

Lee-on-the-Solent Residents' Association

Mr M Wyatt
Principal Planning Officer
Fareham Borough Council
Civic Offices, Civic Way
Fareham. PO16 7AZ

1 December 2017

Dear Mr Wyatt,

Draft Fareham Local Plan 2036 – HA2 Proposal – Formal Objection

1. The Lee Resident's Association(LRA) supports the general provisions of the Draft Fareham Borough Councils(FBC) 2036 Local Plan(DFLP) in particular the statements of Development Strategy at para 3.15 and its recognition of NPPF guidelines but wishes to register a formal objection to the proposal of the Housing Allocation HA2, Newgate Lane South.

2. The LRA's objection to the housing development HA2 is on the grounds that it contravenes Fareham's own DFLP as follows:

2.1. SP6 – Development in Strategic Gaps Policy that specifies that:

“Development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements.” This is equally valid under the current Local Plan where it is contrary to the Policy C22 as detailed later.

2.2 CF1 - Development proposals for new or extended community and leisure facilities within the urban area boundary, will be permitted where they:

“c) Do not have a severe adverse impact on the strategic and/or local road network”

It is unequivocal that HS2 will have a severe detrimental impact on the surrounding road network, roads already formally recorded as over capacity at peak periods.

2.3. INF2 - Infrastructure, Sustainable Transport (highway network issues) – Development strategy that should reduce the need to travel by motor vehicle through the promotion of sustainable and active travel modes. The development HA2 would completely contravene these sub-paragraphs of the policy:

“a) Integrates into existing transport networks; and

b) Does not demonstrate a severe cumulative impact (causing demonstrable harm) on the operation, safety or accessibility to the local or strategic highway networks; and

d) Fully exploits network improvements which encourage the use of sustainable; and active transport modes, through the provision of connections to the existing infrastructure, or provision of new infrastructure through physical works or funding; and

e) Mitigates impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development on the network, through provision of improvements and enhancements to the existing network to accommodate additional traffic, or contributions towards necessary or relevant transport improvements”.

2.4. INF2 – Infrastructure, Sustainable Transport (air quality issues) – Development strategy that should reduce the need to travel by motor vehicle through the promotion of sustainable and active travel modes. The development HA2 would completely contravene these sub-paragraphs:

“g) Positively contributes to the delivery of the Council’s Air Quality Action Plan by mitigating the effects of development on air quality within Air Quality Management Areas (AQMAs); and

h) Demonstrates good practice and principles of design, minimising emissions and contributing to the reduction of transport impacts on local air quality.”

3. The HA2 housing allocation is also considered inappropriate development that will not only severely undermine the above stated policies it also contravenes NPPF guidelines, a prior Planning Inspectorate ruling and will cause demonstrable harm to the local community. The principal factors that denigrate the HA2 housing proposal are:

3.1 Complete disregard of Fareham current Policy CS22 governing Strategic Gaps established and agreed with other local authorities. Fareham’s own plan states

“development proposal will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of settlements”.

This policy ruling was further supported by the Planning Inspectorate judgement on the current plan concluding that

“the proposed road improvements would not justify a revision of the [SG] boundary”.

Without question HA2 will seriously harm the physical and visual benefits of the Fareham/Lee-on-the-Solent strategic gap at one of the narrowest points, already compromised by transport routes and IFA2.

3.2. HA2 will seriously undermine the principle for the construction of the Newgate Lane South relief road, currently designed as a single carriageway to afford un-encumbered traffic flows. It was not intended to service a new large housing development. The recently notified reduction to two access points for this large development is clearly insufficient. Being on opposite sides of the site the access roads will create a new and congested “rat-run” from Rowner housing onto the Newgate Lane relief road. Any additional junctions will just prove the already widely held view that HCC has just funded a relief road that Fareham has exploited to support a housing estate.

3.3. As HA2 is a large development that can only be serviced by road transport it will significantly increase road congestion and pollution in the already over capacity Newgate Lane, A27 and Lower Quay feeder routes. It will also compound existing congestion on roads serving the Fareham/Stubbington/Gosport peninsular. Since any alternative forms of transport can only be buses these will further aggravate congestion and pollution concerns.

3.4. The additional traffic congestion will impact on the success and further development of the Daedalus Economic Zone and further denigrate the quality of life for all those living south of proposed development site.

3.5 Fareham's own Infrastructure Proposals in the DFLP identifies the Gosport Road as an area requiring changes to comply with air quality standards. The HA2 proposal will further aggregate FBC's duty to meet air quality standards with significant increases in traffic through the construction phase and thereafter as all residential traffic will have to pass through the current pollution hot spots.

3.6. The HA2 housing proposal does not address any of the current acute shortages in school places, health support, utility provision in the development area. These requirements will thus be borne by the adjacent community, a community that is served by Gosport Borough Council, not the proposing authority Fareham. It demonstrates a complete disregard for the requirements to co-operate with neighbouring Councils under the Localism Act 2011. This oversight is morally indefensible.

4. A further concern is that the DFLP mentions Daedalus site has the potential for further development, some of which is also in the Strategic Gap. Any further development in the Fareham/Stubbington/Lee-on-the-Solent strategic gap, an area already blighted by the IFA2 plan, will raise further concerns.

5. The LRA fully supports GBC response to the DFLP 2036 which amplifies many of the concerns outlined above and sincerely hopes this objection against the HA2 proposal leads to its removal from your 2036 Local Plan.

For: Lee Resident's Association