From:

Sent:

11 December 2017 16:17

To:

Consultation

Subject:

FW: Email of Responses to Draft Local Plan

Attachments:

Words for Local Plan.pdf

Hi,

Another response that's been sent in to me- he may already have his representation saved our

system though so worth checking

Thanks

Planner Fareham Borough Council 01329 824318



From:

Sent: 11 December 2017 14:12

To:

Cc: Development Management

Subject: Email of Responses to Draft Local Plan

Hi

I submitted the attached on comments against te Draft Local Plan line but have not received an acknowledgment.

Please can you confirm it will be registered and considered in the DLP review.

Kind regards



According to Fareham Borough's Council's own figures, for the period 2011/2012 to 2016./2017, the Western wards have contributed to over 60% of the Boroughs new housing supply. The figures provided are:

# <u>Dwelling Completions in Fareham Borough "Western Wards"</u> 2011/12 to 2016/17

Ward	Total Dwelling Completions (Net)	Total Fareham Borough	1,859
Locks Heath Ward	39		
Park Gate Ward	631		
Sarisbury Ward	184		
Titchfield Common Ward	238		
Warsash Ward	54		
Total Western Wards only	1,146		

%age in Western Wards	62%
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The area covered by the Western wards is less than 40% and the draft local plan once again targets the Western wards. This level of increase is totally unrealistic, impractical and unsustainable. The infrastructure in the area is already on or above capacity and furthermore, and just as one example, the head of the FBC has publically admitted (CAT meeting Warsash) that it will be very difficult to expand schooling in the area. The addition of 1500 new homes in the Western Wards is ludicrous. Add to this the fact that less than 1 mile away, there are 550 new homes being erected on the A27 at Bursledon adding significant traffic to the already over capacity A27, where there is little or no option for creating more capacity on these roads.

The village of Warsash is renowned for its sailing heritage and involvement in the 'D' Day landings. Should the elected council wish to be remembered for destroying Warsash and all its heritage and beauty, then this will be an irrecoverable action of such magnitude that the Councillors will be remembered forever but for the wrong reasons.

Furthermore, there are significant policy's that are designed to prevent development on this scale.

What impacts that the development would have on the character of the area?

The areas proposed for development are Greenfield sites i.e. never been built on. The extreme numbers of properties proposed on these sites therefore would clearly have a negative impact.

The Adopted Fareham Borough Core Strategy (CS) 2011, <u>CS2</u> states that priority will be given to the reuse of previously developed land within the existing

urban areas. Previously developed land<sup>1</sup> is land which is or was occupied by a permanent structure and any associated fixed surface infrastructure. The definition excludes land that is or has been occupied by agricultural or forestry buildings or land in built up areas such as private residential gardens, parks recreation grounds and allotments.

I would strongly argue that the land in question here is not previously developed, has remains of former greenhouses, trees and rough grassland. This permanent loss of greenfields will change the landscape and character of the village significantly.

How the development may affect wildlife?

## CS4

Under this policy habitats important to the biodiversity of the borough will be protected. It is a known fact that ecological surveys have indicated that protected species including bats, badgers and reptiles are present at the site. In addition local residents have evidence that other species such as slow worms, dormice, foxes, barn owls, stag beetles and deer live on the site. A significant amount of natural habitat in Warsash has been lost in recent times following the development of Strawberry Fields Estate and Coldeast development.

There is significant bat activity every evening at dusk over this wider area, as far as Lockswood Road. If any development were to be permitted on these proposed sites at Greenway Lane, then the considerations regarding preserving not only the bat's habitat but also food sources and environment are all clearly set out as legal obligations in policy.

While I appreciate no specific detail or outline plan has been submitted for this site, as far as the local residents are aware, it's inclusion in the Council's outline plans are surely not in line with the clear policy, directives and law regarding the protection of these species.

The policy advises to avoid sites where there are indications that the site will be unable to deliver a policy compliant development.

Previous planning applications have already identified protected wildlife living on these sites. That will complicate any compliance from an ecology point of view.

## <u>CS5</u>

Under this policy the Council must promote a sustainable integrated transport for the borough. As many residents are aware, local congestion is already at a critical level. This is before the completion of a number of other developments. Strawberry Fields Estate, on Hamble Lane at Lowford, Swanwick Lane, Bridge

<sup>&</sup>lt;sup>1</sup> As per Appendix 4 of the Core Strategy 2011

Road at Bursledon to give a few examples. It is acknowledged<sup>2</sup> by the Council that the connections at Junction 9, 10 and 11 of the M27 are identified to be above capacity at peak periods already. It should however be noted that this policy is dated 2011, and so the data will now be significantly outdated with even more traffic on the roads. It is also a known fact that the roundabout of Brook Lane, Headland Drive and Lockswood Road was nearing capacity in the 2016 and 2022 planning models. How can it then be claimed that the proposed development would have a negligible impact on the local highway network.

According to the 2011 Census<sup>3</sup> the number of cars has increased from 11 cars per 10 households in 2001, to 12 cars per 10 households in 2011. There is a general trend of more people owning more cars per household, and fewer households owning no cars.

On that basis therefore, a development of 700 houses will without doubt lead to an increase in the amount of traffic in the local area. This will be even more significant as the local public transport networks are far from ideal and so residents will be more reliant on their cars to get around.

Our roads are not built to take this volume of traffic. That's why they are called Brook LANE, Barnes LANE and Greenaway LANE.

There are no possible options for improving the roads to a standard capable of dealing with this level of increase in traffic. Only minor cosmetic changes are possible to the A27 and its junctions.

The dwellings currently being built from Swanwick Lane to Windhover Roundabout including Hamble Lane and Pylands Lane will also need to access the local roads & M27. The proposed developments in the plan will just add further to congestion. The local roads cannot cope with the current traffic so if the proposed numbers of houses are built it will lead to massive local congestion, which is evident by the long delays already at Brook Lane every morning/evening.

All of the local car parks are already overflowing, including the local shopping car parks, Swanwick railway station and Southampton Parkway station car parks. It also means taking the train is not a viable alternative.

Brook Lane is already an extremely busy road. Increasingly vehicles are regularly parked along the side of the road near Warsash Road end which restricts traffic flow as it is. Road filters and pedestrian crossings would ruin the character of the area. Furthermore I would argue that it is particularly dangerous for those coming out of Thornton Avenue/Crofton Way and turning right and Greenaway Lane turning right. Exiting the other nearby properties on Brook Lane will also become much more dangerous due to the increased traffic.

## CS<sub>6</sub>

<sup>&</sup>lt;sup>2</sup> Paragraph 4.64 of the Core Strategy

<sup>&</sup>lt;sup>3</sup>https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforenglandandwales/2012-12-11#car-or-van-availability

Again this policy reiterates that the priority for development will be for the reuse of previously developed land, taking into consideration biodiversity/potential community value, character, accessibility, infrastructure and services of the settlement.

As argued above, the site should not be seen as previously developed land. Furthermore the site has huge potential community value and as also mentioned above is home to a number of species of animals.

Infrastructure in the village would be a huge problem. The village just simply isn't set up for huge developments like this. There is a lack of local employment, lack of shops and services, and both primary and secondary schools are currently over subscribed. Doctors surgeries and dentists surgeries are also both over subscribed and have long waiting lists.

These sites will add nothing to the community infrastructure. Parking will be unallocated, meaning it will spill out onto our main roads. There is no provision for additional transport links in or out of the community, no provision for additional schools, doctors, or shops. This is a major flaw in the plan.

# **CS14**

This policy states that building on land outside the defined settlements will be strictly controlled to protect the countryside and coastline from development that would adversely affect its landscape, character, appearance and function. The development of 700 homes would be totally out of character for a small village like Warsash. It would ruin the quaint feel to the village and would overwhelm the limited existing amenities by bringing in so many new residents. This would be to the detriment of both existing residents and those proposed new residents. Properties should not be built in an area that does not have the facilities to support the residents.

It is identified <sup>4</sup> already that there are significant shortfalls of open space provision in this area. Such a development would only result in further removal of open space and would create a ribbon development between Warsash and Locks Heath that should remain two separate entities.

#### DSP6

In accordance with DSP6 there will be a presumption against new residential development outside of the defined urban settlement boundaries as identified on the Policies Map. It is clear that the proposed site is very clearly shaded in green that according to the key means it is an area outside of defined urban settlement. I cannot see how any of the permitted exceptions can apply in this case.

#### DSP15

<sup>&</sup>lt;sup>4</sup> Paragraph 6.43 of the Core Strategy

This policy states that planning permission for proposals resulting in a net increase in residential units may be permitted where 'in combination' effects of recreation on the Special Protection Areas are satisfactorily mitigated through the provision of a financial contribution. It is clear here that in the absence of a financial contribution or a legal agreement to secure such, the proposal would fail to provide satisfactory mitigation of the 'in combination' effects that the proposed increase in residential units on the site would cause through increased recreational disturbance on the Solent Coastal Special Protection Areas.

Developers should not be able to buy their way to planning permission. It should be noted here that one developer has already cut down a number of trees from this site, and an emergency tree preservation order has been put in place. It should however be noted that the site looks significantly different now.

Finally, it is also acknowledged<sup>5</sup> that the potential for prehistoric to iron age archaeology is low to medium and potential for post medieval and modern archaeology is high. This is another factor that should be taken into account.

National Planning Policy Framework

Section 2

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

Warsash could never be described as part of the Fareham town centre. The community is poorly serviced by public transport, and accessing the shops and nightlife in Fareham town centre is impossible without private transportation.

## Para 47

These sites may support family homes, but they are not sites that support the growth of children aged 6-10 or 11-15. I suspect most families moving into the area will need to travel out of the ward to access education, as neither Hook with Warsash nor Brookfield have the scope or ability to expand further. FBC have certainly not provided any evidence suggesting otherwise.

The homes being proposed I suspect, will not be priced at a level that the next generation will benefit. Instead, buy to let and an influx of new residents who are already able to purchase expensive properties will benefit.

How the development may affect parking and highway safety

Infrastructure is so inadequate in Warsash that the community has been told it can't have a much-required pedestrian crossing.

Brook lane is already extremely busy, and is the route many 11-16 year olds have to travel to get to Brookfield school.

<sup>&</sup>lt;sup>5</sup> In the Archaeological assessment

There have been several accidents involving pupils of Brookfield on Brook Lane. The latest happening only last week. Adding 700-1400 more vehicles to this already busy road at rush hour will simply increase the number of accidents involving children on their way to school.

Schooling is at near-full capacity, with no ability to expand, meaning any new families moving to the area will have to travel out of the ward for schooling - again increasing pressure on our roads.

Councillors admitted at the CAT that they believed it would be hard to expand local schools.

The ambulance service is not meeting its response time targets currently. Severely increasing numbers of residents, traffic and parking on inadequate roads making it impossible to access them, will seriously increase the chances of more accidents. Doctors are already under immense pressure, and are barely able to provide an adequate level of care as it is. Booking an appointment often means no availability for two months. How will our local health service cope with an influx of new patients?

#### Para 156

Developments proposed for these sites would not add to local character and distinctiveness. In fact, they would remove the last strategic gap between Warsash and neighbouring communities. It is unlikely future development applications would be able to change this.

The space is also too small to allow for the number of homes proposed and to provide the community resources FBC suggest they would need to see delivered.

'Should cumulatively and individually lessen the impact on traffic whilst delivering the new homes. Maximises opportunities for the cumulative highway impacts to be addressed'.

There is nothing about these proposed sites that would lessen the impact on traffic. There is no availability to increase access to the Western Wards, which is already the most difficult part of the borough the travel to and from.

I have not seen any evidence to support any of these statements. The infrastructure for transport is absent, and there is no scope available to improve this.

Likewise, this is the last piece of the landscape providing a strategic gap between Warsash and Sarisbury Green. Once this land has gone to housing, it is lost forever.

'Should "Minimise any detrimental impact to settlement definition/coalescence.'

This is the last space that keeps Warsash an individual settlement from Sarisbury Green. I would say that counts as a major detrimental impact.

'Should Consider any correspondence with key infrastructure providers such as education capacity or the ability to provide education provision (as an example)'.

I have seen no evidence that FBC have considered provision by other providers. At the CAT meeting in Warsash, I was left with the impression other service providers will do what they need to do, but there was no sign of a joined-up approach.

These sites will add nothing to the community infrastructure. There is no provision for additional transport links in or out of the community, no provision for additional schools, doctors, or shops. Parking will be unallocated, meaning it will spill out onto our main roads.

'Consider the accessibility of sites to services and shops to minimise the reliance on private vehicle use'.

These sites will hugely impact the accessibility of the whole village. As already stated, it will adversely and directly impact the children who have to travel to Brookfield School. It will also bring Warsash village to a standstill.

There are only two ways in and out of Warsash, and - unless FBC plan to build a bridge or a tunnel - this will not change. It is the most difficult corner of the borough to travel in and out of already without the additional housing.

Flooding and drainage

Flooding – This is a major risk for Brook & Greenaway Lane as the proposed site slopes towards both roads and is currently countryside, so absorbed. If this land it turned into housing the water that currently drains and will swamp both roads. Greenaway lane quickly fills with water following anything more than a shower of rain which is very slow to drain away.

How the development may affect neighbouring properties in terms of privacy, noise or overshadowing

To move from a village where the Greenfields are enjoyed by many, many local residents and with roads that were fit for purpose when built 20 years ago, to a densely populated area on a peninsula, will inevitably impact the look and feel of the area. There will be an increase in noise from the increased traffic and an increase in air pollution. It will no longer have an open airy feel to it.

It is identified <sup>6</sup> already that there are significant shortfalls of open space provision in this area. Such a development would only result in further removal of open space and would create a ribbon development between Warsash and Locks Heath that should remain two separate entities.

<sup>&</sup>lt;sup>6</sup> Paragraph 6.43 of the Core Strategy

Increased traffic of potentially 1600 additional cars on roads that are already stretched almost to their limit speaks for itself.

This will also be the case particularly as the local amenities are already over subscribed, so will mean that people will need to travel further to schools, doctors, dentists and other local amenities. This will add to the noise and pollution in the nearby area.

# **Alternatives**

Newlands Farm site is an alternative option. It was previously rejected for 2 reasons – landscape sensitivity and preserving the strategic gap

Landscape sensitivity: 20 years ago there was no need to build in gaps or countryside. Today we are no longer in that position

Newlands v Warsash: Is Newlands Farm landscape sensitivity more important than Warsash's traffic chaos?

Strategic gap: The Stubbington gap is huge. 700/800 extra homes here would preserve the gap and would be sustainable

Infrastructure: Newlands would benefit from the greatest roads investment and it is deliverable i.e. the new Stubbington by-pass passing through it.

I feel that this proposal has been prepared at speed and it is flawed! The strategy seem to be targeting Warsash and Porchester's greenfield sites and to be their easy option, however areas such as Fareham East and Crofton area around the new Stubbington bypass appears not to be on the agenda, which means that the strategy plan is not fairly spaced out.

Whilst I appreciate the task is not an easy one, there are many sites more suitable then Warsash including Newlands Farm. However I would recommend FBC should look at SHLAA Ref 3127 and the surrounding area of Fareham north and east of the town centre. This appears to be the prime location as it would have direct access to the motorway and easy access to the public transport links in Fareham town centre and three senior schools.

We may have to accept SOME of these homes in which case we should push for a retirement community of some sort. A landscaped retirement community would have the least Impact on all but existing health services but they might be persuaded to build a new health centre which they could sell to a new medical practice specialising in old people's needs and this would appeal to existing older residents in the village and it would also create a lot of new jobs for local Carers cleaners and taxi drivers as well as small gardeners and other tradesmen. Importantly it would also reduce the potential increase in traffic.

Another alternative is to look at a <u>completely</u> new area and develop a new town such as happened in Milton Keynes. The time and space will allow the entire necessary infrastructure to be built in from day one.

It may be unrealistic to hope for no development in Warsash and the Western Wards but it is not unreasonable to ask for a SUBSTANTIAL REDUCTION in the numbers.

Finally, the Planning Process: Objection Fatigue.

Warsash have been bombarded with planning applications recently, which have been objected to by residents only to find they have been suddenly withdrawn. Identical planning applications have then been submitted forcing residents to repeat their objection. This has caused confusion and served to wear some residents down, resulting in failure to object over again and providing a false representation of their views. As a result, residents are suffering from Objection Fatigue.

Now we are being invited to comment on the draft Local Plan but at the same time many individual planning applications are being submitted for commenting upon. Some of these do not reflect the proposals in Local Plan. Once again residents feel overwhelmed, bombarded and confused by this relentless attempt to impose changes to their lives.

It is clear there has been insufficient awareness raised of the proposed developments by FBC. Many residents are still simply not aware of what is being proposed but will, without a shadow of doubt be impacted by them. FBC have a requirement 'consult' local residents and the evidence to date is that they have not made sufficient efforts in respect of this.

The purpose of the campaign being run by a group of residents including myself is to raise awareness regardless of whether residents are in favour or not. The response has been overwhelmingly against the proposals. 4 weeks ago none of us really knew each other and now we have a FB page of over 2,000 people, a petition with nearly 2,500 people, a website, Twitter page, a crowd funding page and we organised a televised march featuring nearly 500 members of the community. This is the start of the campaign and we are in it for the long haul. FBC can expect a growing level of involvement from all residents over a sustained period of time.

Please do not feel this is a case of Nimbyism amongst Warsash residents. This wide spread strength of feeling and the fact that the vast majority of these people would accept some reasonable development proves that is not the case.

The FBC role description as stated on their website:

Surely it is easy to see there is real concern about the UNREASONABLE VOLUME of development, that is <u>nothing</u> like SENSIBLE being proposed. The complete lack of detail around improvements to the infrastructure is <u>not</u> EFFECTIVE planning.

For all of the above reasons, I strongly object to this proposal in the Draft Local Plan.

