamental part of the strategic road network acting as a parallel route to the M27 therefore in order to optimise the operational effectiveness and maintain the functioning of this corridor HCC will undertake studies for A27 East ( Titchfield gyratory to Portsmouth boundary) and A27 West (Segensworth to Windhover roundabout) to identify the scope for potential improvements. In the event that additional land is required for highway purposes this will be identified once the requirements are known.</p> <p>Add reference to the whole of the Newgate lane corridor and investment and not just refer to northern end improvements.</p>
Pg 111 Policy INF3 – road network	<p>Under reference to BRT add the names of the future routes in Fareham eg to Fareham Station, Welborne and Portchester.</p> <p>Suggest these routes are added to proposals map in order to safeguard the routes. Delme to Portchester is the only BRT route shown on the proposals map.</p> <p>Expand the safeguarding of the land to include BRT extensions (in adopted plan), Newgate Lane (in adopted plan) and the A27 Barnes lane junction.</p>
Pg 114 Development Allocations – Policy DA1	<p>Need to add some general policy wording which can be applied to all the development allocations to ensure that they</p> <ol style="list-style-type: none"> <li>a) have a transport assessment</li> <li>b) encourage sustainable travel by all modes</li> <li>c) ensure the developments are accessible by pedestrians and cyclists</li> </ol>

	<p>d) mitigate the impacts of additional traffic on the highway network, environment, air quality and amenity</p> <p>e) secure on site and/or off-site highway improvements.</p> <p>This policy needs to complement policy INF3 Sustainable Transport.</p> <p>Suggest add reference to SPDs for car parking etc</p>
Pg 114 para 12.3	Check list of local plan policies is correct as not sure the policy Transport and parking (T1) exists.
Pg 116 Development allocations	<p>The planning application process can't rely solely on the specific criteria set out in the site allocation policies FTC1 etc as these descriptions do not provide the complete picture and do not include the findings of a transport statement/assessment. Therefore it needs to be clear that any specific transport measures listed in the development allocation descriptions are not absolute and that the list is not exhaustive.</p> <p>Suggest add a generic statement to be included in each allocation which will secure delivery of measures (through s106 contributions or s278 agreement) to mitigate the impact of the development.</p>
HA1 North and South Greenway Lane HA7 Warsash Maritime Academy	<p>HCC support the housing allocation located in an existing residential area with local shops and facilities and served by public transport. However there are concerns on the impact of the trips generated from the Warsash allocation on the A27 corridor and specifically the Barnes Lane and Brook Lane junctions.</p> <p>The A27 is part of the strategic road network and the priority will be to maintain this road hierarchy by not adding unacceptable additional delays to the functioning of this corridor. Therefore any improved junction with the A27 would need to prioritise flows along the A27. Substantial investment is already underway on the eastern part of the A27 corridor between Segensworth and Fareham as part of improving access to Fareham and Gosport by improving journey time reliability and vehicle flows. Therefore further study work will be needed to investigate the impact of the proposed allocations on the western section (Segensworth to Windhover roundabout) of the A27 corridor.</p> <p>Suggest that mitigation for site and/or off-site highway improvements is secured for local improvements to the A27 corridor.</p> <p>A Masterplan for the whole of this allocation is required in order to fully understand how the site is accessed and in particular how the different parcels of land are linked and the interaction of the internal roads, cycle routes and footpaths. Also for the site as a whole there is a need to fully understand the details of the transport interventions which will be required to mitigate traffic impacts on the local and strategic road network.</p>
HA2 Newgate Lane South	<p><b>HCC object to this proposal.</b></p> <p>The purpose of the current improvements to Newgate Lane is to address</p>



	<p>existing traffic congestion and environmental issues on Newgate Lane and other corridors providing access to the Gosport peninsula and to facilitate better strategic access to jobs at the Solent Enterprise Zone at Daedalus(which is also the case for the proposed bypass of Stubbington that would pass through the gap between Fareham and Stubbington). An aim of the Enterprise Zone is to contribute to reducing the number and duration of vehicle trips on roads on the Gosport peninsula, in particular out commuting towards the A27 /M27 to access employment in the morning peak travel period. It is therefore the policy of the County Council to maintain the utility of the improvements provided to Newgate Lane in these terms. Consequently the proposed housing allocation which is likely to both increase the levels of out-commuting from the peninsula in the morning peak travel period and negate the purposes of the Newgate Lane improvements is not supported.</p>
<p>HA3 Southampton Road</p>	<p>It is not clear that this allocation is well located in relation to local services and facilities accessible by active travel modes and therefore does not appear to accord with the general principles of sustainability in that they are unlikely to reduce the number and duration of vehicle trips. HCC raises concern with this allocation and will comment further once the local plan TA has been finalised and it has been determined whether these concerns can be addressed at a strategic level.</p>
<p>HA4 – Downend Road East</p>	<p>It is not clear that this allocation is well located in relation to local services and facilities accessible by active travel modes and therefore does not appear to accord with the general principles of sustainability in that they are unlikely to reduce the number and duration of vehicle trips. HCC raises concern with this allocation and will comment further once the local plan TA has been finalised and it has been determined whether these concerns can be addressed at a strategic level.</p>
<p>HA5 Romsey Avenue HA6 Cranleigh road</p>	<p>HCC support the location of the Portchester South housing allocations in existing residential areas which are served by local shops, facilities and public transport. However we are concerned that the trips generated from the allocations will feed additional traffic onto roads in the local road network which are difficult to improve. Therefore the site promoters will need to prove that the sites and local facilities are accessible by walking, cycling and public transport and will need to assess the impact on the local roads of traffic heading to the A27 corridor and secure site and/or off-site highway improvements to mitigate the impact of the development.</p> <p>HCC has concerns about the impact of both the Portchester Down End (HA4) and the Portchester South allocations on the Delme roundabout and the A27 Portchester Road. This includes the impact on the identified accident sites at the both the Castle street and West street roundabouts on the A27 in Portchester which are both the subject of a bid to the DfT Safer Roads Fund. Therefore the cumulative impacts of development along the A27 corridor between the Delme Arms Roundabout and the city boundary need to be assessed and any identified significant impacts mitigated.</p>

HA8 - Pinks Hill	It is not clear that this allocation is well located in relation to local services and facilities accessible by active travel modes and therefore does not appear to accord with the general principles of sustainability in that they are unlikely to reduce the number and duration of vehicle trips. HCC raises concern with this allocation and will comment further once the local plan TA has been finalised and it has been determined whether these concerns can be addressed at a strategic level.
------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------