

28<sup>th</sup> February 2020

FAO: [planningpolicy@fareham.gov.uk](mailto:planningpolicy@fareham.gov.uk)

**Fareham Local Plan 2036 Supplement**  
**Regulation 18 Consultation**

Dear Sirs,

Please find attached comments from CPRE Hampshire regarding the Regulation 18 Fareham Local Plan 2036 Supplement consultation.

Firstly, a general point; CPRE Hampshire is disappointed that there seems to be no mention of a potential South Hampshire **Green Belt** in the Reg 18 consultation. In Fareham BC's previous consultation of July 2019, there were a number of mentions of this option, notably in Section 10c regarding the Meon Valley, where it said "The Council will also be working with PUSH to consider the potential for greenbelt land across local authority areas, and there could be scope for this area to become part of a South Hampshire greenbelt." As CPRE Hampshire has long campaigned for a sub-regional area of restraint in order to encourage urban regeneration and prevent sprawl, this was very much welcomed. Sadly, this does not seem to have been included in the Reg 18 document, and we consider its exclusion to be a significant wasted opportunity, as the NPPF allows local authorities to designate Green Belt as part of the Local Plan process. It was agreed that the PFSH authorities would consider a new Green Belt as part of their forthcoming Statement of Common Ground and we would have hoped to see Fareham BC leading the way. We must therefore **object** to the Supplement on this basis.

## **Development Strategy**

**Para 2.5 Spatial Strategy:** CPRE Hampshire agrees with these principles but notes that a South Hampshire Green Belt could aid considerably in achieving these goals.

**Para 2.8 Areas of Special Landscape Quality:** We agree with the appraisal of valued landscapes and that these could be formalised, as in previous plans, with a policy for 'Areas of Special Landscape Quality', in addition to showing them on Figure 2.1.

**Para 2.9 Strategic Gaps:** We note the decision to re-define strategic gaps (the Meon and Fareham-Stubington gaps) and suggest that a new Green Belt could achieve this. In particular an area could easily be defined to encompass the Meon Valley, which could link to an area of larger Green Belt to the north of the Borough in Winchester District.

**Para 2.10 Climate Change:** CPRE Hampshire believes that one of the most fundamental ways of combating the likelihood of adverse climate change, is to plan development where it can use better public transport and be less reliant on the car. The aspirations in the Supplement are more about how development can respond to climate change, and rather less about how spatial planning of future development can help prevent it. We consider that this is a missed opportunity. Policy NEXX in Para 4.35 does not go far enough, see later comments.

**Para 2.11 Green Infrastructure:** CPRE Hampshire agrees that green infrastructure is important to the wider ecological network and to the health and wellbeing of residents, but suggests that it would be better protected in perpetuity were it to be formalised as part of a new Green Belt.

**Para 2.12 Transport Corridors:** We recognise that Fareham BC aspire to have 'good growth' with existing and proposed transport corridors influencing choice of development, but we feel a simple aspiration does not go far enough. The Council should feel empowered to reject development which is not already located around, or can provide, public mass transit hubs, in particular the rail network.

## **Housing**

**Paras 3.2 to 3.4:** CPRE Hampshire recognises that the current guidance from MHCLG requires the calculation of local housing need (LHN) based on figures from the 2014-based household projections, and that this leads to the figure of 520 dpa for Fareham. However, the 2016-based population projections show a marked decrease in Fareham compared with the 2014-based projections. With the 2018-based population projections showing a similar trend at England countrywide level, we anticipate that the 2018-based household projections will confirm that the trend seen in 2016 is correct, and we might expect that Fareham's LHN might drop. Therefore the 2016-based household projections should be considered a material factor for the Fareham Local Plan. Should the government choose, as they sensibly should, to move towards more up-to-date household figures from the 2016 or 2018-based projections, then the LHN figure for Fareham would drop to 463 dpa or potentially even lower. The 2018-based figures are expected in Spring 2020. CPRE Hampshire will support Fareham BC should they choose to use the more up-to-date figures as some other local authorities have done.

**Para 3.18 and Policy XX Five-Year Housing Land Supply:** CPRE Hampshire has significant concerns about the unintended consequences of this policy, and believe that it may lead to legal wrangles over the 5YHLS and differing interpretations of each of criteria a) to d).

**Para 3.21 and Policy XX Strategic Growth Areas:** We would like to see reference to sustainable transport and mass transit as part of the policy. We hope that Fareham BC will feel empowered to reject any masterplan that does not include this aspect. The principles of development and transport as set out in the Transport for New Homes checklist should be followed - <https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>.

**Para 3.23 North of Downend Criteria f) to j):** See above re principles of public transport. This must be mandatory and in its absence any application should be refused.

**Para 3.23 North of Downend Criteria k) and l):** CPRE Hampshire supports the requirement to respect the rural setting of the area, and importance of natural greenspace, and would like to see an additional sentence or criterion to minimise light pollution.

**Para 3.23 South of Fareham Criteria g) to i):** See above re principles of public transport.

**Para 3.23 South of Fareham:** CPRE Hampshire would like to see an additional sentence or criterion to minimise light pollution.

**Paras 3.28, 3.29 and Policy XX New Small-Scale Development outside defined urban areas:** CPRE Hampshire recognises the aim of this policy, but has significant concerns about the unintended consequences of this policy, and believe that it may lead to legal wrangles over differing interpretations of each of criteria 1 to 4. We would suggest it might be preferable to define settlement policy boundaries for the smaller settlements to avoid potential confusion as to what might be considered 'sustainably' and 'reasonably' located.

## **Natural Environment**

**Paras 4.1 to 4.8 Landscapes:** CPRE Hampshire agree with Fareham BC's analysis of the Borough's varied landscapes and supports any intention to define them as Areas of Special Landscape Quality, illustrated in Figure 4.2. However, CPRE Hampshire suggests that some of these could be further protected if they formed part of a wider South Hampshire Green Belt, in particular the Upper Hamble Valley, the Meon Valley, the Forest of Bere and Portsdown Hill.

**Para 4.16 and Policy NEXX Landscape:** CPRE Hampshire is concerned that the wording of this policy does not infer sufficient protection for these areas, particularly as they are to be considered as valued landscapes in accordance with the NPPF. We do not support the first sentence of this policy and strongly **object** as we believe that it may lead to legal wrangles over differing interpretations of what 'taking account' might mean in respect of the quality, local distinctiveness and sensitivity to change of landscape character areas. We suggest deleting this sentence entirely and starting with the sentence which is currently the second sentence.

We also suggest the addition of the word 'only' into that second sentence as follows; *'Development in the countryside will **only** be permitted where it contributes to and enhances the landscape with particular regard to....'*

**Paras 4.18 to 4.24 and Policy NEXX Trees, Woodlands and Hedgerows:** CPRE Hampshire agrees with any policy that supports the preservation or enhancement of trees, woodlands and hedgerows. We believe that Para 4.24 should be moved to be within the policy rather than in the supporting text.

**Para 4.35 to 4.36 and Policy NEXX Climate Change:** CPRE Hampshire agrees with Criteria b) to e) which are worthwhile and important. However, we feel that Criterion a) does not go far enough. According to Camilla Ween, Harvard Loeb Fellow, speaking on behalf of Transport for New Homes "Transport is responsible for about 26% of greenhouse gas emissions, much arising from personal car journeys. Our society will not be able to achieve the UN goals if we do not change the way we travel; that means we need to create new communities that are NOT car dependent. That means careful consideration of where new development is located, as well as how we design new communities, for example, places that are well connected with high quality public realm and movement infrastructure that encourage people to want to move to a car-free lifestyle." It must be a fundamental tenet of the Fareham Local Plan that NO development should be permitted that relies on the car as its main means of access. The principles of development and transport as set out in the Transport for New Homes checklist should be followed -

<https://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>.

Nothing less than a drastic change to spatial strategy and a move away from South Hampshire's historic pattern of sprawling suburbs will enable any meaningful contribution to the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that have become entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture. That said, the policy should contain a requirement for all development to provide for electric charging points.

Yours faithfully,

Caroline Dibden

CPRE Hampshire

