no enail



6 December 2017

Frincipal Planning Officer Fareham Borough Council Civic Offices, Civic Way Fareham PO16 7AZ

Dear

· A site proposed for development

\* Stubbington

· HAZ

## **OBJECTION IN RESPECT OF FAREHAM DRAFT LOCAL PLAN [FDLP]**

I am a district councillor for Anglesey Ward on Gosport Borough Council [GBC] and I sit on the GBC Regulatory Board.

The Regulatory Board discussed the FDLP on Wednesday evening and agreed a formal response from GBC which should be with you by now.

However, in addition to fully supporting that response, I wish to personally lodge the following objections as a Gosport resident in respect of the FDLP as I believe the FDLP consultation has been seriously flawed and failed to properly engage its neighbouring District Council with the result that some aspects of the plan are to the absolute detriment of the people of Gosport and are completely unacceptable.

Specifically, I wish to object to the proposals for compromising the Strategic Gap by virtue of HA2 and the inherent threat that the DFLP poses to the future waterfront development of Daedalus because of SP6.

## 1. The failure by Fareham Borough Council [FBC] to cooperate with GBC during the preparatory phase

The process adopted by FBC through the pre-publication phase of this FDLP is fundamentally flawed and did not include the statutory consultation required with GBC (and others). This is true for the DFLP overall but specifically in respect of FBC's proposals for HA2 and Daedalus.

In its Introduction the FDLP incorrectly states, at paragraph 1.24 "In preparing the Draft Fareham Local Plan 2036, the Council has complied with the relevant national and legal requirements applicable at this stage in plan preparation."

The proposals in relation to HA2 and Daedalus clearly have very significant implications for Gosport residents and its economy as a whole. This is in contravention of The Localism Act 2011 and The Town And Country Planning (Local Plans) (England) Regulations 2012, and also the plan-making directions of the NPPF (in particular paragraphs 178 - 181).

Indeed, it has been clear that there has been no engagement by FBC with GBC in connection with developing the FDLP despite the considerable implications that the FDLP has for Gosport. This is unacceptable and consideration should be given to withdrawing the FDLP to enable proper engagement with GBC to reach mutually beneficial proposals before placing the FDLP for the first phase of public consultation.

## 2. The HA2 proposal

- Strategic Gap The proposal to allow the building of up to 475 houses in the Strategic Gap is outrageous and would be to the severe detriment of Gosport and its residents. It also flies in the face of the Core Strategy within FBC current Local Plan (and the GBLP) and is inconsistent PUSH Policy 15 and the Planning Inspectorate review thereof of 2015, and also your own Fareham Landscape Assessment of 2017. I would also suggest that such a cavalier attitude to your own local planning policies will leave FBC at considerable risk of (another) future successful appeal from developers should they seek to develop an area in contravention of your policies if they can show that FBC itself has scant regard for its own LP..
- <u>Infrastructure</u> The proposal makes virtually no provision for the essential infrastructure to support the future HA2 community, medical, and education needs but rather blandly states that these can be provided from the existing facilities within Gosport which would border this scheme. These facilities are already under considerable pressure meeting the rightful needs of Gosport residents and it is an egregious assumption by FBC that these additional requirements can be placed on these facilities without having discussed this with GBC.
- Roads and Access The failure to properly assess the road and transport infrastructure for this proposed development is also an example of the fundamental flaws of FBC's approach. The initial DFLP had three access points including a proposal to demolish some houses in Tukes Avenue but without having notified either the owners of these properties or GBC! This access point proposal has now been withdrawn and it is understood that no replacement access point is being sought, reducing the proposed access points to the scheme to two which must threaten its sustainability (and particularly as many the Gosport infrastructure facilities which the DFLP seeks to use would have been accessed by that thoroughfare). Further, it is surely unacceptable that the version of the DSFLP on which the public are being asked to comment does not show this revision to the Plan.
- FBC is already the subject of a censure because of the unacceptable air quality at the Air
  Quality Management Area at the North end of Newgate Lane and Gosport Road and has to
  develop an a plan to mitigate this by March 2018 which then has to be deliverable within 2

years. The superimposition of this development would simply add to that environmental burden and is completely unacceptable.

3. <u>Daedalus</u> Clearly FBC must understand the importance of the Daedalus Waterfront area and the parts of the Daedalus that lies within the GBC boundaries, but the FDLP effectively ignores this and has the potential to adversely impact development of those areas. Perhaps what is saddest about the totally parochial apprioach by FBC that this DFLP demonstrates is that we are in danger of missing the opportunity to address the strategic cross-boundary matters of the site and align our two Local Plans and policies to best support developments and opportunities to the benefit of the residents of both Gosport and Fareham.

I firmly believe that with goodwill and a commitment to consult and work together, that we can help ensure that the FLP will be a fit for purpose, legally compliant document which will help deliver future development to the benefit of both of our communities. However, the current DFLP has not been devised in that manner and is currently unacceptable.

**Yours Sincerely** 

"Chapter or policy in the DLP

· Strategic Policies

· SP6