

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 December 2017 12:47  
**To:** Consultation  
**Cc:** Jolley, Richard; Evans, Cllr. K  
**Subject:** Objection to Fareham Draft Local Plan  
**Attachments:** AMH Objection to Fareham Draft Local Plan.docx

I set out my objection to the Draft Local Plan below but have also attached a word copy for ease of copying, if necessary.

I chose not to use your standard form as I found it constraining.

I have copied in Councillor Evans and Richard Jolley to ensure that the objection is noted and recorded.

Although not a resident of the Borough I have an interest in that my son and grandsons live in Romsey Avenue and as previous Head Of Street Scene for the Borough I know it well.

I have given my full details at the end of this email

[REDACTED]

## Objection to Fareham Draft Local Plan

### Introduction

I wish to register my objection to the current draft local plan in the very strongest terms, and in particular the inclusion of the Romsey Avenue site as a site for development, which I believe will have an adverse effect on my grandchildren who live in the road.

It would appear that Fareham BC have failed in their strategic planning function and as a consequence have left themselves open to developers building in a random fashion across the Borough as a result of the Cranleigh Road decision and their failure to ensure an sufficient supply of housing by their failure to deliver the Welborne development. As a result they have rushed into producing an ill thought out draft local plan which does not meet the principle requirements of the National Planning Policy Framework (NPPF). More importantly they are failing to protect the quality of life and safety of their residents through this poor planning.

### The Strategic Process

The draft plan process that the Council have put in place fails on a number of grounds:

- It fails to be accessible to local residents – a principle requirement of the NPPF:
  - Over 60 documents full of jargon with much cross referencing.
  - Absence of the SHLAA report – the most important document to the process - even when Councillors agreed the draft it was not in finished form and there was significant delay in making it accessible to the public.
- It lacks transparency in the underlying reasoning behind some of the proposed decisions.
- It is a draft plan prepared under time pressure to disguise the failings of the planning process.
- It will be found out at the inquiry stage and rejected

### Development Strategy

A major failing of the Council is in how it has failed to demonstrate how it meet an appropriate share of the housing need in its housing market area, mainly due to its failure to proceed with the Welborne development. Following the Cranleigh Road decision there appears to have been a major turn round in policy:

- In 2011 its own Core Strategy set one if it's "Strategic Objectives" as being ***"To deliver the South Hampshire Strategy in a sustainable way, focusing development in the Fareham SDA north of Fareham and Western Wards"*** and also stated that ***"the Council does not expect***



***Portchester to play a significant role in providing further planning provision over the plan period”***

- At the same time the then SHLAA identifies Portchester as being capable of providing limited housing development (around 60 dwellings). We are now looking at 10 times that number
- The Cranleigh Road site was considered significant for over 30 years and was defended by the council for all that time, until unlocked by a technicality in poor strategic planning by FBC.
- The headline strategies recommended in the Urban Edge document that did not develop Romsey Avenue relied on defending the Cranleigh Road Site.
- It would seem from this that Romsey Avenue is not being considered under its own merits, but is being based on a previous decision.
- This is not sound planning, the sites are different, with different designations and attributes and should be considered on those alone.

**Sustainable Development**

The NPPF talks about sustainable development, and not making our world worse for future generations. It talks about improving our environment and how important that is for our wellbeing.

As the grandfather to two young children who live in Romsey Avenue and attend Wicor school, I feel that draft plan fails in a number of respects in relation to sustainable development:

- The Cranleigh Road Meadow has already fallen to development due to the Council failing to ensure sufficient housing supply and this was extremely upsetting for my grandchildren as well as their parents and other local residents.
- The development of the Cranleigh Road, the Romsey Avenue site and other sites in Portchester will increase traffic significantly in what is an already congested area and lead to concerns about children’s safety on the way to Wicor School or Cams Hill
- There seems to have been little consideration of the 3 pillars of sustainable development – Economic, Social, Environmental
- Very little consideration seems to have given to infrastructure needs in Health, Education or transport with elected members suggesting that it is not their concern and a matter for other authorities – this is plain nonsense as the NPPF requires them to take account of these factors.

**Agricultural Land**

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

The draft plan fails again on this issue:

- The site at Romsey Avenue is identified as 46% ALC Grade 1 and 54% ALC Grade 2 in the SHLAA report.
- The sites have been farmed for over 40 years
- There is only just over 5% of Grade 1 and 2 agricultural lands in Hampshire.
- Other sites of lesser quality agricultural land in the Borough have been excluded
- This would be in direct contravention of the NPPF and would again fail on inquiry.

**Wildlife Conservation and Environmental**

Paragraph 113 of the NPPF 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 sites will be judged”. The draft plan fails again on this issue:

- The site at Romsey Avenue is close to an Special Protection Area for birds and considered as important by Natural England as foraging grounds
- Although the site at Romsey Avenue is designated as “uncertain” for Brent Geese, residents have photographed Brent Geese on the site in 2017.
- In spite of its proximity to water and being an area of flat land identified as important criteria in the Brent Geese and Wader Strategy of 2010 the Romsey site is the closest site to the water to be labelled “uncertain”, yet it has been preferred for development over other “uncertain” sites which according to the strategy are less important
- The Habitats Regulations Assessment for the Fareham Borough Local Plan 2036, identifies both the Romsey and Cranleigh sites in section 6 as likely to have significant impacts on the ecology and



environment if there is development on these sites – there are only 5 sites in total from the entire plan that are mentioned in this context.

### **Recreation**

Paragraph 73 of the NPPF 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”

Portchester has been identified in the previous core strategy as one of the parts of the Borough having a shortage of public open space. The provision of an additional 700 houses does not address this problem and surely the draft local plan should be looking at how adequate public space could be provided in the area, not removing open space.

### **Highways and Transport**

The Core Strategy 2011 states that “Fareham Borough has good access to the M27 however there are high levels of local congestion around the motorway junctions and well as along the A27 and A32/B3385 to Gosport”. The Fareham Draft Local Plan to 2036 states in its Key Strategic Priorities, point 4 “ensure Infrastructure is planned prior to development”.

The current situation is poor:

- Portchester has not had any major road improvements or developments in over 40 years.
- There is already massive congestion at the Delme and Dore Avenue Roundabouts,
- With up to 2000 more cars because of the earmarked developments for Portchester this is going to be even worse.

The Romsey Avenue site in particular does not have adequate access. The interim transport assessment by Atkins 2017 identifies several areas for concern.

- Residential streets never designed to take that level of traffic, estimated at 900 movements a day and over 100 during the business clock hour.
- The single proposed in / out access for the entire site, is currently a “stub end” farm access was not designed for weight of traffic it would need to carry.
- Parking along this road will make it unsustainable as the main point of access.
- On-road parking effectively making the access along Beaulieu and Romsey Avenue dogleg single traffic.
- The movements of School Children west to east to Wicor and east to west to Cams will be in conflict with what will become 2 very heavy junctions.

It is insufficient for the Council to say that this is a matter for the County Council, if the Council include this site in their local plan they must identify proper measures to deal with these problems.

### **Air Quality in Portchester**

Local authorities have an obligation through Local Air Quality Management (LAQM) regime to review and assess the air quality in their areas. The local authority also have an obligation under the NPPF to ensure that new or existing development is not put at risk from air pollution.

There is limited current information about the air quality in the Portchester area, there in fact appears to be no on-going monitoring in Portchester and no publicised reports for NO<sub>2</sub> and the nearest monitoring station for the more dangerous PM<sub>2.5</sub> particle is in Southampton!

The lack of highway infrastructure planning on the Romsey Avenue site will lead to lots of stationary traffic and high levels of pollution. The Council should, as a minimum, be establishing a baseline for pollution in the area and modelling the likely impacts of the development

### **Education and Healthcare in Portchester**

The Council seems to believe that Education and Healthcare are solely a matter for the County Council and the NHS. If they are to meet their planning responsibilities in respect of sustainable development these issues need to be part of their considerations and they need to know how they are going to be met.

Schools and GP surgeries in the Portchester area are already oversubscribed. The 700 additional homes in Portchester are likely to result in 240 primary school and 120 secondary school places. No information is available on the GP needs but 700 homes will generate at 2000 additional patients to be accommodated within an already stretched service.

There would appear to be nothing in the local plan addressing these issues.

### **Alternatives to Romsey Avenue**

The process of considering alternatives to Romsey Avenue would appear to fall in a number of areas:

- Those already in the plan that have been considered and rejected on the basis of a Sequential Testing process that has not been carried out correctly giving priority to rejecting sites that do not have the same issues as Romsey Avenue. Others have identified these specific sites.
- Those currently not in the plan but should be further considered – this includes the Newlands Farm site although in the strategic gap is adjacent to the new road and has all the infrastructure considerations that the Portchester sites lack.
- More imaginative solutions such as the Down End Road sites (3009 and 3127) which could be accessed via a link off the M27 roundabout and provide 1400 homes in Portchester.
- Reducing the number of homes required by the Plan. Fareham's population is projected to grow to 130000 from 115000 by 2037, but the Plan is predicated on 11000 new homes – are nearly all of these to be single occupancy.
- Developing higher yield sites and focussing on smaller developments as set out in the recent Budget statement. Romsey Avenue seems to fail on both these counts.

The Council needs to rethink its approach to new homes in the Borough.

### Conclusions

It is clear that the draft local plan has been put together hastily as a result of the need to respond to the Cranleigh Road decision which in itself was a result of a failure on the part of Fareham BC to deliver on its own previous draft plan and housing requirements.

As a result the plan is poorly thought out, does not meet the NPPF and in particular does not meet the principles of sustainable development. More importantly it fails to meet and protect the needs in respect of quality of life of its residents and in particular my grandsons who live in Romsey Avenue.

In the circumstances I would suggest that the Council withdraw the draft for further consideration and at the very least remove Romsey Avenue from its development proposals.

Date 08 December 2017

Best wishes

Environmental Health and Waste Management Consultant

Director  
Environmental Health Matters Ltd  
[www.ehms.co.uk](http://www.ehms.co.uk)

Trustee, Chartered Institute of Environmental Health



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