

APPENDIX F:

Comments received during the publicity period on Warsash's Neighbourhood Area Application
It makes sense for the Area to follow the Fareham Borough Council Ward boundary as both FBC and Office of National Statistics data will be aligned to these borders. This will enable the forum to generate a Neighbourhood Plan rooted in agreed data.
I support the proposed Neighbourhood Area that is the Ward boundary for Warsash that allows the prospective Forum and local authority to use ONS and other readily available statistical data to formulate plans for the future of Warsash and Hook.
Fully support the area map
I agree with the area boundaries
Seems appropriate.
The neighbourhood is correct and well represented
Encompasses a good area
The area seems right
As residents of such a beautiful place to live and being caretakers for the generations to come we must take this opportunity to have a say in the future development of our area with regards to working with the council and other organisations on housing, education, transport, protecting our environment etc while keeping our identity.
The area makes sense as it is the geographical area of Warsash
I am happy with it as per the proposal.

I think that this covers the Warsash area satisfactory. This appears appropriate.
Very much needed
As a resident of Warsash Ward I agree
I would consider the area drawn out to be correct
I agree with the proposed area.
It appears to cover Warsash
Fully support
Seems ok
looks right to me
The area is fine and covers what mostly impacts Warsash residents.
I agree with it
I agree with the proposed neighbourhood area
The area needs to be revamped and a plan would be a good course of action
I agree with the proposed area.
It's an appropriate area as it has the same boundary as the ward boundary
It should go all the way up to the m27
I have lived in the village 45 years and the proposed neighbourhood area shows just how important it is to keep the nature of the village and its surrounding area as peaceful as possible.
Agree

Warsash village simple.
This looks to accurately reflect the Warsash community
Always an interesting question of where to draw the line. Reminds me of when Warsash boundary was considered to be a particular bump in the road on Brook lane.
I agree with the proposed neighbourhood area
warsash, was a village, now just part of western ward
I support the area proposed
The proposed area seems right to me
I fully support the application.
The proposed area seems an appropriate area for the coverage of the Neighbourhood Plan.
Completely agree, we live just outside but can see a benefit for the whole community
the area is correct and covers the current and historical boundaries of the ward of warsash.
The proposed area that the Warsash neighbourhood Forum encompasses is appropriate.
The area makes complete sense and I have no objections.
I have looked at the proposed area map that will be covered by the neighbourhood forum and agree.
I agree, and it has my full backing
Looks good to me.
too much development is changing this area for the worse
Restricted to actual warsash and not surrounding areas
Warsash is on the western border of the large Borough of Fareham. The proposed Neighbourhood Area is often neglected with planning

considerations, public transport, and health and education provisions often to the benefit of property developers.

Accurate

This forum is needed. [REDACTED]
[REDACTED]
[REDACTED]

Agree

Warsash is a small village with only two roads exiting it. The west and south are bounded by water so any additional building of any type must be carefully monitored to ensure overpopulation does not occur. It is also an area of outstanding beauty and must be protected.

Glad to see that it includes Hook & Chilling

This covers the most affected area and encompasses the main proposals and as such is good but we need to consider outside this area too

I fully support these plans, an excellent idea and very welcome to all of the local people.

It looks good.

I feel that residents have not been consulted sufficiently or listened to regarding the huge amounts of over development proposed in the Western Wards. Warsash has suffered particularly badly. I hope the Neighbourhood Forum will provide a voice for the residents in the future. Unfortunately, this plan is too late to help fight the overdevelopment for Warsash.

Warsash area - excellent
The FBC and ONS data is grouped into Ward areas and by designating Warsash Ward as the Forum Area the Forum is able to utilise formally approved and agreed data that it can then analyse and consider when developing its Neighbourhood Plan.
The FBC and ONS data is grouped into Ward areas and by designating Warsash Ward as the Forum Area the Forum is able to utilise formally approved and agreed data that it can then analyse and consider when developing its Neighbourhood Plan.
I agree that the Warsash ward is the appropriate coverage area for the forum.
It is vital to the integrity of village life and the well being of the community that a cohesive plan is respected and allowed to go forward
The proposed area covers a range of habitats from woods, fields, river frontage, beach, wet lands, allotments, parks, housing and commercial - making up Warsash
Excellent idea
Area over populated now with way too much traffic. Wildlife and air quality has been affected and people are living like sardines I think that the demised area, as shown on the map, is representative of the affected residents and businesses. The area reflects the boundaries of the complete Warsash ward which in my view makes perfect sense.
I feel this is reasonable

Great work
The area covered seems appropriate.
. Warsash needs to be represented by the local people for the local people
Seems fine
Seems logical to me.
The area seems to include economic environmental and residential areas which have been affected by poor decisions in the past
The area looks good to me.
The area covered makes sense.
To be advised.
<p>(Representation Page 1) The Warsash Neighbourhood Forum Consultation: I would like to comment upon the application to designate the Warsash Neighbourhood Forum (WNF) and it's proposed area. My representation is split into two sections.</p> <p>Section1 Part A) An assessment of the Warsash Neighbourhood Forums application with regard to the statutory requirements. Part B) An assessment of the Warsash Neighbourhood Area application with regard to the statutory requirements.</p> <p>Section 2 In this section two elements of the factual and policy matrix are considered. Element 1:National Planning Practice Guidance (NPPG) paragraph 033 Reference ID: 41-033-20140306 Element 2:The character of the proposed Neighbourhood Area Conclusion & Recommendation: Logical deductions are drawn and a recommendation to modify the proposed boundary is subsequently given.</p> <p>SECTION 1:The Warsash Neighbourhood Forum Consultation: (Assessment of the Warsash Neighbourhood Forum application against statutory requirements)</p> <p>Part A:Neighbourhood forum requirements Neighbourhood Forum Requirements under the Neighbourhood Planning Regulations 2012 and Town and Country Planning Act 1990</p> <p>1) There is not already a designated neighbourhood forum for the area proposed and the area does not include the whole or part of the area of a parish council. Complied With: YES</p>

- 2) Name of the proposed Neighbourhood Forum Complied With: YES
- 3) The forum has a written constitution and a copy is provided. Complied With: YES
- 4) The name of the neighbourhood area to which the application relates and a map which identifies the area. Complied With: YES
- 5) The contact details of at least one member Complied With: YES
- 6) A statement to show the proposed forum is established for the express purpose of promoting or improving the social, economic and environmental well-being of an area that consists of or includes the neighbourhood area concerned. Complied With: YES (See Constitution)
- 7) A statement to show its membership must be open to individuals who live or work in the neighbourhood area or who are elected members in the borough. Complied With: YES (See Constitution)
- 8) A statement to show its membership includes a minimum of 21 individuals. Complied With: YES

REASON: A list of at least 21 names and associated statuses (i.e. resident, worker, councillor) was attached to the application but; "Due to data protection regulations, the Council cannot publish the list of members, but can confirm it has received a list which satisfies the requirement." Source: Fareham Borough Council Website: <https://www.fareham.gov.uk/planning/warsashneighbourhoodplan.aspx> This statement by FBC confirms that data protection regulations legislation (the GDPR) does not allow the names and addresses (in the form supplied) to be released directly into the public domain. However it should be noted that the GDPR does not apply to anonymised datasets and as such, in order to both inform and to encourage transparency throughout the entire process some information concerning this list could and should have been placed within the public domain. Question 1) I would therefore ask the Councils opinion as to whether they would consider in all future Neighbourhood Forum and Neighbourhood Area designation applications to publish the total number of names and totals for each of the statuses (resident, worker, councillor) together with an anonymised postcode map of the listed members, to help, aid and inform interested parties of the members general locations. In order to confirm this particular requirement I asked the Council to supply an anonymised dataset. After due deliberation and consultation with FBC's legal team the following anonymised information was released. SO31 7S - 1 forum member SO31 9J - 4 forum members PO14 4S - 2 forum members SO31 9G - 13 forum members SO31 9H - 6 forum members PO14 4L - 3 forum members SO31 9F - 1 forum member SO31 7B - 1 forum member SO31 7N - 1 forum member SO31 7D - 1 forum member SO31 9T - 1 forum member The information supplied to me in an anonymised form would appear to indicate 34 members on the list.

- 9) Each of whom: Lives in the area concerned; or Works in the area; or Is an elected member of the borough Council Complied With: UNKNOWN (probably satisfied) REASON: This is clearly intrinsically entwined within the argument as laid out in 8) above and as such can not at this stage be confirmed with precision as the information regarding the statuses of the members on the supplied list is not within the public domain. Hence the status of this part of the requirement is at present UNKNOWN but probably has been satisfied.
- 10) Whether it has secured or taken reasonable steps to attempt to secure that its membership includes at least one individual who lives, who works and is an elected member. Complied With: UNKNOWN (tending towards non compliance.)

REASON: I asked the Council the following question:- "Can you confirm that at least one of the Warsash ward members of FBC or the HCC

Warsash member is also a member of the Warsash Neighbourhood Forum (WNF) ?" Reply: The Council is not in a position to release detailed information on forum members due to GDPR regulations which is why the list is not on the website. The Forum themselves may be willing to release the information to you if you were to contact them directly. However, we can confirm that it complies with the statutory requirements, which do not require political representation (although members of a neighbourhood forum can also be elected members for a local authority). Response: This answer perplexes me somewhat as I would have thought that my asking of a question in relation to the elected members of FBC and HCC (who are public officials having their names, postal addresses together with their telephone numbers already within the public domain) would be withheld under the pretext of the GDPR. And I point out that my question required only a simple YES or a quick sentence to say that NONE are at present members. Or that Councillors have been approached but have presently declined full membership but will be working as co-opted members / associate members and advisors during the neighbourhood planning stages of the process. Question 2) It would be appreciated if the Council could give a reason for reference to the GDPR when the answer to my question (namely an anonymous number or a quick statement of intent) clearly falls outside of the remit of those regulations. I agree that the wording of the legislation is such that it is not a requirement for a Forum to have political representation although Government guidance would appear to encourage them to do so. In relation to the specific requirement, namely for a Forum to show whether it has secured or "taken reasonable steps" to secure it's membership includes at least one member from each of the grouping mentioned above. No information regarding their "reasonable steps" taken nor the publication of the securement of such members has been placed in the public domain. Therefore at present this part of the requirement can only be regarded as UNKNOWN tending towards non compliance. (Continued on Page 2)

(Representation Page 2) 11) Whether its membership is drawn from different places in the neighbourhood area and from different sections of the community in that area. Complied With: NO REASON: Further questioning regarding the locations of the members on the list led to the following information:- Total number of members on the list as supplied at the time of the application = 34 And these were such that: -
1) There are 31 forum members that live within the built up area of Warsash as defined by the adopted map.
2) Three members live outside the built up area but within either Warsash or Park Gate ward. 3) None of the Forum members with home addresses provided (Forum members can work in the area as well) live south of the Warsash urban boundary. Of the 34 members on the list 31 live within the urban area of Warsash (1) , 3 live outside this area and of these at least one is in the Park Gate Ward and at least one is in the Warsash Ward (2) . We know Mr Westcott is in Greenaway Lane (See Forum Application) & this is outside of the urban area of Warsash. Hence there can be at most one member on the list that is in the rural area south of the Warsash urban area boundary as defined on the adopted map and that this member is not resident there. (3) Hence the submitted list contains no members that are resident within the area south of the Warsash urban boundary on the adopted map. That is to say, there are NO residents from:- Hook Park, Cowes Lane or Solent Drive, The hamlet of Hook or the road network of Hook Park Rd, Workmans Lane, Chilling Lane or Hook Lane, Chilling or Solent Breezes Holiday Park or Abshot. However over 91% (31/34) of the members on the submitted list are resident within the Warsash urban area boundary as defined by the adopted map. And therefore I contend that the list is not representative of the whole of the proposed area for designation. In light of this I asked the Council the following:- "Have the Forum supplied details concerning their "attempts" to encourage membership from the rural area south of the Warsash urban area boundary, explaining exactly what they have done, for instance a local meeting in Hook or a leaflet drop to the

residencies in the rural area or maybe even God forbid having a prominent member of the Forum actually knock on doors to explain what the Warsash Neighbourhood Forum is all about ?" If they have why is this information not within the public domain as their "proactiveness" in showing compliance with the requirements of the act is an important factor in desirability is it not ?

Question 3) The Council declined twice to offer opinion on the above point and I cordially ask that the Council now give their opinion upon this. NOTE: If the Councils reply to the above is couched within the language of "intent", I point out that everyone may have an intent to do many things in their life, but the reality is that they never get round to doing them. And in this particular context because the constitution says that membership is "open to all" this does not mean that in reality this would occur. The onus is upon the Council within this part of the legislation to "have regard to the desirability" & satisfy themselves that "reasonable steps" were taken to obtain such membership from different locations and different demographic groupings from within the entire proposed area. In addition, the following question was also in my opinion left unanswered :- "It would be appreciated if you could describe the methodology you have used to "satisfy" yourselves that the condition specified in section 61F part 5 c) of the Town and Country Planning Act 1990 can be accurately verified." Reply: The Council has received a list with addresses and postcodes of at least 21 members of the Forum. Response: I was surprised by the non answer that I received, namely a restating of what the applicant supplied and not what I had asked; "What had the Council done to verify and satisfy itself that the supplied information is correct?" Once again I ask the following:-

Question 4) What has the Council done to verify and satisfy itself that the supplied information is correct ? It is unknown whether any information concerning the "demographic profiles" of the members on the submitted list was supplied at the time of the application or if further information was sort by FBC or whether this information has not been sort and therefore is unknown although the following statement from FBC ; "The information that the Forum have supplied in relation to their application is published as part of the application forms and their constitution." would appear to concede that the ONLY information supplied is that contained within either the application forms or the Forums attached constitution leading me to conclude that no demographic information has been supplied. I therefore contend that this part of the legislation requirements has NOT been seen to have been complied with and I ask; Question 5) With regards to 61 F 7a) TCPA 1990 has "desirability" been met ? (For comparison please see Titchfields exemplary application for designation, transparency of membership and explanation of why the boundary had been selected.) 12) Whether its purpose reflects (in general terms) the character of the neighbourhood area. Complied With: YES The stated aim of the Forum is; "To promote and or improve the social, economic and environmental well-being of the Warsash Area" This "catch all" statement would necessarily appear to apply to virtually all potential neighbourhood areas and therefore in "general terms" can be said to have complied with the requirements of the legislation. Part B: Neighbourhood area requirements: Neighbourhood Area Requirements under the Neighbourhood Planning Regulations 2012 and Town and Country Planning Act 1990 1) No overlap with another designated neighbourhood area and where a neighbourhood forum is the applicant, no overlap with the area of a parish council. Complied With: YES 2) A map which identifies the area to which the area application relates Complied With: YES 3) A statement explaining why the area is considered appropriate Complied With: NO REASON: The justification put forward by the WNF for the designation of the whole area in the application is not accepted as

being appropriate. (See Detailed Analysis of this in Section 2) 4) A statement that states that the relevant body making the area application is a relevant body for the purposes of section 61G of the Town and Country Planning Act 1990 Complied With: UNKNOWN REASON: The "relevant body" presumably is the Warsash Neighbourhood Forum, however at present they have not been formally designated as "the relevant body" so once again this part of the regulations can only be described as UNKNOWN at present. (Continued on Page 3)

(Representation Page 3) SECTION 2:The Warsash Neighbourhood Forum Consultation: I would strongly argue that for the rural areas of Hook, Chilling & Abshot it is far better to have ALL options open and viable rather than to leap into the dark with the WNF without knowing exactly what their policies may entail in the medium to long term. This I believe can be best achieved via a modification to the boundary of the proposed area for designation. One in which the rural area is separated from the urban area of Warsash. Thereby allowing the rural area the time it needs to properly consider it's preferred choice between remaining fully under the Local Planning Authority (LPA) with regards to it's non strategic policies in the emerging Fareham 2036 Plan and the emerging non strategic policies of the WNF neighbourhood plan. In order for this to occur I'd like to expand a line of argument regarding the Warsash Neighbourhood Forum (WNF) and it's proposed area for designation by noting that Fareham Borough Council as the LPA has discretion in determining the boundary of a neighbourhood area pursuant to section 61G of the Town and Country Planning Act 1990 as amended. Such discretion has been tested and confirmed by the Court of Appeal (see Daws Hill Neighbourhood Forum v Wycombe District Council 2014). <https://www.wycombe.gov.uk/uploads/public/documents/Planning/Neighbourhood-planning/Daws-Hill-v-Wycombe-DC-Final-Judgment.pdf> The judgments of the High Court and Court of Appeal in the Daws Hill litigation state that in determining an application under section 61G the LPA should have regard to a specific 'factual and policy matrix' that applies to that area and that; "The character of an area proposed for designation as a neighbourhood area is bound to be a relevant consideration when the local planning authority is deciding whether its designation as a neighbourhood area is appropriate." (Para. 23) On this basis and set within the context of national legislation and guidance, the following part of my representation sets out two of the component elements that should be addressed in assessing this application and gives the rationale for including these elements. An assessment against the factual and policy matrix and a conclusion is then drawn and a new boundary is proposed for consideration. Factual and policy matrix elements and rationale for selection:- Factual and policy matrix Element 1: National Planning Practice Guidance (NPPG) paragraph 033 Reference ID: 41-033-20140306 <https://www.gov.uk/guidance/neighbourhood-planning--2#the-role-of-the-local-planning-authority-in-neighbourhood-planning> Rationale for selection: Part of the National Planning Practice Guidance provides specific guidance on what could be considerations when deciding the boundaries of a neighbourhood area Element 2: The character of the proposed Neighbourhood Area Rationale for selection: Character is considered to be a key element of the factual and policy matrix due to its inclusion in the following elements of guidance: a) NPPF (Feb 2019) paragraphs 185 and 192 recognise the importance of new development making a positive contribution to local character. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf b) National Planning Practice Guidance paragraph 033 Reference ID: 41-033-20140306 sets out nine considerations for deciding the boundary of a neighbourhood area. Four of these relate to the physical character of an area. These are bullet points: 4. the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style 5 whether the area forms all or part of a coherent estate either for businesses or residents 7 whether infrastructure or physical features define a natural boundary, for example a major

road or railway line or waterway 8.the natural setting or features in an area. NOTE: The statement within the application by the WNF to designate the proposed area does not specifically address any of the considerations outlined above but does meet the requirements under the legislation to include a statement explaining why this area is considered appropriate to be designated as a neighbourhood area. Their statement simply states that it's the Warsash Neighbourhood Forums intent to produce a neighbourhood plan "rooted in correct data" and they go on to say; "The FBC and ONS data is grouped into Ward areas and by designating Warsash Ward as the Forum Area the Forum is able to utilise formally approved and agreed data that it can then analyse and consider when developing its Neighbourhood Plan." SOURCE: WNF's application to designate a Neighbourhood Area (Section 7 Statement) <https://www.fareham.gov.uk/PDF/planning/AppAreaNeighbourhoodForum.pdf> However with regards to area boundaries it should be noted that the National Planning Practice Guidance (paragraph 033 Reference ID: 41-033-20140306) <https://www.gov.uk/guidance/neighbourhood-planning--2#the-role-of-the-local-planning-authority-in-neighbourhood-planning> states that "Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area". This does not imply that an LPA must automatically take the proposed designated area to be the exact equivalent to the electoral ward boundary. The proposed area for designation can infact be any shape and any size. (Continued on Page 4)

(Representation Page 4) Assessment against Factual and Policy Matrix Element 1:National Planning Practice Guidance (NPPG) The National Planning Practice Guidance (paragraph 033 Reference ID: 41-033-20140306) sets out nine considerations that may be relevant for deciding the boundary of a neighbourhood area. The proposed neighbourhood area has been assessed against these considerations. This assessment is set out below:NPPG considerations & assessment 1: Village or settlement boundaries, which could reflect areas of planned expansion Such a consideration is not directly relevant to a built-up urban area. However, the proposed area in addition to the urban area of Warsash also contains four discrete, characteristically differing and historically separate areas of settlement specifically:-

- a) The hamlet of Hook a conservation area
- b) The Hook Park Estate & Cowes Lane / Solent Drive an area of exclusive detached residential properties
- c) The Solent Breezes Holiday Park a mobile home and chalet park containing both owner occupiers and holiday visitors and is such that any new planning permission will now be subject to limited occupancy conditions
- d)The Abshot area containing mixed residential (including Grade II listed buildings) / Health Club & Farming activities The main businesses lying outside of the Warsash urban area are those of Abshot comprising the predominantly arable farming activities of Barfoots of Botley together with the sports & leisure enterprise of The Abshot Country Club together with The Hopscotch Day Nursery which are within the same site. The horticultural business of Lowaters Nursery situated in Hook Lane and the restaurant "The Nook Eating House" located within the conservation area of hamlet of Hook. Substantial portions of the land bounding each of these settlement areas is already subject to numerous international, national and local protections:- Brent Geese & Wader sites (DSP 14), SPA/SCA/RAMSAR sites (CS4, DSP13, DSP15) ,CCMA sites (DSP16) Development Within Solent Breezes Holiday Park (DSP11), Historic Park and Garden (DSP 5) SSSI, LNR's and SINC's (CS4, DSP 13) (Note : The Development Sites & Policies (DSP) and Core Strategies (CS) in brackets taken from the current Interactive Policies Map) <https://farehamcouncil.maps.arcgis.com/apps/View/index.html?appid=ae4164647c3942b6a542e9a857009875> According to the Local Plan Part 2 "Development Sites and Policies" (Adopted June 2015) "4.3 The areas outside of the defined urban settlement boundaries (DUSBs), as

defined on the Policies Map, will be protected from inappropriate development. These areas include urban edge locations, settlements outside of the DUSBs and countryside areas..." <https://www.fareham.gov.uk/PDF/planning/LP2DSPAadopted.pdf> The approach as detailed in the adopted plan above concerning wider strategic proposals would appear to be consistent with the emerging Fareham 2036 plan https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlan2036_Consultationversion.pdf in which it is stated with regards to neighbourhood planning that; 1.30 "Any Neighbourhood Plans in Fareham Borough will need to conform with the policies of the Development Plan" (pg 7) Within section 2.7 of the draft Fareham 2036 Plan two of it's stated key strategic policies are:- 9. Protect and enhance the Borough's landscape features, valued landscape, bio diversity and the local, national and international nature designations 10. Appropriately manage and protect the Borough's historical assets including Conservation Areas, Listed Buildings and Scheduled Ancient Monuments.(pg 12) when taken together with paragraphs 4.31-4.34 of the same document namely:- Countryside Development

4.31 The countryside (i.e. areas outside of the defined Urban Area) provides many positive aspects. On one hand it provides settlement distinction which has in some cases been protected more specifically through the identification of a Strategic Gap. Secondly, and separate to the gap issue, the open countryside often contains valued landscapes that can be sensitive to change or development. There are further considerations such as agricultural land value that may also need to be considered.

4.32 A key Strategic Priority of the Draft Plan is to focus development within the existing urban area and within specific site allocations that have been determined taking into account their sustainable merits (individually and cumulatively) and which accord with the Development Strategy and other evidence which supports the Local Plan.

4.33 To support this approach, development outside of the urban areas will be carefully controlled as it is the intention to maintain the open nature of the Borough's countryside, much of which has landscape merit or functions to prevent settlement coalescence, and resist encroachment of development into non-urban areas.

4.34 Development outside of urban areas will be strictly controlled and will focus on meeting needs that can only be met in those locations such as agriculture, farm diversification, rural business and enterprise, countryside recreation, leisure and tourism. Where such development is necessary, the Council's priority will be to protect and enhance the landscape character, the setting of settlements and bio diversity and paragraphs

4.41-4.44 namely:- Residential Development in the Countryside 4.41 The Local Plan focuses development in the existing urban areas and on specific allocated sites. In order to maintain the quality of the countryside and ensure a sustainable approach to development, residential development outside of the urban area will be treated as being within the countryside. Those areas in the countryside are defined on the Policies Map. 4.42 The countryside can face a variety of development pressures. Therefore, the Local Plan seeks to apply strict control over residential development in the countryside to contribute towards meeting the wider aims of sustainability and to protect the countryside from inappropriate development. 4.43 Defining the urban area boundaries provides clarity for the application of these policies by providing a clear differentiation between the urban and countryside (or non-urban) locations. Urban area boundaries protect the integrity of the countryside, providing a compact form to settlements, preventing sprawl, sporadic development and reducing the visual impact on the countryside. 4.44

Whilst the Council seeks to protect countryside from inappropriate development(Policy SP5) it is recognised that there may be a need for residential development in the countryside in exceptional circumstances, where it can be demonstrated that a countryside location is both necessary and justified. In this location, the Council will seek to provide a focus on efficient use of existing buildings to meet need and set out other exceptions to development in the countryside, such as controlled 'in filling'. would appear to offer only very limited and highly regulated opportunity for expansion of the existing rural residential and/or businesses within the proposed area lying outside of the Warsash urban area and would be suitable only for such uses that are regarded as being appropriate to these areas as at present or in the case of residential development in "exceptional circumstances". Summary: There is little scope for development expansion of the existing settlement areas outside of the Warsash urban area under either the current adopted strategic policies or within the strategic policies of the emerging Fareham 2036 Plan. Therefore there would be no justification for the proposed neighbourhood area to include non-built up areas beyond the existing Warsash urban area. (Continued on Page 5)

(Representation Page 5)

2 The catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities The proposed area contains a number of each of these, but they are distinct and separate in their locale, the shops, schools, pubs and other public facilities being concentrated within the urban centre of Warsash which has it's major "green space/ nature area" (i.e. Warsash Common) being situated directly on it's urban boundary. Whereas the rural areas of Hook, Chilling and Abshot contain only very minimal public services other than those associated with recreational pursuits (walking, cycling & horse riding etc). With regard to Solent Breezes Holiday Park it has been noted by FBC that; "The mobile home and chalets are not suitable for permanent occupation as the site is not sustainable due to its location away from local services"

https://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DLP09_Draft_Policy_and_Supporting_Text_for_Solent_Breezes.pdf The distances involved to travel to any facilities by foot for the majority of the residents in the Hook Park Estate, hamlet of Hook, Abshot and especially Chilling (Solent Breezes Holiday Park), hereinafter known collectively as "the rural area", are such that they would be considered on the limits of reasonableness with regards walking to the facilities that are available in the urban Warsash area. Summary: This is a distinct difference with respect to the proposed area and the catchment / availability of local services, with the majority of local services being in the built-up area in the Warsash sector of the proposed area. Whereas facilities that are open to the public situated within the rural sector of the proposed area, are those activities predominantly of a recreational nature, whilst serving a local function, these also importantly have a much broader catchment area (as recognised in the supporting evidence document "Solent Recreation Mitigation Strategy" of the draft Fareham 2036 Plan, for example).

3 The area where formal or informal networks of community based groups operate There are a number of community based groups and residents associations within the Warsash area. The application material provides no detail as to the geographic extent of these, but by their nature (resident / community groups) it can be conjectured that the extent of their membership will be focused on the established residential areas. Summary: membership of formal or informal networks of community based groups in the area will be focused on residential areas but will have an interest in the wider area.

4 The physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style There are clear physical differences within the proposed neighbourhood area, namely a significant element of it, some three quarters is defined as countryside. (See the Interactive Policies Map) <https://farehamcouncil.maps.arcgis.com/apps/View/index.html?appid=ae4164647c3942b6a542e9a857009875> This is in stark contrast with the Warsash urban area within which, the scale and nature of development contains distinct differences namely in terms of residential / commercial buildings, and community facilities such as The Victory Hall . Whereas the only other defined urban area within the proposed area, namely that in and around the Hook Park Estate (comprising the adopted section of Hook Park Road, Cowes Lane & Solent Drive) are predominantly large detached residential dwellings. . Summary: The proposed area contains a clear separation into sectors of distinct characteristics- large continuous tracts of open countryside either being grazed or under arable farming usage or glasshouses used in horticulture together with four distinctly different small and highly constrained via strategic policies outside the remit of a neighbourhood plan (i.e. conservation area, various heritage and protected nature sites together with the separate and distinct policies regarding the Solent Breezes Holiday Park etc) These settlement areas are of differing nature, as previously described above and contrast with the main urban residential / business and institutional establishments associated with the Warsash urban area.

5 Whether the area forms all or part of a coherent estate either for businesses or residents The proposed area contains the coherent abate mixed usage Warsash urban area comprising the community developments of the Hook with Warsash Academy school and the Warsash Wasps Sports and Football Club, it's residential areas are mostly in discernable estates surrounding the old central core of the Warsash Clock Tower building with its associated shops, pubs and other businesses in Shore Road and Warsash Road together with the old waterfront pub "The Rising Sun" and the present Warsash Sailing Club building "Shore House" situated within The Warsash Conservation Area. The remainder of the proposed area, namely that outside of the Warsash urban area has been described previously. Summary: The urban sector of the proposed area contains residential estates with commercial / community facilities within these Warsash itself has it's old central core having at it's focus the Warsash Clock Tower and the older buildings of Shore Road and the waterfront forming part of the important historically significant Warsash Conservation Area. The Warsash urban area with regards to the remainder of the proposed area forms a coherent estate of mixed residential and commercial use. But clearly the whole of the proposed area does not form a coherent estate for obvious reasons that at least three quarters of the proposed area is defined as being an "area outside of defined urban settlement boundaries". (Continued on Page 6)

(Representation Page 6)

6 Whether the area is wholly or predominantly a business area The proposed area although containing businesses in both the urban Warsash area and the rural area can not be described as being wholly or predominantly a business area. Summary: The area proposed is predominantly rural with sparse residential and non residential areas which starkly contrast with the urban area of Warsash., thus demonstrating a clear difference between the two elements of the area but neither area could be described collectively or separately as being wholly or predominantly a business area.

7 Whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway The proposed area is bisected by the Hook Valley which lies to the south of Warsash and Locks Heath and forms a tributary of the Hamble, it's valley form and heavily wooded and natural character covers the floor and sides upstream of where the road crosses the valley below the Warsash Maritime

Academy. The valley 'system', including the minor tributaries that feed into the main valley and the land in between define the characteristic of this area as a whole forming a physical natural boundary between the urban area of Warsash and the rural area. Source: Fareham Landscape Assessment (EV40 Aug 2017 pg 68) https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV40-FarehamLandscapeAssessment_FINAL.pdf Summary: The Hook Valley and its tributaries form a physical feature that defines a natural boundary between the rural area and the urban area of Warsash.

8 The natural setting or features in an area Warsash historically grew from its origins near the mouth of the Hamble and slowly over the centuries expanded into the surrounding heathland as its economy prospered and population increased. However today sadly Warsash has lost its distinct and historical separateness, now forming part of one large urban sprawl of residential and non residential dwellings known collectively as "Western Wards". Whereas the four distinct settlements of the hamlet of Hook , the Hook Park Estate, Solent Breezes at Chilling and Abshot continue to enjoy, by being separated in the rural area by the important physical boundary of the Hook Valley, as already expressed previously, have been able to retain a sense of individuality in community difference in relation to each other and to that of the Western Wards. Summary: The natural setting of the proposed area is clearly divided into the two separate settings one being the urban area having the clock tower and the Warsash conservation area as its historical focus. The other being the open rural sector of the remainder of the proposed area having at its heart the conservation area of the hamlet of Hook.

9 Size of the population (living and working) in the area Based on the 2011 Census collated output areas for the proposed area of the Warsash ward (See <http://www.ukcensusdata.com/warsash-e05004530>) , there were approximately 2,857 residential properties in the area at that time. Since then sadly well over 800 new residential dwellings have either been built or have planning permissions. According to the 2011 Census data a total of 7183 residents were recorded. Based on an average household size of 2.40 for the Warsash ward, the additional residential addresses in the area that have been or will subsequently be built in the near future translates into an indicative population of 9,103 people. The number of people living and working within the Warsash urban area , by the time the neighbourhood plan reaches its referendum stage, is likely to approach near to double the 5,500 resident benchmark . Summary: As has been previously noted the proposed area is divided into two separate areas. The highly strategically important rural sector and the urban centre of Warsash itself. The populations are obviously vastly differing for these two areas. However specifically for the number of individuals living and working in the urban area of Warsash, although likely to approach double the benchmark it should be noted that within an urban context, populations covered by neighbourhood plans are often greater than the benchmark. (Continued on Page 7)

(Representation Page 7) Assessment against Factual and Policy Matrix Element 2: The character of the proposed Neighbourhood Area. The separate characters of each of the sectors within the proposed neighbourhood area are identified in a number of existing statutory development plan documents, conservation area designations and local plan 2036 evidence base documents. For instance; Hook Conservation Area Appraisal & Management Strategy (Adopted Jan 2011) <https://www.fareham.gov.uk/pdf/planning/cacawars.pdf> : "2.1 The hamlet of Hook lies in the countryside, approximately 2 miles west of Titchfield and about a mile north of the coast. The small settlement is situated at the junction of Hook Lane, Chilling Lane and Hook Park Road near the head of a former tidal inlet known as 'The Fleet'. It was designated as a Conservation Area in 1974. The hamlet contains 7 listed buildings and 2 locally listed buildings. 2.2 The settlement is surrounded by open countryside which

provides its setting and contributes strongly to its character" (Para 2.2) "The hamlet retains a distinct rural character and all the roads into it retain a rural feel." (Para 4.1) It should be duly noted that the un adopted section of Hook Park Road lying outside of the present boundary to the conservation area contains a further 3 listed buildings. This part of the road network is one of a dwindling number of ancient graveled roads that remain within the Fareham Borough. It is clearly shown on the third Earl of Southampton Henry Wroithesley's map of the parish of Titchfield c1610, and can safely be stated that it was part of the road network into the old medieval settlement of Hook and as such both the road surface and the boundary banks and hedges and trees should be given enhanced protection. For further information concerning the landscape character of the Hook Valley and the Chilling / Brownwich Coastal Plain please refer to the following sections of the Fareham Landscape Assessment (EV40 Aug 2017) Sections 2.3 & 2.4 (assessment of sensitivity and development potential) Sections 4.4 & 4.5 (landscape character area boundaries) https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV40-FarehamLandscapeAssessment_FINAL.pdf Similarly ; Warsash Conservation Area Appraisal & Management Strategy (Adopted Jan 2012) <https://www.fareham.gov.uk/pdf/planning/camwars.pdf> " 2.1 Warsash Conservation Area comprises the small historic riverside settlement close to the mouth of the Hamble River. Included within its boundary is Shore Road, the waterfront and a group of buildings behind bounded on their north eastern side by Passage Lane, together with an area of open land known as the Strawberry Field. 2.2 The Hamble River and valley provide a setting for the Conservation Area. The activities, sounds and smells associated with the river and its boatyards provide a strong sense of place. The river is also an important habitat for wildfowl and has been given national and international protection. These aspects of the river contribute to the setting of the conservation area. There are important views of the river from locations throughout the conservation area." For further information concerning the landscape character of the Lower Hamble Valley (which contains the Warsash foreshore) please refer to the following sections of the Fareham Landscape Assessment (EV40 Aug 2017) Section 2.2 (assessment of sensitivity and development potential) Section 4.3 (landscape character area boundaries) https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV40-FarehamLandscapeAssessment_FINAL.pdf

CONCLUSION Based upon the above assessment against the NPPG, it can be concluded that whilst the Warsash ward that forms the basis of the proposed neighbourhood area does reflect the rationale taken by the applicant, it is clear that due consideration regarding the appropriateness of the proposed area for designation has not been carried out. Clearly the rural area is of a materially significant distinct character difference with respect to the urban area of Warsash. Specifically the rural area is; i) both historically and physically separated from the Warsash urban area. ii) of wide strategic importance, with regards to both international and nationally protected nature sites iii) has heritage assets lying within a landscape setting that is important for the whole of the Borough of Fareham with regards amenity value being able to offer both recreational and tranquillity space for residents of the Western Wards and further afield. iv) is such that within each of its four distinct sub areas namely; the Hook Park Estate, Solent Breezes (Chilling), Abshot & the conservation area of the hamlet of Hook there is extremely limited potential for urban expansion. It should be noted that as it is a legal requirement that any future neighbourhood planning proposal must be in general conformity with the strategic policies contained within the Council's adopted Development Plan, it could be misleading and frustrating to community expectations if areas that are clearly likely to be subject to wider strategic proposals, such as the rural areas of Hook, Chilling and

Abshot, which could not be influenced by the content of any future neighbourhood plan, were to be included within its designated area. The assessment above demonstrates two distinct character types within the proposed neighbourhood area- A) the large tracts of open and protected land within the rural part of the area, together with the four independent and significantly different settlements as previously described. B) the physically separated (by the Hook Valley tributary) predominantly urban residential area of Warsash itself with its distinctly differing and important yachting activities within its foreshore marinas. These are two quiet distinctive areas. Such variation in character within the proposed neighbourhood area applied for does not accord with NPPG paragraph 033 Reference ID: 41-033-20140306 bullet points 4, 5, 7 and 8. (Continued on Page 8)

(Representation Page 8)

RECOMMENDATION In considering the various components of the factual and policy matrix as set out above and the arguments expounded within Section 1 Part A 11) , it can only be reasoned that on balance the entirety of the proposed neighbourhood area as submitted is not appropriate to be designated. Therefore in order to allow the present application for a neighbourhood area to proceed another proposed neighbourhood area should be considered namely:- to divide the area in the present proposal into the two distinct areas based on the factual and policy matrix, to inform the recommendation and the designation of a new amended Warsash Neighbourhood Area. I propose that the following be taken into consideration for a new boundary namely:- Modify the presently proposed map to exclude all that area lying south of the midpoint of the Hook Valley from its mouth to the point at which it reaches the midpoint of the bridge at Fleet End Road. From there to exclude all that area to the east as the boundary continues in a northerly direction along the centre line of Fleet End Road until you reach the bridleway (Fareham 27) at Fleet End Bottom and then to exclude all the area south as the boundary continues along this bridleway until it reaches the Warsash Road. The boundary then follows the Warsash ward boundary as per the present proposal. This divides the designation area into the more logical grouping of rural area and urban area. It has regard to the obvious differences in the physical appearance and characteristics of the two regions. The differences in population between the two topographically separate areas and helps protect both areas distinct historical identities. According to the WNF's constitution presently attached to this current application which states in section 10.1 a) "Membership is open to individuals who live, are regular visitors or work in the Warsash Neighbourhood Area. It is also open to individuals who are elected members of Fareham Borough Council whose area falls within the Warsash Neighbourhood Area." As the residents of the rural area lying outside of the Warsash urban area can clearly and accurately be described as "regular visitors" to the area designated under this new proposal, namely the urban area of Warsash as they would have friends, family, enjoy the facilities within and continue to use the shops and other businesses as they do at present then they would under the present constitution as supplied under this application be eligible to become members and committee members. And importantly at the time of a referendum the examiner would (in my opinion) be highly likely to except an expansion to the referendum area, thereby allowing the residents of the rural area the right to vote even though they were not part of the designated area. The benefits of this new proposal for the Warsash Neighbourhood Forum are that certain complex arguments concerning the nature of the rural area relating to protected sites and legislation requirements to environmental issues of any potential impacting by neighbourhood policies would be removed thus saving both financial contributions to consultants and importantly speed up the process by simplifying the workload that is required to be undertaken. This I believe to be the most suitable arrangement over the coming few years whilst both the LPA and the WNF's plans

emerge. It is unknown what central Government policy will be in the future but I my own personal hope is that the strategic policies which have protected the rural area of Hook, Chilling & Abshot will not only remain into the mid to long term but also will be strengthened and enhanced in order to further protect this ever increasingly important area of the borough of Fareham and that the WNF produces a most marvellous plan that is perfect for their requirements within the boundary of the urban area of Warsash. (End of Representation)