

Planning and Development Scrutiny Panel

24th February

Regulation 19 Local Plan Consultation

Summary of Responses

The Process

- The Council undertook a Regulation 19 consultation on its Publication Local Plan in November/December last year.
- The consultation lasted 6 weeks.
- Special Edition Fareham Today and Virtual Exhibition.
- Received over 300 responses with 1,300 visits to the virtual exhibition.
- Government made its announcement regarding Standard Methodology during the last week of the consultation.

The Process

- Anyone/organisation responding was required to comment on specific questions or tests only (this is different from previous consultations):
 1. **Legal Compliance** – Does the plan meet the legal requirements?
 2. **Soundness** – Has the Plan been positively prepared?
 3. **Duty to Cooperate** – Has the Council engaged and worked with its neighbours effectively?
- They were asked to identify which specific policy or paragraphs their representation concerned.
- All the responses will be forwarded to the Planning Inspector for consideration.

The Process

- Officers in Planning Strategy have been reviewing all the representations.
- They have been sorted into alphabetical and policy order (required for submission to the Inspector).
- Responses have been summarised on a Policy basis (around 800 individual comments).
- The following slides summarise the key points/themes from those representations on each chapter.

1. Introduction

1. Some residents feel that previous consultation responses not taken into account and there was no response at Council to the Petition.
2. Insufficient methods of consultation and Fareham Today not received.
3. Consultation too complicated and restrictive.
4. Community generated evidence carries less weight than consultants' evidence.
5. Should not base housing need on a proposed figure.
6. No reference made to 2017 unadopted Plan.
7. Welborne Plan should be reviewed.
8. Need to consider unmet need in light of PfSH figure of 10,000.
9. Duty to Cooperate Statement should include agreed SoCGs.

2. Vision and Key Strategic Priorities

1. Residents query the range of methods used to consult and variance from SCI.
2. Warsash residents questioning redrawing of the settlement boundary around HA1 - Plan does not deliver on priority of maximising development in urban areas, and that infrastructure is inadequate and allocation should be removed.
3. Residents feel a greater vision is required to help the town centre survive.
4. Plan fails to address commitment to carbon neutrality.
5. Development industry feels Plan could go further in recognising role within sub-region especially in meeting unmet need and addressing climate change in infrastructure provision.

3. Development Strategy

1. Residents feel that the housing distribution is disproportionate across the Borough, particularly weighted towards HA1.
2. Also concern that decision has been made to rewild strategic gap without consultation
3. Developers suggest that plan should prioritise areas that can achieve 'good growth'.
4. GBC reiterate concerns around development in the Strategic Gap.
5. HCC support removal of HA2 and SGAs to which they had holding objection.

4. Housing Need and Supply

1. Some residents feel housing supply does not focus on development in urban areas and concern at level of development in Western Wards.
2. PCC request Fareham take 1,000 dwellings unmet need.
3. Two views on unmet need. Residents and CPRE suggest agreeing to take any PCC unmet need is premature ahead of PfSH SoCG – developers suggest the same but because unmet need figure may be higher.
4. Developers feel housing numbers are flawed and out of date – Council should allocate additional housing sites.
5. Also that despite contingency there is still a heavy reliance on Welborne and past under-delivery has not been dealt with.
6. Developers also feel that there is no evidence to support removal of certain sites.
7. Welborne Plan should also be reviewed as delivery is questionable.

Housing Allocations

1. Resident responses made primarily in relation to sites HA1 Warsash Cluster, HA32 Egmont Nurseries, HA42 Cams Alders and HA45 Rear of 77 Burr ridge Road.
2. Opposition to all four sites - unfair spatial distribution across the borough.
3. Infrastructure provision of concern, and HA32 exclusion from ASLQ considered inappropriate.
4. HA42 considered inappropriate on basis of SINC impact, drainage and impact on setting of Fort Fareham (Natural England and Historic England).
5. Questions over suitability of HA4 given 2 refusals of the application.
6. Policy wording comments about a number of sites.

Housing Allocations

7. A number of alternative sites have been proposed through the consultation responses.
8. Majority of those are already known and have been assessed through the SHELAA and discounted for various reasons.
9. Only two new sites – Land west of Peak Lane and Land South of Swanwick Lane.
10. Some of the discounted sites re-submitted at lower yields to address SHELAA concerns.
11. Newlands (various), West of Downend Road (500-600), Rookery Farm (150-200), East of Newgate Lane (385) and West of Botley Road (350-400) all proposed.

5. Housing Policies

1. Some resident opposition to the Gypsy and Traveller site in Burridge – provision should be spread across the borough – lack of consultation a concern.
2. Developers suggest amendments to urban area boundaries in relation to HP1.
3. Support from developers on HP2 but residents feel it is too open and subjective.
4. Support from developers on HP4 but GBC object as could undermine the Plan's development strategy policies – they suggest that if no 5yhs first area of search is outside urban area.
5. Developers seek flexibility in affordable housing policy – HCC want to see greater range of needs considered for specialist housing.
6. GBC object to HP6 as could undermine the Plan's development strategy policies, CPRE consider there should be an upper limit to prevent large sites.

5. Housing Policies

7. Developers feel policy HP7 is both inflexible and unjustified as not supported by robust evidence and impact on viability not fully considered.
8. HCC state that HP8 should specifically mention specialist provision for affordable and developers feel that this policy should be restricted to highly accessible locations such as town/district centres only.
9. Developers raise concerns and object to requirement in HP9 for sites over 40 units to provide 10% self build – querying the justification for 40. Council should allocate self build sites instead.
10. Support from neighbouring Council's on HP11 but concern that the provision of 3 pitches is minimum requirement – would like to see more.

6. Employment

1. Strong conviction from promoters/developers that strategy of 3 allocated sites lacks flexibility and choice and raises serious concerns over deliverability. Additional sites should be allocated to bolster supply and uses on allocated sites left flexible. Support for Daedalus allocation.
2. Questions from developers over site allocations in terms of market attractiveness and deliverability. Suggest that additional sites should be included.
3. Developers argue policy E5 should allow for flexibility in expansion beyond existing boundaries.
4. Support from GBC towards E7 Solent Airport, but objections from residents on basis that this is not an 'airport' and should not be promoted as such and that 40,000 movements is too excessive in this location.

7. Retail and Community Facilities

1. Some residents feel that local retail/commercial figures do not cater for additional houses in Warsash and plan should include retail floorspace for western wards.
2. Concern from some residents that out of town shopping is not defined in R2. Out of town shopping takes custom from local shopping areas.
3. Concern from HCC and Sport England that policy R4 is overly restrictive in re-provision terms but not restrictive enough in terms of losing facilities.

8. Climate Change

1. HCC question whether the Plan goes far enough in supporting government and HCC objectives and residents environmental organisation feel need inclusion of carbon reduction and sustainability targets, energy efficiency standards etc.
2. Support for policy on flood risk with some minor additions, however developers would like to see more flexibility regarding SuDS.
3. Natural England want to see the policy CC3 help facilitate the relocation of valued environmental assets away from risk areas.
4. Residents want to set targets set for carbon emission reductions through policy CC4.

9. Natural Environment

1. Support for policy NE1 from CPRE and NE but concern from residents that wording is too weak in relation to when development 'cannot be avoided'.
2. Developers feel 10% requirement for Net Gain in NE2 is premature and goes beyond current requirements. Residents and Natural England supportive and seek monitoring scheme. PCC raise the issue of potential 'unmet' net gain from their Plan.
3. NE welcome policy NE3 and developers agree with financial contribution approach but residents voicing concerns that strategy is not successful enough and requires tougher measures.
4. Fisherman object on basis that NE4 does not protect habitats in the Solent and some concern from CPRE about effectiveness of mitigation. Developers believe methodology is too onerous and results in excessive mitigation.

9. Natural Environment

5. Flexibility required in relation to NE5 and the changing nature of designations suggested by NE and developers – policy should refer to online Solent Wader and Brent Goose Strategy.
6. Support for policy NE6 but residents feel a replacement quota should be required for every tree felled and woodland trust feel more protection is required for ancient woodland and veteran trees.
7. HCC and CPRE support policy NE8 but feel it could go further by requiring sustainable transport and being focused around mass public transport hubs. Developers feel the provision of Electric Vehicle Charging Points is too onerous and will impact viability.

9. Natural Environment

8. Support for policy NE9 with suggestions would be better formalised as a green belt. GBC and PCC highlight importance of cross-boundary links and networks including a joint strategy for the strategic gap.
9. Some residents feel policy NE10 fails to protect open space and should include minimum requirements. NGOs identify areas where policy could be improved and linked to wider green infrastructure.

10. Transport and other Infrastructure

1. Residents concerned about the deliverability of TIN1 especially cycling and walking as alternative to car. Not enough done through the plan to promote it. Specific concern in relation to accessibility of Warsash 'peninsula' and traffic impacts.
2. PCC supportive of sustainable transport links between authorities.
3. Plan should recognise A27 transport corridor study in relation to TIN2 currently being undertaken by highway authority. Residents concerned that Warsash hasn't been included in transport assessment – TA therefore invalid.
4. PCC, GBC and HCC all supportive of TIN3 and safeguarding of SEHRT route.
5. Resident concern over infrastructure provision through TIN4 especially regarding Warsash. Concern over IDP assessment and how valid it is.
6. Developers feel TIN4 needs to be clear on CIL/s106 relationship.

11. Design

1. Some residents feel that targets on D1 should be set higher than building regs whereas developers responded say the bar has been pushed too high.
2. General support from other bodies, but request from Police to seek addition to aid crime prevention.
3. Developer concern that policy D3 interferes on private property rights with regards to preventing/depressing returns to landowners.
4. Water and environmental bodies supportive of policy D4, developers against as requirements should be optional if for a nitrate issue. Evidence required to demonstrate need for higher standards.
5. Developers strongly advocating that policy D5 is unsound and unjustified as there isn't the evidence of need.

12. Historic Environment

1. Positive response to policy HE1.
2. Resident response to HE2 made in connection to Warsash housing sites - the allocation of housing at Warsash does not preserve or enhance the Conservation area – policy is unsound.