

15<sup>th</sup> December 2020

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

**Fareham Local Plan 2037 Publication**  
**Regulation 19 Consultation**

Dear Sirs,

Please find attached comments from CPRE Hampshire regarding the Regulation 19 Fareham Local Plan 2037 consultation.

Firstly, a general point; CPRE Hampshire is extremely pleased to see that Fareham BC have approached their new Local Plan from a landscape-based perspective, a process which we wholly support. Furthermore, we fully endorse Fareham BC's inclusion of a Climate Change policy, which must underpin all other policies and spatial planning.

Furthermore, we are pleased to see that Fareham have adopted housing numbers based on the latest available housing projections from the ONS, the 2018-based projections, which show a considerable reduction in estimated local need.

However, we remain disappointed that there seems to be no mention of a potential new South Hampshire **Green Belt** in the Reg 19 consultation. In an earlier consultation by Fareham BC in 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 19 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 has been agreed that the PFSH authorities are to 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.

CPRE Hampshire has completed Response forms for individual policies which are attached below this letter, but in summary our headline comments are as follows:

### **Development Strategy**

**Strategic Policy DS1 Development in the Countryside:** CPRE Hampshire agrees with these principles but notes that a South Hampshire Green Belt could aid considerably in achieving these goals.

**Strategic Policy DS2 Strategic Gaps:** We note the decision to re-define strategic gaps (the Meon and Fareham-Stubbington gaps) and suggest that a new Green Belt could achieve this. 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.

**Strategic Policy DS3 Areas of Special Landscape Quality:** 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 3.3. However, CPRE Hampshire suggests that some of these could be further protected if they also 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.

## **Climate Change**

**Strategic Policy CC1 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 Policy CC1 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. 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.

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. The adoption of a South Hampshire Green Belt would assist this by encouraging urban redevelopment, and preventing sprawl into the countryside where modal change to walking, cycling and public transport is very much more difficult to achieve.

## **Housing**

**Policy H1 Housing:** 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, although a recent MHCLG consultation suggested a new methodology. Whatever the methodology, CPRE Hampshire supports Fareham BC in using the most up-to-date household figures based on the 2018-based projections. We also welcome the removal of Policy HA2 from the Reg 19 Local Plan.

**Policy HA1 Warsash:** CPRE Hampshire does not believe that the proposed development around Warsash can be considered truly sustainable, reliant as it is on the car as the main means of transport. We are concerned about the lack of a masterplan and believe the proposed framework does not fulfil a place making function.

**Policy HP4 Five-Year Housing Land Supply:** CPRE Hampshire has significant concerns about the unintended consequences of this policy, specifically its linkage with DS1, and believe that it may lead to site selection looking outside the Urban Area in the first instance.

**Policy HP6 Exception Sites:** The potentially inadvertent use of the word OR in Criterion c) could allow significantly large exception sites to be allowed, as long as they remain below the threshold of 5% of the size of the adjacent settlement. There should be a fixed upper limit.

## **Natural Environment**

**Strategic Policy NE1 Protection of Nature Conservation, Biodiversity and the Local Ecological Network:** CPRE Hampshire supports the use of ecological network mapping to conserve nature and protect biodiversity and as a tool for influencing spatial planning.

**Policy NE2 Biodiversity Net Gain:** CPRE Hampshire supports the requirements for 10% biodiversity net gain on all development.

**Policy NE4 Water Quality effects on the SPAs, SACs and Ramsar sites of the Solent:** CPRE Hampshire understands there is an outstanding judicial process underway regarding the effectiveness of Fareham BC’s proposals for mitigating nitrate and other pollutants on the Solent and other protected waterways. At this point, CPRE Hampshire is therefore unable to endorse the proposed policy until the legal issues have been resolved.

**Policy NE6 Trees, Woodlands and Hedgerows:** CPRE Hampshire agrees with any policy that supports the preservation or enhancement of trees, woodlands and hedgerows.

**Policy NE8 Air Quality:** CPRE Hampshire supports the requirements for air quality improvement but considers more could be achieved if development were only to be permitted in locations around mass public transport hubs, rather than being car dependent.

**Policy NE9 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.

## **Transport and Other Infrastructure**

**Strategic Policy TIN1 Sustainable Transport:** CPRE Hampshire recognises that Fareham BC aspire to have ‘good growth’ with existing and proposed transport corridors influencing choice of development, but we feel the policy 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.

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/>.

## **Design**

**Strategic Policy D1 High Quality Design and Placemaking:** The design quality of future developments starts with overall masterplanning and landscape context as well as specific building details. Fareham has seen a proliferation of poorly designed car dependant nondescript developments over recent years, and it is critical that major improvements are made for the future.

Yours faithfully,

Caroline Dibden

Vice-President  
CPRE Hampshire



A1 Is an Agent appointed:

**No, an agent is not appointed**

A2 Please provide your details below:

Title:

**Mrs**

First Name:

**Caroline**

Last Name:

**Dibden**

Job Title:

**Vice-President**

Organisation:

**CPRE Hampshire, the countryside charity**

Address:

**Winnall Community Centre,  
Garbett Road,  
Winchester,  
Hampshire,  
SO23 0NY**

Telephone:

**01962 841897**

Email Address:

**carolined@cprehampshire.org.uk**

## **POLICY DS1: Development in the Countryside**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
<b>X</b>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 3.29 – 3.36**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Strategic Policy DS1: Development in the Countryside**

B1c Which part of the Policies Map?

**Areas of Special Landscape Quality and Strategic Gaps**

- a) East of Welborne,**
- b) the Strategic Gap along the Meon, and**
- c) to the north-west of the borough.**

2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire STRONGLY SUPPORTS the overall approach taken by Fareham BC in the Fareham Local Plan 2037 for a spatial strategy based on countryside, which is justified as it is in accordance with the aspirations as set out in the NPPF for development to be brownfield first, and for countryside to be protected for its intrinsic value and beauty, and for protection of Best and Most Versatile agricultural land. It is also supported by the Government's 25-year Environment Plan and for the recommendations as set out by the Climate Change Committee.

Furthermore, CPRE Hampshire SUPPORTS the Vision for the Fareham Local Plan 2037 which states that Fareham BC seek to retain its identity, and the identity of individual settlements within the Borough, through measures that seek to retain the valued landscapes and settlement definition.

We also SUPPORT Strategic Priority 2 which seeks to maximise development in the urban area and away from the wider countryside, valued landscapes and those of special quality and spaces that contribute to settlement definition.

CPRE Hampshire believes that the Vision and Strategic Priority 2 would both be better achieved if a new Green Belt was designated, due to its permanence and effectiveness. We submitted to Fareham BC and to PFSH a report by NEF Consulting on the potential socio-economic and environmental benefits of a Green Belt: <https://www.cprehampshire.org.uk/our-campaigns/south-hampshire-green-belt/>. This demonstrates the considerable financial benefits as well as to health and wellbeing, climate change and natural capital of protecting the green space near to population centres, in perpetuity, something that only Green Belt is designed to achieve.

Looking at the specific policy wording, CPRE Hampshire believes that criterion (e) of **Policy DS1** is unsound, specifically in the way it permits development in the countryside that is compliant with Policies **HP4, HP5 and HP6**. Permissions that might be compliant with these policies appear to be in direct contradiction with the other criteria in **Policy DS1**, and the policy is therefore internally inconsistent.

**HP4** relates to the Five Year Housing Supply (5YHLS) and allows residential development outside the urban area boundary where the Council is unable to demonstrate a 5YHLS. It is believed that the Government intends to remove 5YHLS test in the planning reforms, so this policy may be redundant and should be reworded to future proof its deletion. However, that notwithstanding, the main problem is that the wording of Policy HP4 and its linkage with **DS1** could unintentionally lead to countryside locations taking priority over alternative, more sustainable, urban or brownfield locations.

**HP5** relates to the provision of affordable housing on sites of 10 or more, and its linkage to **DS1** could unintentionally suggest that Fareham BC accepts in principle the development of ANY affordable housing site outside the urban area boundary. The risk is that the linkage could potentially enable large scale housing development in the countryside as long as it could be demonstrated that 40% affordable housing would be achieved.

**HP6** relates to small rural affordable housing exception sites, and whilst CPRE Hampshire supports the provision of rural affordable housing, the concern is that the linkage with **DS1** could inadvertently lead to a series of separate applications which in combination amount to significant levels of development in the countryside. The cumulative impact on the separation of settlements resulting from a number of sites each individually sub- 1 hectare or <5% of the adjacent settlement must be considered, but at the moment the policy has no mechanism for dealing with this potential eventuality. See separate comments on **Policy HP6** as regards the use of the word *OR*.

CPRE Hampshire SUPPORTS criteria i) to v) of **Policy DS1** and believe they provide a sound underpinning of the principles aspired to by Fareham BC.

#### B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Fareham BC should look at the areal extent of a possible South Hampshire Green Belt as part of this Local Plan, as it has been confirmed by Leader Cllr Woodward that they wish to see such a designation to protect the countryside and gaps.

Remove the linkage of **Policies HP4, HP5 and HP6** with **Policy DS1**.

#### B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Including a proposed South Hampshire Green Belt would be in accordance with the aspirations as set out by the Council in council meetings, PFSH meetings and in press releases.

Removing the linkage of **Policies HP4, HP5 and HP6** with **Policy DS1** would remove the internal inconsistency by removing the possibility of inadvertent development in the countryside.

B4c Your suggested revised wording of any policy or text:

Remove the linkage of **Policies HP4, HP5 and HP6** from Policy **S1 (e)**.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for Local Plans to take the countryside into account when devising spatial development strategy, and we would like to appear at the Hearings to support Fareham BC in choosing this approach. Our expertise lies in spatial strategy and reconciling development requirements with the environmental constraints of countryside, and its uses and purposes.

## POLICY DS2: Development in Strategic Gaps

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 3.43 to 3.46, Para 3.10**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Strategic Policy DS2: Development in Strategic Gaps**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC to designate strategic gaps between Fareham / Stubbington and the Western Wards (Meon Gap) and between Fareham / Bridgemary and Stubbington / Lee-on-the-Solent (Fareham- Stubbington Strategic Gap). However, a study carried out on behalf of CPRE Hampshire in January 2019, by consultants West Waddy, showed that historically strategic gaps in South Hampshire have failed to adequately prevent coalescence of settlements. This report was shared with Fareham BC as a member of the Partnership for South Hampshire, and can be submitted as part of our evidence on this matter to the examination hearings.

“An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements” – January 2019, West Waddy.

The conclusions show that through appeals and permissions the gaps designated in South Hampshire (including Fareham) have been significantly reduced over time, and are thus an ineffective policy and thus unsound. Para 3.10 confirms that this has been the case in Fareham.



The findings of this report show that “In the national context, South Hampshire is fairly unique among the large urban areas in England in having no designated Green Belt, with reliance instead being placed upon Gaps designated in Local Plans to prevent the coalescence of settlements.”

Furthermore “given the major urban extensions currently being proposed and the past history of erosion of Gaps through subsequent permissions being granted, a strong argument can be made that the current Gap policies across the sub-region are failing in their remit to prevent coalescence and sprawl, which is ultimately likely to lead to currently separate settlements forming one large South Hampshire conurbation and expanding out into the adjoining areas of countryside. The exceptional circumstances therefore exist to demonstrate that a new stronger policy backed by explicit Government advice is needed to prevent this happening and the tool for this is a Green Belt, which is already in use around most large urban areas in England. South Hampshire is the exception in having no such designation.”

CPRE Hampshire has submitted to Fareham BC and to PFSH a report by NEF Consulting on the potential socio-economic and environmental benefits of a Green Belt: <https://www.cprehampshire.org.uk/our-campaigns/south-hampshire-green-belt/>

Notwithstanding the above comments regarding a new Green Belt, CPRE Hampshire SUPPORTS the removal of the earlier proposed Strategic Growth Area SGA, previously entitled HA2 (in the Reg 18 consultation version) from the now proposed Fareham-Stubbington Strategic Gap. The previous inclusion of the SGA was clearly subject to objections by neighbouring Gosport BC, which would have undermined any Duty to Co-operate and thus soundness. It was also objected to by many CPRE members and is therefore of concern to us.

**B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?**

Fareham BC should look at the areal extent of a possible South Hampshire Green Belt as part of this Local Plan, as it has been confirmed by Leader Cllr Woodward that they wish to see such a designation to protect the gaps between settlements.

**B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?**

Including a proposed South Hampshire Green Belt would be in accordance with the aspirations as set out by the Council in council meetings, PFSH meetings and in press releases, and would lead to a much more rigorous policy to prevent coalescence which is Fareham BC’s stated aim.

A need for a South Hampshire Green Belt was confirmed by Cllr Woodward in the Fareham BC Executive Committee at 6pm on Monday 7<sup>th</sup> December 2020. Its omission from the Reg 19 Local Plan consultation is thus not in accordance from the council’s own publicly announced policy.

**B4c Your suggested revised wording of any policy or text:**

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for a new South Hampshire Green Belt, and we would like to appear at the Hearings to further explain our justification and why Fareham merits the exceptional circumstances required to designate a new Green Belt. We have a petition which has been signed by nearly 15,000 people asking Fareham BC (alongside Eastleigh BC, Winchester CC and Test Valley BC) to designate a Green Belt as part of its Local Plan process.

## POLICY DS3: Landscape

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
<b>X</b>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 3.48 to 3.58**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Strategic Policy DS3: Landscape**

B1c Which part of the Policies Map?

**All Areas of Special Landscape Quality**

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

CPRE fully SUPPORTS the approach taken by Fareham BC in respect of analysing and including Areas of Special Landscape Quality as part of its development strategy and as Strategic Policy S3. This is in accordance with the aspirations outlined in the NPPF to value landscape for its intrinsic character and beauty of the countryside, as outlined in NPPF Para 170 a) and b).

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has long campaigned for Local Plans to take landscape into account when devising spatial development strategy, and we would like to appear at the Hearings to support Fareham BC in choosing this approach. Our expertise lies in spatial strategy and reconciling development requirements with the environmental constraints of, and impacts upon, the wider landscape.

## POLICY H1: Housing Provision

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 4.1 to 4.20**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Strategic Policy H1: Housing Provision**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

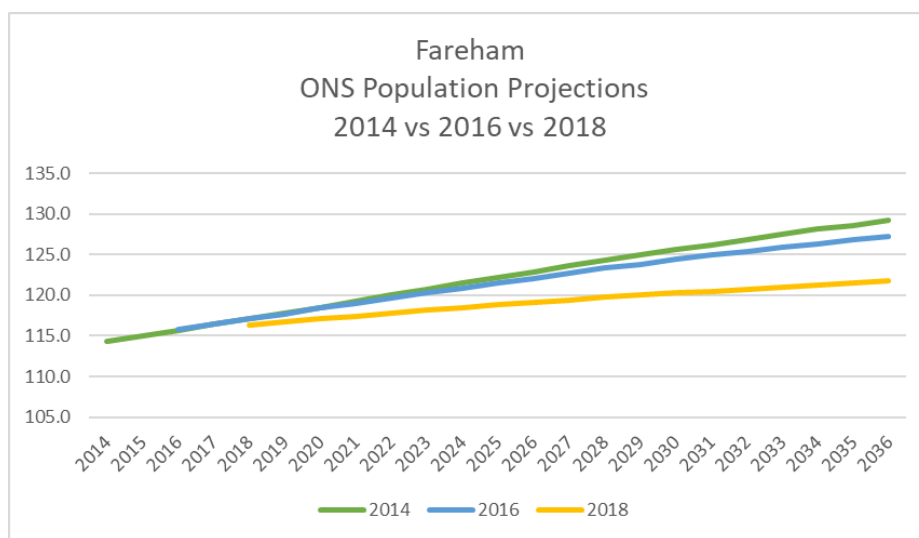
B3 Please provide details you have to support your answers above

The approach taken by Fareham BC to calculating housing need for this Reg 19 version is based upon the MHCLG consultation on a new standard method in August 2020, which showed Fareham's housing need to be lower (403 dpa) than using the previous standard method (514 dpa). CPRE Hampshire SUPPORTS the use of the latest base data on household projections (the 2018-based projections from the ONS) as it conforms with Para 31 of the NPPF "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

As can be seen from the graph below, the most up-to-date population projections (in 000's) for Fareham evidences the trend towards a lower requirement, and this would translate into a lower household projection. The impact of Covid-19, and corresponding economic fallout, on migration patterns will remain unclear for some time, and it is therefore sensible to use a cautious approach to planning and development.

However, for Fareham to agree to take unmet need from Portsmouth is premature, predating as it does the revised statement of common ground from PFSH, and therefore Policy H1 is unsound.

It is also clear that there remains a significant reliance on delivery of housing at Welborne, which is subject to a separate plan. Delays to infrastructure finding at Welborne could have an impact on Fareham's overall strategy for delivery of its housing needs in the plan period.



B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Remove the requirement to take housing from Portsmouth CC.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a recognised authoritative voice on Hampshire's housing numbers, the standard methodology and has been involved in this aspect of Fareham's Local Plans since the time of the South East Plan in 2005, and the formation of PfSH (Partnership for South Hampshire).

CPRE Hampshire is part of an expert group in the National CPRE network on housing numbers, and would like to appear at the hearing sessions to SUPPORT the use of the most up-to-date household projections.

## POLICY HA1: North and South of Greenaway Lane, Warsash

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input checked="" type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Housing Allocation Policy: HA1 North and South of Greenaway Lane, Warsash**

B1c Which part of the Policies Map?

**Figure 4.1**

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire has significant concerns about the piecemeal development already seen, and proposed, in the Warsash area. Population growth in the 10 years 2009-2019 has reached 9% in Warsash and the western wards, while Fareham itself has only grown by 4%. As Warsash has no access to the rail network, this pattern of development could not be considered sustainable. It therefore fails the soundness tests.

An indicative framework as shown in Figure 4.1, but this does not meet the requirements for a masterplan, and it is not adequate for long-term planning to integrate the various separate sites and applications by a series of different developers. Policy HA1 will fail to meet any government aspirations for placemaking as set out in the NPPF Chapter 12, Paras 124 to 130, and is therefore unsound.

Para 124 of the NPPF states “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

Para 125 of the NPPF states “Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics.” It is apparent from discussion with CPRE Hampshire members that there has not, to date, been any meaningful involvement of local communities.

It is clear that the settlement policy boundaries have been moved to accommodate the applications pending for Warsash. This is not consistent with a plan-led approach but is simply reactive to a developer-led situation, and takes no account of the area’s defining features.

**B4a** What modification(s) is necessary to make the Local Plan legally compliant or sound?

More analysis of the sustainability criteria for the overall development strategy, such as access to public transport is required before sites such as HA1 are confirmed. Has every opportunity for brownfield development around rail networks been ruled out?

Much more consultation with the local community is required before the proposed HA1 framework meets NPPF prerequisites.

**B4b** How would the modification(s) you propose make the Local Plan legally compliant or sound?

**B4c** Your suggested revised wording of any policy or text:

**B5** If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

**B5a** Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire, the countryside charity, has worked for some years with local campaign group Save Warsash and the Western Wards, and a number of our members will be affected by the proposals for such a large allocation of housing to one small settlement. We would like to take part in the hearing sessions to represent their concerns for initial choice of an unsustainable site, loss of countryside and open space in Warsash, and poor design due to lack of a masterplan.



## **POLICY HP4: Five-year housing land supply**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 5.22 to 5.28**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy HP4: Five-year housing land supply**

B1c Which part of the Policies Map?

--

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

**Policy HP4** states “If the Council cannot demonstrate a five-year supply of land for housing against the housing requirement set out in Policy H1, additional housing sites, outside the Urban Area boundary, may be permitted where they meet all of the following criteria.....” The problem with this policy is that inadvertently it encourages the first choice of sites to be “outside the Urban Area”. CPRE Hampshire is sure that this is not what Fareham BC intends, and in any event it would not be in accordance with the councils own aspirations for a brownfield first approach, nor in accordance with the NPPF Para 137, and is therefore unsound. A sequential approach should be used, even in the event of a lack of a five-year housing land supply.

The problem is exacerbated by the linkage of **Policy HP4** with **Policy DS1**, particularly **DS1 Criterion (e)** as discussed above.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

**Policy HP4** should be rewritten to include a sequential approach, which “makes as much use as possible of suitable brownfield sites and underutilised land” as per Para 137 (a) of the NPPF.

The linkage of **Policy DS1 (e)** and **Policy HP4** should be removed.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would be in accordance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is part of an expert group in the National CPRE network on housing numbers, and the five-year housing land supply, and would like to appear at the hearing sessions to discuss its impact on the Fareham Reg 19 Local Plan.

## POLICY HP6: Exception Sites

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 5.43 to 5.51**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy HP6: Exception sites**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

The second part of **Policy HP6, Criterion (c)**, would allow exception sites with a limit of 1 hectare *OR* a proviso that the scheme does not exceed 5% of the size of the adjacent settlement. The problem is the word *OR*, as this could lead to large sites adjacent to large settlements being permitted as they would still be beneath the 5% cut-off. For example, Fareham town is a large settlement, of some 20,000 households, and so an exception site of up to 5% could itself number 1,000 dwellings. CPRE Hampshire is sure that this is not what was intended by Fareham BC as the aspiration is for small sites on urban boundaries.

The problem is exacerbated by the linkage of **Policy HP6, Criterion (c)**, with **Policy DS1**, particularly **DS1 Criterion (e)** as discussed above.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

**Policy HP6** should be rewritten to include a sequential approach, which “makes as much use as possible of suitable brownfield sites and underutilised land” as per Para 137 (a) of the NPPF.

**Criterion c)** should be reworded to remove the reference to *OR* 5% of the size of the adjacent settlement and have a fixed upper limit of what is meant by ‘small sites’ as identified in the justification text (Para 5.46).

The linkage of **Policy DS1 (e)** and **Policy HP6** should be removed.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

Any ambiguity on what a “small site” means would be removed giving clarity for applicants and for FBC.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of affordable housing, such that it is located and designed appropriately, and would like to appear at the hearing sessions to discuss the impact of Policy HP6 on the Fareham Reg 19 Local Plan.

## STRATEGIC POLICY CC1: Climate Change

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 8.1 to 8.10**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Strategic Policy CC1: Climate change**

B1c Which part of the Policies Map?

--

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**NO**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire generally SUPPORTS the approach taken by Fareham BC to Climate Change. But we believe that **Policy CC1, Criterion (a)** does not go far enough to encourage/enforce a truly sustainable pattern of development and is unlikely to lead to a meaningful reduction of emissions from private car use.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires that a local authority's development plan documents must: (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

The NPPF Para 148 further includes the requirement that “the planning system should support the transition to a low carbon future in a changing climate”, should “shape places in ways that contribute to radical reductions in greenhouse gas emissions” and Footnote 48 “in line with the objectives and provisions of the Climate Change Act 2008.”

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 **Policy CC1** 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. 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.

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.

**Policy CC1** is therefore not legally compliant unless the large part of Fareham’s spatial strategy is geared to development around mass public transport hubs and avoiding sites which are car-dependant. It is clear that sites such as Policy HA1 would fail to meet this condition.

CPRE Hampshire recommends the checklist provided by Transport for New Homes, which sets out an objective approach to planning new housing areas without dependence on cars:

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2019/10/checklist.pdf>

**B4a** What modification(s) is necessary to make the Local Plan legally compliant or sound?

CPRE Hampshire recommends strengthening **Policy CC1, Criterion (a)** to enable a spatial strategy more likely to meet the requirements set out in Section 19(1A) of the Planning and Compulsory Purchase Act 2004, and the NPPF, by including a requirement for mass public transport hubs to be the first approach for development, and to enable Fareham to refuse car-dependent applications.

**B4b** How would the modification(s) you propose make the Local Plan legally compliant or sound?

It would be in accordance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004, and the NPPF Para 148.

B4c Your suggested revised wording of any policy or text:

- (a) A development strategy that minimises the need to travel by allocating sites and generally directing development to locations **near to mass public transport hubs**, with better services and facilities, or where they are capable of being improved.

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning housing, such that it is located and designed appropriately around public transport hubs to minimise emissions and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy CC1** in this regard.

**POLICY NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network**

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input checked="" type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.5 to 9.27**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**POLICY NE1: Protection of Nature Conservation, Biodiversity and the Local Ecological Network**

B1c Which part of the Policies Map?

**The Local Ecological Network map in Appendix C**

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

The approach taken by Fareham BC is sound, and CPRE Hampshire SUPPORTS the requirement for nature to be conserved and ecological networks to be protected as per the forthcoming Environment Act.



B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning development, such that it is located and designed appropriately to conserve and enhance the biodiversity of the area and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE1** in this regard.

**POLICY NE2: Biodiversity net gain**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
<b>X</b>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.28 to 9.44**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy NE2: Biodiversity net gain**

B1c Which part of the Policies Map?

**The Local Ecological Network map in Appendix C**

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

The approach taken by Fareham BC is sound, and CPRE Hampshire SUPPORTS the requirement for biodiversity net gain as per the forthcoming Environment Act.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning development, such that it is located and designed appropriately to see a net gain in biodiversity of the area, and would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE2** in this regard.

## **POLICY NE4: Water quality effects on the SPAs, SACs and Ramsar sites of the Solent**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.50 to 9.54**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**POLICY NE4: Water quality effects on the SPAs, SACs and Ramsar sites of the Solent**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**NO**

Sound

**YES**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire understands there is an outstanding judicial process underway regarding the effectiveness of Fareham BC's proposals for mitigating nitrate and other pollutants on the Solent and other protected waterways. At this point, CPRE Hampshire is therefore unable to endorse the proposed policy until the legal issues have been resolved.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☒ **YES** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire's remit covers protection and enhancement of both land and seascape, including Hampshire's iconic chalk streams and rivers, and the Solent. In the absence of an outcome on the legal matters, the hearing session may be the first opportunity to evaluate the effectiveness and legality of the proposed policy.

**POLICY NE6: Trees, woodland and hedgerows**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.79 to 9.89**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**POLICY NE6: Trees, woodland and hedgerows**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE6** is sound. The Climate Change Committee has called for a 40% increase in the extent of hedgerows by 2050 to help tackle the climate emergency, and we would thus like to see more hedgerows planted and restored in Fareham BC.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ **NO** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

**POLICY NE8: Air quality**

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.98 to 9.118**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy NE8: Air quality**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE8** is sound.



B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

☐ **NO** Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

**POLICY NE9: Green infrastructure**

B1 Which part of the Local Plan is this representation about?

<input checked="" type="checkbox"/>	A paragraph	Go to B1a
<input checked="" type="checkbox"/>	A policy	Go to B1b
<input type="checkbox"/>	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 9.119 to9.125**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy NE9: Green infrastructure**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound	<b>YES</b>	
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy HE9** is sound. However, we believe that a link with **Policy HE1** should be included within **Policy HE9** itself, rather than just within the supporting text in **Para 9.122**. CPRE Hampshire further believes that much better Green Infrastructure provision could be safeguarded over the long term if it were to be incorporated within a South Hampshire Green Belt.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

YES

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of green infrastructure alongside planning development, such that it is located and designed appropriately, in order to benefit biodiversity, natural capital, but also residents' health and wellbeing. We would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy NE9** in this regard, and to discuss whether a South Hampshire Green Belt could ensure green infrastructure is protected in perpetuity.

**POLICY TIN1: Sustainable transport**

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 10.1 to 10.11**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**Policy TIN1: Sustainable transport**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant	<b>YES</b>	
Sound		<b>NO</b>
Complies with the duty to co-operate	<b>YES</b>	

B3 Please provide details you have to support your answers above

CPRE Hampshire SUPPORTS the approach taken by Fareham BC and consider **Policy TIN1** to be a good starting point. CPRE Hampshire recognises that Fareham BC aspire to have ‘good growth’ with existing and proposed transport corridors influencing choice of development, however we feel **Policy TIN1** 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. The policy as it stands does not give Fareham BC a sufficiently robust mechanism for achieving this. It is therefore unlikely to comply with the aspirations to meet climate change objectives as set out in **Policy CC1** or for air quality in **Policy NE8**.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

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/>.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

The policy would then comply with climate change and air quality objectives.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire is a keen proponent of a spatial strategy for planning housing, such that it is located and designed appropriately around public transport hubs to minimise emissions and impacts on climate change. We would like to appear at the hearing sessions to discuss the likely effectiveness of **Policy TIN1** in this regard.

## POLICY D1: High quality design and place making

B1 Which part of the Local Plan is this representation about?

<b>X</b>	A paragraph	Go to B1a
<b>X</b>	A policy	Go to B1b
	The policies map	Go to B1c

B1a Which paragraph? Please enter the correct paragraph found in the Local Plan e.g. 1.5 would be the fifth paragraph in Chapter 1 (Introduction).

**Paragraphs 11.1 to 11.36**

B1b Which Policy? Please enter the correct Policy Codes found in the Local Plan e.g. HA9 – Heath Road, is the Housing Allocation policy for Heath Road, Locks Heath

**POLICY D1: High quality design and place making**

B1c Which part of the Policies Map?

B2 Do you think the Publication Local Plan is:

Yes

No

Legally compliant

**YES**

Sound

**NO**

Complies with the duty to co-operate

**YES**

B3 Please provide details you have to support your answers above

CPRE Hampshire welcomes the approach taken by Fareham BC towards high quality design in **Policy D1** but would like to see the inclusion of the words countryside and landscape into **Criterion (i)**. The omission of these words makes it inconsistent with **Strategic Policies DS1 and DS3** and therefore unsound.

The design quality of future developments starts with overall masterplanning and landscape context as well as specific building details. Fareham has seen a proliferation of poorly designed car dependant nondescript developments over recent years, and it is critical that major improvements are made for the future.

B4a What modification(s) is necessary to make the Local Plan legally compliant or sound?

Include the words countryside and landscape into **Criterion (i)**.

B4b How would the modification(s) you propose make the Local Plan legally compliant or sound?

This would then be in accordance with **Strategic Policies DS1 and DS3**.

B4c Your suggested revised wording of any policy or text:

B5 If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

**YES**

Yes, I want to take part in a hearing session

B5a Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire has many members in Fareham who are keenly interested in the design of future developments and would like to see major improvements over previous failures in design quality, which has historically resulted in large sprawling estates of car-dependant nondescript housing.