

From: Planning Policy
Sent: 11 December 2017 12:56
To: Consultation
Subject: FW: Comments / Objection HA19- 399 – 409 Hunts Pond Road, Titchfield Common- 22 dwellin
Attachments: Letter of objection.docx



From: [REDACTED]
Sent: 11 December 2017 10:28
To: Planning Policy <planningpolicy@Fareham.Gov.UK>
Subject: FW: Comments / Objection HA19- 399 – 409 Hunts Pond Road, Titchfield Common- 22 dwellin



From: [REDACTED]
Sent: 09 December 2017 13:05
To: Development Management <devcontrol@fareham.gov.uk>
Subject: Re: Comments / Objection HA19- 399 – 409 Hunts Pond Road, Titchfield Common- 22 dwellin



Planning Strategy & Regeneration Department of Planning and Development
Fareham Borough Council Civic Offices,
Civic Way Fareham Hampshire PO16

1 December 2017

For the attention of case officer

Dear Sir / Madam

Reference: Objection to Planning Application based on contradiction of the NPPF and Draft Plan, and objections to provisions contained in the draft plan. My objections are presented separately for the NPPF and Draft Plan.

And are specifically objections to sites :

HA1 - North and South of Greenaway Lane, Warsash - 700 dwellings

HA3 - Southampton Road, Titchfield Common - 400 dwellings

HA7 - Warsash Maritime Academy, Warsash -100 dwellings

HA9 - Heath Road, Locks Heath- 71 dwellings

HA11- Raley Road, Locks Heath- 49 dwellings

HA13- Hunts Pond Road, Titchfield Common- 38 dwellings

HA14 -Genesis Community Youth Centre, Locks Heath - 35 dwellings

HA15 -Beacon Bottom West, Park Gate -30 dwellings

HA17 -69 Botley Road, Park Gate -24 dwellings

HA19- 399 – 409 Hunts Pond Road, Titchfield Common- 22 dwellings

I write in connection with the above planning application. I have examined the plans and I know the sites well. I looked at EV13 (Background Paper: HOUSING SITE SELECTION), which states:

"The purpose of this paper is to explain, in broad terms, the processes undertaken to inform the selection of housing sites for the Draft Fareham Local Plan 2036" (Draft Plan)"

I have also read through the referenced paragraphs from the "National Planning Policy Framework" (NPPF). I have experience of financing provision of sustainable residential communities in other areas of the country with their own acute issues.

Based on the above research and experience, I object strongly to the development of these houses in the identified locations. These sites generally, and HA 1,3 and 7 specifically, are in contradiction of both the "NPPF" and the "Draft Plan".

It is certain that the local communities and the Fareham borough do need provision of additional **sustainable** development of various infrastructures including more residential accommodation. Unfortunately the sites identified in this Draft Plan plan fails to deliver a sustainable solution in certain of its discrete communities and lets down those communities represented. With respect to the Draft Plan

Objection : I don't believe that the sites proposed adequately address the needs recognised in H2: Provision of Affordable Housing and I don't believe that Sites such as HA1,3 & 7 have considered adequately aspects of Policy H4: where Adaptable and Accessible Dwellings Development proposals for all new dwellings shall provide: I do not argue that it has been ignored, but that minimum lip service has been paid to the extent that the provisions noted entirely fail to achieve the goals intended for H4.

a) **at least** 15% of all new dwellings at Category 2 standard; and b) on schemes of over 100 dwellings (gross), at least 2% of private housing and 5% of affordable housing, shall be provided as wheelchair accessible Category 3 properties. Schemes exclusively for flatted development will be expected to comply with the criteria as much as is physically possible before lifts would be a requirement"

Objection: I object to the revisions of H4 identified in the Draft Plan.

Further with respect to HA 1,3&7 it appears that H4 does not adequately reflect the requirement that *" Further new older person and specialist accommodation will be required during the Local Plan period. Such provision can help people to downsize and free up family dwellings for others. The precise amount and type of specialist and older person accommodation required will depend on a range of factors including the choices of individual people and households.(of which I see no reference in HA1,3 or 7) Evidence in the Housing Evidence Overview Paper (2017) outlines some of this need which, where possible, has been addressed through specific allocations included in this plan and provision to be provided at Welborne"* Further accommodation to address identified need would be acceptable in principle subject to Policy H5".

Objection : I believe this fails to address the issues in the localities represented by the sites I have objected to, and specifically not in respect of HA1,3 and 7. This is in itself evident that FBC approach Warsash as a general dormitory and not as a discrete community as is required.

The Draft Plan is very Fareham central centric in the division of benefits and provision of the Sustainable aspects of the plan, unfortunately the surrounding community developments' including these to which I am objecting, do not bear the same level of attention to Sustainability Planning. The Warsash, Park Gate, Titchfield communities are discrete settlements where development proposals should be considered very carefully:

Objection : I believe that the Draft Plan and the sites I have specifically objected to fail in respect of Policy SP1: Presumption in Favour of Sustainable Development *"When considering development proposals, the Council will take a positive approach that reflects the "presumption in favour of sustainable development" contained in the National Planning Policy Framework. When appropriate the Council will work constructively with applicants to find solutions that enable proposals to be granted permission wherever possible, and to secure high quality development that improves the economic, social and environmental conditions in the area....."*

Objection : With respect to HA1 specifically, my objection includes the determination that the entire list of sites not only fails to address SP7 *"requirement to Create places that encourage healthy lifestyles and provide for the community through the provision of leisure and cultural facilities, recreation and open space and the opportunity to walk and cycle to destinations"* but goes as far as misleading in its reference to some open play area space and provision to cross the road which covers up an entirely inadequate provision in both cases and exacerbates the problems for cyclists and pedestrians, and relates to the road and safety of children walking or cycling to school. I find Appendix C: Draft Development Framework - Development Allocation HA1 (North & South of Greenaway Lane, Warsash) to be entirely unconvincing in respect of this and other areas of objection.

Objection : I note well and object to the Employment Policy section, there is No "E" for the communities represented in the site plans to which I object. No local employment issues are considered within those discreet community settlements, adding to the obvious conclusion that they are being considered as dormitory developments in contravention of key policies identified. I would be able to support site development proposals that are aimed at meeting identified settlement needs, of which there are many, but not those reflected by these sites in this Draft Plan.

Objection Draft Local Plan : I object also to E5, which protects Boatyard business except in the case where it can be represented as uneconomic. I object to the watering down of protection implied by this provision,

Key Strategic Priorities: Both the overall Draft Plan and the specific site proposals fail to meet a number of stated Key Strategic Priorities.

Objection : In respect to the references to settlement definition, this is then broadly disregarded or seemingly misrepresented in both plan and site descriptions. The needs of local business in the discrete communities so defined is ignored and only addressed as a general and seemingly Fareham central oriented manner.

Objections below can be read to note that they jointly and severally contribute to evidence that the Plan fails in satisfying KSP's 1,3 and 7 most specifically, but the other sites generally in respect of the site objections noted above.

1. Address the housing and employment needs by the end of the plan period in an appropriate and sustainable manner, creating places people want to live or where businesses want to locate.

2. In the first instance maximise development within the urban area and away from the valued landscapes and spaces that contribute to settlement definition **(SP 6 notwithstanding and particularly SP6 failure to address community definition in the communities affected by the sites specifically objected to in this submission)**

7. Create places that encourage healthy lifestyles and provide for the community through the provision of leisure and cultural facilities, recreation and open space and the opportunity to walk and cycle to destinations.

Sustainability Planning : (SP)

Objection : Entirely insufficient evidence or justification is contained within any of the above proposals with respect to the sustainability issues and benefits to the discrete communities that I have referenced. Passing references are made to lack of current provision in schooling and infrastructure, and requirements for the schemes to “contribute” to that development. However no integrated or sustainable accounting or plan is proposed that identifies the needs that should be critically planned to 2036 and costed accordingly.

For example the sites identified do not disclose the extent to which sites (or combinations of sites) can contribute to the site selection priorities / refining points within the plan itself. One specific example being **Selection Priorities / Refining Point 7**. I cannot find any evidence presented for the requirement that *they “Cumulatively and individually lessen the impact on traffic whilst delivering the new homes. Maximises opportunities for the cumulative highway impacts to be addressed”*. I note that a number of other Selection Priorities / Refining Points have not been properly addressed either.

- It is not possible to review the Draft Policy or Sites named herein and assess the suitability of any or all of them without this information. Both contain platitudes and broad intentions, but are very short on evidence of the work required to support the proposals.

- I suggest that the Policy and Site plan is a product of rushed work that does not benefit from appropriate review of :
- The discrete communities are not designed to be dormitory communities, the road and related services infrastructure is not planned or updated to meet such a purpose, yet the Draft Plan clearly treats these areas as if they were.
- Access to the A27 during morning rush hour is at a crisis point in terms of road congestion, and also (for example) offers a very high level of pollution along the main routes along which children walk and cycle to school.
 - I do not see any pollution studies for the locations related to the sites objected to. Much of the commentary under INFRASTRUCTURE in clauses 11 etc do not relate to these projects or communities. I believe 11.30 to be unobserved in relation to these sites or included in the Suitability planning, or the impact of health and safety on the community. I cannot support any planning that does not address with any specificity the health of the community. Fareham is presently in trouble for poor air quality due to the amount of rush hour traffic. Bring another 3000+ cars in to the already congested roads of the Western Wards and there will be more cases of asthma, lung disease and related illnesses
 - Local roads such as Brook Lane, Osborne Road, Warsash Road and Barnes Lane cannot be made wider, they were built to service the traffic and community of small villages and the resulting influx of 3000+ cars in such a small square area will lead to more accidents. Already there are black spots on Brook and Barnes lane where parking on bends and corners creates safety issues for cyclists.
 - Warsash specifically is on a peninsular and the only roads in and out are Brook Lane and Warsash Road. Emergency vehicles will be unable to ensure safe response times - during rush hour it is likely they will not have space to get to their destination. The roads are often double parked throughout the area and existing congestion is already a notable issue.
 - In specific cases, traffic in is already at a gridlock during peak hours and since the new Strawberry Fields, Hunts Pond and Coldeast developments it has doubled the time for people to get to work. There are no specific traffic studies presented within the plan to address or recognise the local issue, which is glossed over.

Objection : I believe the above to be in contravention of POLICY INF2: Sustainable Transport and in contravention in spirit of POLICY INF3 Road Network Improvements

- The nature of this site development plan overwhelms the communities. Neither the Draft Plan nor the specific site plans address the problems that it / they create in the context of these communities, or propose amelioration. The passing references to

contributing money to items such as school provision is cursory and evidence of a lack of knowledge rather than evidence of attention to material issues.

- For example I witness that children walking to Brookfield School already face a perilous journey due to the amount of traffic on Brook Lane

Permission should be refused for the site plans that I have referenced because the poor design fails to take the opportunities available for improving the character and quality of an area and the way it function.

It appears to me that if these sites paid more than lip service to the admirable intentions laid out in POLICY INF2 f). “ *Protects and where possible, enhances access to public rights of way, pedestrian links and cycle routes, in accordance with the Council’s Green Infrastructure Strategy and forthcoming Active Travel Strategy*; then the lay out would be very different. The opportunities to achieve some laudable solutions, particularly in HA 1.3 and 7, have been entirely ignored.

- Their absence is cause for my strong objection to these sites based upon the Draft Plan.

I now turn to my specific Objections based upon contradiction with the NPPF.

Section 2 of the NPPF, in particular paragraph 23, which states:

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. In drawing up Local Plans, local planning authorities should:

recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;

define a network and hierarchy of centres that is resilient to anticipated future economic changes;

define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;

promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;

retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;

allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in

full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;

allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;

set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;

recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and

where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

Objection : Warsash is very much not part of the town centre. The community is poorly serviced by public transport, and accessing the business or cultural aspects in Fareham town centre is near on impossible without private transportation, and effectively closed to vulnerable residents unless provided by diminishing community services.

Section 2 paragraph 47 in the NPPF, which states:

To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

Objection : These sites may support family homes, but they are not sites that support the growth of children aged 6-10 or 11-15. 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.

Objection. The Evidence Base is so generally lacking across the sites and particularly HA1,3 and 7, that this absence is a point all on its own.

Paragraph 156 in the NPPF, which states:

In determining planning applications, local planning authorities should take account of:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

the desirability of new development making a positive contribution to local character and distinctiveness.

Objection : Developments previously proposed for these sites have not been positive, and 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 like to see delivered.

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

Objection : 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.

"Avoids more sensitive landscapes"

Referencing pg 156 which states:

Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

the homes and jobs needed in the area;

the provision of retail, leisure and other commercial development;

the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

the provision of health, security, community and cultural infrastructure and other local facilities; and

climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Objection : There does not appear to be evidence that supports 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.

"Minimises 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.

Provide a sensible and logical urban extension with the ability to provide and maintain a defensible urban edge following development.

Objection: I have already raised this objection in respect of the drafty plan, but repeat again that these sites do not reinforce settlement identity in a sustainable manner.

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

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

Facilitates a diverse housing market with sites ranging in location and size (including housing supply in both the east and west Housing Market Areas of Fareham Borough).

Objection : Previous planning applications for plots in Warsash have tried to offset the developers' legal requirement to provide affordable housing by contributing financially to other developments. This allowed the developers to keep their applications relatively undiverse. This is specifically the case in HA 1,3 and 7. It is quite clear to local voters that these developments are being pursued by FBC partly because FBC know this will create expensive housing in a desirable area, with the objective of generating more revenue for FBC rather than meeting provisions of the NPPF.

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

Objection : again I have raised this objection in the Draft Ploan section above but repeat it again as part of the NPPF objection. These sites will hugely impact the accessibility of the

whole village. As I have 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. I believe this argument to be valid also for the Titchfield, Park Gate and other sites just as much.

There are only two ways in and out of Warsash, it is a Peninsular - 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. It would be very easy to redesign the sites with proper provision, and very desirable. The lack of it is so obviously wrong that it smacks of poor intent by FBC. **Personally I would be drawn to consider it negligent and even perhaps reckless planning.**

Consider whether the site will deliver any wider community infrastructure or benefits in addition to the basic policy requirements.

Objection : again referenced above under Draft Plan, but repeated, 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.

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

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

Recent planning history: The Sites to which I am objecting specifically have previous planning histories that are neither addressed and referenced in the draft plan, nor consistent in their application

Pressure for the development in the Warsash Village and other communities affected by these sites village is considerable, but has been successfully resisted in similar cases in recent years.

Alternatives: As an alternative to certain of these proposals and specifically HA1 & HA7, I would support the construction of specifically a lesser number of affordable and rent to buy accommodations and specialised assisted living facilities, in community planned and community friendly footprint, with integrated active transport solutions and environmentally friendly features in sympathy with the local flora and fauna. There is a considerable lack of that provision of any of those features in the discrete communities affected by the sites proposed. Those that are, such as “two football pitches” are understood now to be cheap tricks to garnish S106 provisions, but which are unattractive and unsustainable options on the location specified.

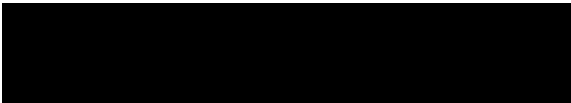
However a draft plan that addressed the specific infrastructure requirements and costs of ensuring sustainable community living, including safe roads and adequate provision of

schooling would need to be produced before such schemes can be properly outlined. The health (including Mental Health) and safety of local residents will need to be planned effectively rather than barely referenced.

A short disclaimer:

Finally, please note that my submission is in respect of the Draft Plan and the specifically referenced proposed development. Whilst I have taken every effort to present accurate information for your consideration, I cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Signature:

A solid black rectangular box used to redact the signature of the author.

