Comment on the Draft Fareham Local Plan 2036

How to have your say

Complete this form and submit it to the Council by Friday 8 December 2017. Please return to Consultations, Fareham Borough Council, Civic Offices, Fareham PO16 7AZ.

Please provide your contact details at the end of this survey. Doing this will help us to understand where people's views are coming from. Your name and address may be published but it will not be used for any other purposes.

What would you like to comment on?

- [x] A site allocated for housing
- [ ] A site allocated for employment
- [ ] Strategic Policies
- [ ]
- [ ] Employment
- [ ] Retail
- [ ] Community Facilities and Open Space
- [x] Natural Environment
- [ ] Design
- [ ] Infrastructure (Including Transport)
- [ ] Housing Development Allocations (chapter introduction)
- [ ] Implementation and monitoring
- [ ] Other

Please provide the name of the site allocation or policy you want to comment on:

Romsey Avenue Portchester

What do you want to do?

Support	Object	Comment
☐	☑	☐

- A site proposed for development
- Portchester
- HA5

Please provide your comment below:

FARMING LAND:

I was born and brought up in the heart of Portsmouth and therefore know what it is like to live in an urban jungle. Moving to Portchester and to Romsey Avenue when I was married almost 30 years ago, has made me appreciate it's semi-rural location. The fields south of Romsey Avenue have been used for crop farming for almost 40 years. My family and I have seen this at first hand. It provides a wide variety of cereal crop and has supported the feeding requirements for multiple forms of wildlife in the designated coastal plain.

In the current political climate we find ourselves in, with exit from the EU happening, there will be a greater dependence as a country to provide food for ourselves rather than having to import.

FAREHAM
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The 'Strategic Housing Land Availability Assessment' (SHLAA) put the Agricultural Land Classification of Site 207 (Romsey Avenue, Portchester) at ***46% Grade 1, 53% Grade 2.***

The Agricultural Land Classification (ALC) system classifies Grade 1, 2 and 3a as ***The best and most versatile (BMV) land****, which is deemed to be the land which is most flexible, productive and efficient in response to inputs and can best deliver future crops for food and non-food uses.*

Fareham Borough Council's advisors, Urban Edge, confirmed in their comments on the Spatial Context of the Local Plan in February 2016 that 'Hampshire as a whole is predominantly identified as Grade 3 agricultural Land (56.9%), with ***only 4.9% identified as Grade 2 and 0.4% as Grade 1****.*

Natural England recorded its view in March 2016 that "...LPAs, as part of their ***Local Plan process, should prioritise the use of lower quality land (ie non BMV) in preference to that of higher quality (grade 1, 2 and 3a)*** *in line with para.112 of the National Planning Policy Framework, Fareham should ensure that they have sufficient detailed information to apply the requirements of the NPPF at the beginning of the local plan process, in order to provide the necessary evidence to underpin the Local Plan.*

Paragraph 112 of the National Planning Policy Framework states that "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to ***use areas of poorer quality land in preference to that of a higher quality."***

Land within the Welborne policy boundary to the north and south of the M27 is only Grade 3B, yet that Site was selected for significant Housing Development.

The 'Indicative dwellings yield' for Site 207 is 228.
Compare that with the Strategic Housing Land Availability Assessment (SHLAA) for the following sites which the Local Plan ***'discounted':-***

(i) Site 1341, Stubbington. ALC Grade 2. Yield 144 dwellings.
(ii) Site 3017, Swanwick. ALC Grade 2. Yield 46 dwellings.
(iii) Site 3036, Locks Heath. ALC Grade 3. Yield 49 dwellings.
(iv) Site 3060, Titchfield. ALC Grade3. Yield 40 dwellings.
(v) Site 3109, Sarisbury. ALC Grades 2 and 4. Yield 41 dwellings.

Five sites of lower agricultural/ecological value than Romsey Avenue have been discounted, yet they could have cumulatively yielded 320 dwellings ie 92 dwellings more than the allocation.
If Fareham Borough Council had robustly applied an objective sequential test, Site 207 would not, indeed should not, have been allocated.

The Executive Committee is clearly in breach of its own and national policies in sequential testing of land quality. The Local Plan is clearly ***UNSOUND*** *to include Site 207 on Agricultural quality ahead of multiple other sites.*

Make another comment

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WILDLIFE CONSERVATION

Site 207 is part of the Coastal Plain and forms a natural rural barrier between Portchester and Fareham. Coastal Plains were part of the Council's plans to protect and maintain.

The area accommodates a whole variety of wildlife. We always know when the summer is fading as the Brent Geese swell in numbers during the evenings, using the fields as the rendezvous and safe haven before eventually flying south. There are also many other types of birds and animals, including deer, badgers, foxes and field mice, not to mention the abundant insects. It is disgraceful to see how these creatures will be needlessly driven out to an ever diminishing area where they can thrive.

Since the developers for this land (Foreman Homes) have published their proposals, there have been a number of strange and despicable incidents which have infuriated the residents.

- *Hedgerows, normally cut-back only once, have been cut back severely three times already.*
- *Late night activity in the field - Laser pens observed aimed at the foraging and nesting birds.*
- *One of the deer, regularly seen in the fields, heard 'whining' late at night. Now it has gone.*
- *A 'Hunters chair' retrieved from the hedgerow - reported to Police.*
- *Local vets reporting substantial increase in animals with stomach upsets.*

It is my opinion that the developers are extremely concerned in losing this land for housing due to the Wildlife issues. It appears they are hell-bent on destroying the habitat area so no wildlife exists.

Paragraph 113 of the National Planning Policy Framework states that 'Local planning authorities should set criteria based policies against which proposals for any development on or affecting wildlife or biodiversity sites or landscape areas will be judged...Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.'

Tens of thousands of birds come to the Solent coast for the winter and there are three Special Protection Areas (SPAs) to safeguard them.
Paragraph 4.40 of the Local Plan Part 2(2015) records recognition that "Fareham Borough is an internationally important wintering location for Brent Geese and wading bird species, with several Solent coastal areas within and around the Borough designated as Special Protection Areas (SPAs)...Brent Geese and waders (SPA birds) are also dependent on a network of habitats providing feeding and roosting areas, ***outside of the SPA boundaries****...*

These 'supporting sites' are functionally linked to the SPAs and adverse impacts to supporting habitats may affect their integrity... ***There is a presumption against development that adversely affects SPA supporting habitats****...Such known sites of value have been defined and identified in the Solent Waders and Brent Goose Strategy (2010),including sites of 'important' or* ***'uncertain'*** *value."*
*Paragraph 4.43 states that "****Where a negative impact on a SPA bird supporting site cannot be avoided or satisfactorily mitigated, planning permission is likely to be refused.****"*

Paragraph 4.44 of the Core Strategy (2011) stated that "The Council recognises that additional growth in the Borough, in combination with growth in neighbouring authorities, without appropriate management and mitigation, could lead to adverse effects upon the European Sites...It will continue to work with the other PUSH authorities to provide further certainty on likely impacts and the implementation of any necessary avoidance or mitigation Continuation measures...The Council has and will continue to support the Solent Disturbance and Mitigation Project and will work with partners in the sub-region to develop and implement a strategic approach to protecting European Sites...The Borough Council also supports the 2010 Solent Waders and Brent Goose Strategy and ***will continue to give suitable protection to identified important sites.****"*

Fareham Borough Council's advisors Urban Edge reiterated the principle established by the Solent Waders and Brent Goose Strategy in 2010 that "Development Plan Documents in the Borough should seek to protect both currently important sites and sites which may become important in future years due to factors such as climate change, ***to ensure the overall availability of roosting and foraging sites does not decrease.****".*

The Strategic Housing Land Availability Assessment (SHLAA) for the following sites which the Local Plan ***'discounted':-***

(i) Site 1341, Stubbington. 'Uncertain'.
(ii) Site 3017, Swanwick. 'No Geese'.
(iii) Site 3036, Locks Heath. 'No Geese'.
(iv) Site 3060, Titchfield. 'No Geese'.
(v) Site 3109, Sarisbury. 'No Geese'.

The Executive Committee has not applied any of the aforementioned policy rules in protection of the Wildlife. Site 207 is the ONLY coastal plain site. The Local Plan is clearly ***UNSOUND*** *to include the Romsey Avenue Site 207 on Wildlife Conservation issues ahead of multiple other sites discounted.*

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INFRASTRUCTURE

The inclusion of Site 207, as well as the other Portchester and Cranleigh Road sites, will yield 700 new homes on Green-Field sites. This will bring 2000 extra people and 1000 extra cars into an area which is not a town but a village. ***None*** *of these developments make any provision to improve the infrastructure of the community for additional Education, Recreation, Transport, Medical or Social Care. This is completely unfair to a Community that already struggles to receive a decent level of services to its current residents. Since the developers for this land (Foreman Homes) have published their proposals, they have carried out at least two traffic surveys along Romsey Avenue and on the A27 at the Beaulieu Road junction.*

These have both been conducted over the school half-term period. The resultant data they have therefore gathered is completely false information as to the true traffic flow through this area, which any resident will confirm is chaotic at peak times. This is just another example of the developers aim to counter any objection on the grounds of road use, pedestrian safety and increase in CO2 emissions.

EDUCATION

Extra homes bring a requirement for extra School places. This is especially applicable to Romsey Avenue, having Wicor School and a catchment area for the popular Cams Hill School.

Further development will swamp the class sizes at Wicor School and further reduce the catchment area for Cams School to other Portchester residents.

Paragraph 72 of the National Planning Policy Framework states that "The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities... ***Local planning authorities should take a proactive, positive and collaborative approach*** *to meeting this requirement and to development that will widen choice in education."*

RECREATION

There has been NO improvement in recreation facilities in Portchester for decades. The Community Centre land was halved to provide extra housing. The Green-Field spaces are all disappearing to development.

Paragraph 73 of the National Planning Policy Framework states that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities...Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision...The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area."

Paragraph 5.17 of the Core Strategy (2011) stated that "There are parts of the Borough with shortages of public open space, particularly in Fareham, Stubbington and ***Portchester****."*

TRANSPORT

The access route to the proposed Foreman Home area is the current 'lane' separating No.14 and 16 Romsey Avenue where numerous vehicles already park. The proposals show a tapering of the pavement area along Romsey Avenue to improve visibility. This can only be achieved by preventing cars from parking along these areas. The access along Beaulieu Avenue is already highly congested to the main A27 prompting moves that this will become a no parking road. The loss of existing parking along Romsey Avenue, the field lane and Beaulieu Avenue will amount to forty plus cars. There will undoubtedly be overspill parking from these new developments to Romsey Avenue, thus accentuating the problem. This is totally unacceptable and unfair to the existing residents.

Paragraph 2.21 of the Core Strategy (2011) states that "Fareham Borough has good access to the M27 motorway however there are high levels of local congestion around the motorway junctions as well as along the A27 and the A32/B3385 to Gosport, particularly at peak times."

The Interim Transport Assessment by Atkins in October 2017 identified the two junctions that are most likely to be impacted by the incremental traffic generated by the aggregated allocations (Portchester Downend East and Portchester South) and the junctions with repeated road safety incidents – A27 west from Delme Roundabout and the A27 Portchester Road/Dore Avenue Roundabout. The Romsey Avenue allocation would have a material impact on junctions that already have significant capacity issues.

It is likely that the Romsey Avenue allocation would generate c.900 vehicle movements a day, with c.100 movements during the am/pm peak hours. The vast majority of that traffic would be towards the A27 via the dog-leg of the site's access stub, Romsey Avenue and Beaulieu Avenue. These carriageways are residential streets with a busy on-street parking situation that restricts two-way movement for much of their length. Development of the Romsey Avenue site would require these roads to act as the primary link to and from the site and thereby support a substantial increase in traffic flow, a purpose and level of use for which they were never intended. Children attending Wicor Primary and Cams Secondary Schools pass along Romsey Avenue and a substantial increase in vehicle movements at the junction would pose a significant highway danger.

CO2 emissions are already excessive on the A27 roads towards Fareham Centre. Additional cars in our vicinity can only make this situation worse and lead to poor air quality and potential health problems.

MEDICAL & SOCIAL CARE

Doctors surgeries, dentists and pharmacies are all stretched to breaking point in Portchester.
Appointments and waiting lists are getting worse month on month. Services are being reduced, removed or out-sourced to other areas, bringing extra stress for those needing help.
Extra homes and people in the Portchester area will only exasperate this situation.
Once again the Local Plan does not address how or why Portchester should take the brunt of the housing increase with NO improvement in welfare facilities.

ALTERNATIVES TO ROMSEY AVENUE

Newlands Farm – Ref 3008

It is unbelievable that the Executive Committee has not included this site on the Local Plan as it provides everything to support the infrastructure in that area.
The proposed developer has highlighted what they will deliver :-

1100 Homes on land South of Longfield Avenue.
Agricultural use – Grade 2
Stubbington by-pass complete.
80 Bed Care Home
A Health Centre
A Primary School
Retail Outlets
Green Spaces
Integrity of the Strategic gap.

West of Newgate Lane – Ref 3129

Another site, right in the heart of Fareham and discounted from the Local Plan by the Executive Committee is Site 3129.

122 Homes provision
Farm Land Grade 3
Development could be accommodated without significant effect on landscape.
Traffic links in place.

South of Oakcroft Lane – Ref 1341

144 Homes provision
Farm Land Grade 2
Very limited traffic flows.

Make another comment

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STRATEGIC POLICIES

The Strategic Policies of the Local Plan are contrary to the selection of Site 207 Romsey Avenue selection in the following areas

***SP1** – Presumption in favour of 'Sustainable' development.*

- *Change for better – Actually it will be making life harder for all Portchester residents.*
- *Not worse for future generations – Really? Urban jungle, No more green-fields.*
- *Improve places where we live our lives – There are no improvements to infrastructure.*
- *Ensure Infrastructure & services built early – What Infrastructure/services?*
- *Early and meaningful engagement with community – No involvement in selection process*

***SP3** – Daedalus Strategic Development Site.*

- *98,000 sq m of floor-space*
- *IFA2 Connector £500m*
- *Innovation Centre £70m – 300 jobs*

With this vast amount of land why is housing near to this 'work-place' not included?

***SP5** – Development in Countryside.*

- *Development outside of urban areas strictly controlled to protect countryside and coast.*

The development of Cranleigh does NOT make Site 207 an urban area.

***SP6** – Development in Strategic Gaps.*

- *To prevent coalescence of urban areas.*
- *To maintain separate identity*
- *Not permitted where causing severe adverse harm.*

The allocation of Site 207 contravenes all elements of tis policy.

DEVELOPMENT STRATEGY

Every local housing authority is required to demonstrate how it will meet an appropriate share of the housing need in its housing market area and to plan positively for the delivery of sufficient new homes to support future prosperity in its area. To support ongoing work on local plans, the Partnership for Urban South Hampshire (PUSH) commissioned the preparation of a new Strategic Housing Market Assessment (SHMA) in 2013. The South Hampshire SHMA provides essential background information for those authorities preparing local, plans and the evidence of their 'duty to cooperate'. The SHMA is not policy in itself but forms a part of the evidence base that will help the PUSH local planning authorities in the review of the spatial strategy to 2036.

Paragraph 3.12 of the Core Strategy (2011) set one of its 'Strategic Objectives' as being "To deliver the South Hampshire Strategy in a sustainable way, focusing development in Fareham, the Strategic Development Area north of Fareham and the Western Wards." And its paragraph 5.23 stated that ***"The Council does not expect Portchester to play a significant role inproviding further housing provision over the plan period****...The SHLAA identifies the settlement as capable of providing limited housing development* ***(around 60 dwellings)****."*

THE SOUNDNESS TEST

Paragraph 182 of the National Planning Policy Framework states that 'The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound', ie that it is:

Positively prepared *– the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities;*

Justified *– the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

Effective *– the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*

Consistent with national policy *– the plan should enable the delivery of sustainable development in accordance with the policies in the Framework*

FINDINGS

Through the NPPF, Central Government has made known its view that local communities should have a greater say in the planning of their areas. In this case, the views of the residents of Portchester West should be accorded weight in the future of the land south of Romsey Avenue. PUSH, SHLAA, SHMA have a part to play but it is Fareham Borough Council that has the last word on the strategy that should be adopted for its area. No issue is taken with Fareham Borough Council's call for more housing to meet its demographic needs but the planning system is required to strike balances between economic, social and environmental factors and, in allocating land at for housing development, Romsey Avenue, the right balance has not yet been struck. Agricultural land of Grade 1 and 2 quality in combination with an 'uncertain' status as Brent Goose feeding grounds that support the Portsmouth Harbour Special Policy Area give absolute values to this land, while the lesser qualities of five discounted sites show clearly that the allocation of this site for housing development did not derive from robust objective assessment. Further, the generation of c.900 vehicle movements a day by the proposed development would increase traffic flows through junctions which already display repeated road safety incidents (A27 west from Delme Roundabout and Portchester Road/Dore Avenue Roundabout) and require residential streets with on-street parking to fulfil a role for which they were never intended.

OBJECTIONS

SHLAA Sites 1341, 3017, 3036, 3060 and 3109 have lower agricultural and/or ecological value but have been passed over in favour of Site 207 'Romsey Avenue, Portchester'; the sequential test of development prospect has evidently not been objectively applied. The favoured strategy does not derive from the examination of reasonable alternatives. The inclusion of Site 207 as a residential allocation is unjustified and inconsistent with national policy (especially paragraphs 112 and 113 of the National Planning Policy Framework), so the draft plan is ***unsound****.*

The vehicular traffic generated by the proposed development (c.900 vehicle movements a day, with c.100 movements during the am/pm peak hours) would be detrimental to highway safety at two junctions which already experience repeated road safety incidents (A27 west from Delme Roundabout and the A27 Portchester Road/Dore Avenue Roundabout), generate unacceptable environmental circumstances on residential side-roads which are unsuited for the purpose and pose a particular hazard for children walking and cycling to local schools. It is submitted that the vehicular traffic generated by the residential development of Site 207 would be detrimental to the health and safety of local residents (especially school-children) and would thereby not satisfy the definition of sustainable development set down in paragraph 7 of National Planning Policy Framework; as it would seek to promote a proposal which would not constitute sustainable development, the draft plan is ***UNSOUND.***

The Executive Committee has behaved in a dictatorial capacity, hiding behind their incompetence in not delivering on the Welborne development which would have delivered housing in the Borough for the foreseeable future on its own without having the shortfall which has instigated the need for a Local Plan.

The loss of the Cranleigh Road appeal to the Inspectorate, costing £100,000 to us taxpayers has the Council running scared now. The developers know this and blatantly mock the community by providing copious copies of the Inspectorates report. They are saying, "Resistance is futile the Government Inspectors will back us come what may"

Teresa May said at the Conservative that they all need to listen to the electorate.
It is about time the puppet master Sean Woodward and his lapdog Executive Committee woke up to the facts.
I have no faith that any of these objections will be seriously entertained by these 'Public Servants' - Another Public Enquiry will undoubtedly result from this Local Plan farce if the Council fail to see its naivety. I really hope this Council is Publically embarrased.

The evidence in the selection process of Site 207 is completely flawed and any Public Inspector will undoubtedly agree that the Local Plan is UNSOUND.

Romsey Avenue Site 207 should be removed from the Local Plan.

A bit about you

How to have your say

Please provide your contact details below. Doing this will help us to understand where peoples' views are coming from. Your name and address may be published but it will not be used for any other purposes.

Name

[redacted]

Address Line 1

[redacted]

Address Line 2

[redacted]

Address Line 3

Town

[redacted]

Postcode

[redacted]

Email

[redacted]

Thank you for having your say on the Draft Local Plan.

FAREHAM LOCAL PLAN 2036