

30th July 2021

FAO: planningpolicy@fareham.gov.uk

Fareham Local Plan 2037 Publication
Revised Version Consultation

Dear Sirs,

Please find attached comments from CPRE Hampshire regarding the Revised Version of the submission Fareham Local Plan 2037. We have only commented on those changes highlighted in red in the Revised Version and assume that our comments remain extant as per our submission on 15th December 2020. Our submission is attached as Appendix A.

It is important to state that it seems extremely strange to be filling in these arduous forms yet again. For those of us who are volunteers this is an onerous and time-consuming process, all done in our own free time.

We recognise that Fareham BC have been forced by the NPPF Standard Method to use the 2014-based household projections from MHCLG for its housing numbers. CPRE Hampshire fundamentally rejects the use of out-of-date projections and has informed the Government at all levels that it is surely in accordance with the NPPF to use up-to-date figures where they are available. We believe that the 2018-based projections are based on a more rigorous analysis by ONS and are superior to those calculated previously by MHCLG. We expect that the 2021 Census will confirm that the 2018-based projections have more validity and combined with the likely changes in demographics following Brexit and Covid, that Fareham BC should seek an early release of the Census figures as it has such a significant impact on its Local Plan. The lowered level of household growth in the 2018-based projections is seen across most of the South Hampshire authorities, not just Fareham, and this will have a substantial impact upon the duty to cooperate vis the PfSH Spatial Strategy.

Furthermore, there has been challenge to the ONS population projections in 50 university cities and towns, and this impacts Portsmouth and Southampton, both of which feed into the PfSH joint work. The Office for Statistics Regulation has asked ONS to make some more checks on this aspect of their projections. This is particularly relevant as the Fareham Local Plan seeks to take some housing for Portsmouth, which may not be required. Documents are attached as Appendices which relate to this matter.

We reiterate that 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, but believe it could be more front and centre, as has been recommended by the most recent NPPF July 2021.

And we remain disappointed that there still seems to be no mention of a potential new South Hampshire **Green Belt** in this Revised Submission Version. 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 either the December 2020 Reg 19 document or this Revised Version, 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 have been changed since December 2020 and these are attached below this letter. We reiterate that our comments from December 2020 are still considered relevant for policies which are unchanged and assume they will also be passed to the Inspector. Our December 2020 submission is attached as Appendix A.

Yours faithfully,

Caroline Dibden
Vice-President
CPRE Hampshire

02392 632696

07887 705431

carolined@cprehampshire.org.uk



The countryside charity
Hampshire

Attachments:

Appendix A – CPRE Hampshire Submission to Fareham Local Plan 2037, previous Reg 19 version, dated 15th December 2020

Appendix B – Letter from Office of Statistics Regulator to ONS, dated 10th May 2021

Appendix C - OSR Review of Population Estimates and Projections Produced by the ONS, dated May 2021

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 ONY**

Telephone:

02392 632696

Email Address:

carolined@cprehampshire.org.uk

POLICY H1: Housing Provision

B1 Which part of the Revised Publication 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 |
| <input type="checkbox"/> | A new housing allocation site | Go to B1d |
| <input type="checkbox"/> | The evidence base | Go to B1e |

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

Paragraphs 4.1 to 4.20

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

Strategic Policy H1: Housing Provision

B1c Which part of the Policies Map?

B1d Which new housing allocation site? E.g. HA55- Land south of Longfield Avenue

B1e Which new or revised evidence base document? E.g. Viability Assessment

B2 Do you think the Publication Local Plan is:

	Yes	No
Legally compliant		NO
Sound		NO
Complies with the duty to co-operate		NO

B3 Please provide details you have to support your answers above

We recognise that Fareham BC have been forced by the NPPF Standard Method to use the 2014-based household projections from MHCLG to calculate its so-called housing need numbers. CPRE Hampshire fundamentally rejects the using out-of-date projections and has informed the Government at all levels that it is surely in accordance with the NPPF to use up-to-date figures where they are available. We believe that the 2018-based projections are based on a more rigorous analysis by ONS and are superior to those calculated previously by MHCLG.

We expect that the 2021 Census will confirm that the 2018-based projections have more validity, and this will only be reinforced by likely changes in demographics following Brexit and Covid-19. We suggest that Fareham BC should seek an early release of the Census figures as it has such a significant impact on its Local Plan.

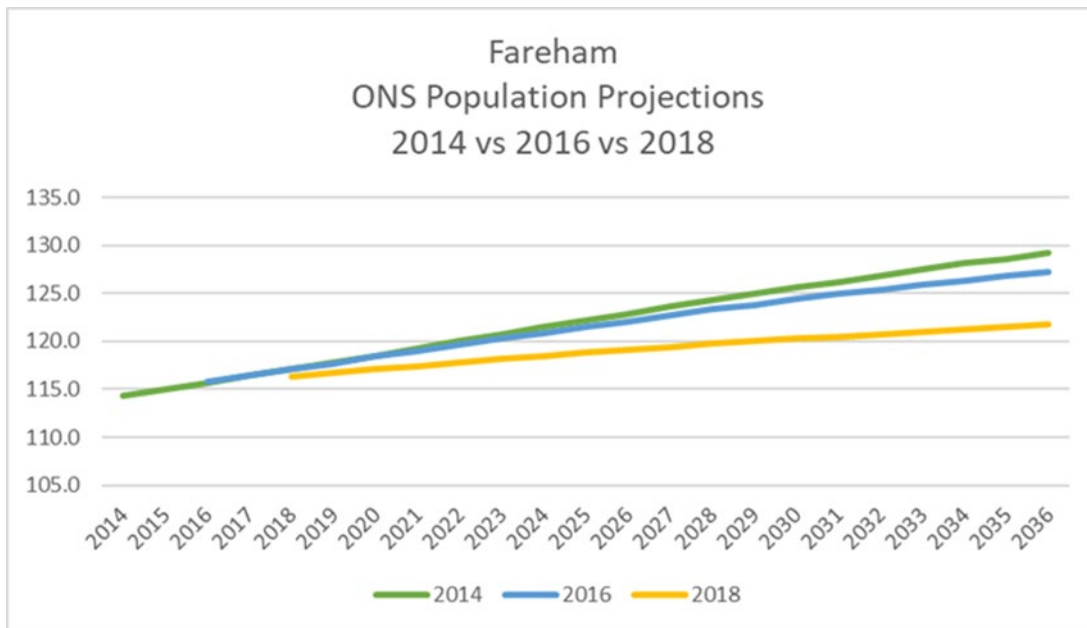
Graph H1_1 below shows the substantial differences in population by using the differing projections for Fareham. Using the most up-to-date data for Fareham would result in an annual housing need of 327, even lower than that expected in the abortive previous Regulation 19 Version Local Plan of December 2020. This difference is so significant, that several large sites in Strategic Gaps might not be required. Over the 16 years of the plan period the comparative numbers are 8,656 with the 2014 projections, and 5,232 with the 2018 ones, a difference of 3,424 dwellings.

CPRE Hampshire therefore believes that Fareham and PFSH should use 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."

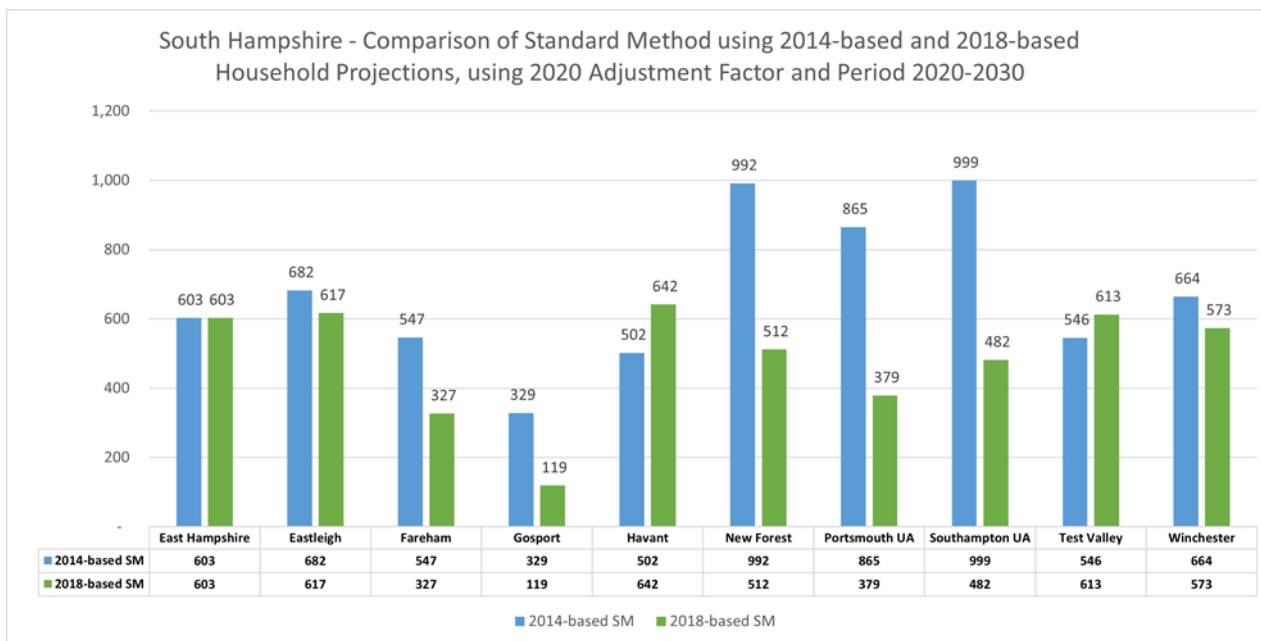
The lowered level of household growth in the 2018-based projections is seen across most of the South Hampshire authorities, not just Fareham, and this will have a substantial impact upon the duty to cooperate vis the PFSH Spatial Strategy. As can be seen from the graph H1_2 below, the outcome of the Standard Method using 2014 and 2018-based projections for all the South Hampshire local authorities shows a substantially lower requirement. Across the six most urban of the PFSH authorities (Southampton, Portsmouth, Gosport, Eastleigh, Havant and Fareham) the difference is some 1,358 dwellings fewer annually. Using the 2014-based projections for those 6 urban authorities gives a housing requirement of 3,924 dwellings but using 2018-projections only 2,566 dpa, not including the metropolitan uplift for Southampton. With a 35% uplift for Southampton, the 2014-based figure would be 4,274, and the 2018-figure would be 2,735, with a difference of 1,539 dpa; an even more extreme difference between the 2 projection dates.

We believe that this must be factored into the next PFSH Spatial Strategy. Notably Portsmouth, who have requested help from Fareham in meeting their housing need, would see a fall in requirements from 865 dpa to 379 dpa. Should this be borne out by the Census results, it is a nonsense for Portsmouth to require any housing to be accommodated by Fareham.

The impact of Brexit, 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.



Graph H1_1



Graph H1_2 (excludes 35% uplift for Southampton)

Furthermore, there has been recent challenge to the ONS population projections in 50 university cities and towns, and this impacts Portsmouth and Southampton, both of which feed into the PfSH joint work. The Office for Statistics Regulation (10th May 2021) has asked ONS to make some more checks on this aspect of their projections. Relevant papers are attached as Appendix B – Letter from Office of Statistics Regulator to ONS, dated 10th May 2021, and Appendix C - OSR Review of Population Estimates and Projections Produced by the ONS, dated May 2021.

In essence the issue relates to how students are handled in university cities. It seems that students have been “counted in” at the start of their studies, but not “counted out” at the end. This is particularly the case for foreign students, whose presence after university does not tie up with home office visa data and HESA destinations surveys.

The bulge in the apparent resulting population is also not corroborated by other data, such as doctor registrations, A&E attendance, new car registrations, school admissions, benefit claims, voter numbers, gas and electricity use etc. In the 50 cities likely to be impacted by these discrepancies, Southampton comes in 9th place, Portsmouth at 23rd.

The inclusion of Portsmouth is particularly relevant to the Fareham Local Plan, as it includes 900 dwellings for Portsmouth, which may not be required. Documents are attached as Appendices B and C which relate to this matter. Checking Portsmouth’s data shows that in 2019, births were lower by 484 than predicted by the 2014-based projections, and deaths were 172 higher. Over 16 years of the plan period, this simple calculation indicates that population might be overestimated by some 10,496 or very approximately 4,400 households.

In 2019, around 644 foreign students were apparently not counted out of the city, based on data from Home Office exit checks. HESA surveys indicate that some students will return to the UK, but only 18% of those who return are likely to remain in Portsmouth.

Significantly, for Fareham to agree to take unmet need from Portsmouth is premature, predating as it does any response from ONS to the request for a review from the Office of Statistics Regulation.

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 Revised Publication Local Plan legally compliant or sound?

Use ONS 2018-based household projections, giving 5,232 dpa. With a buffer of 10% this gives a requirement of 5,755 dpa.

Remove the requirement to take 900 dwellings from Portsmouth CC.

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

Use of up-to-date data is in accordance with Para 31 of the NPPF.

B4c Your suggested revised wording of any policy or text:

Use 5,232 dpa as the annual housing need with a 10% buffer to give a requirement of **5,755 dpa**.

Simply remove the requirement to take housing from Portsmouth CC.

B5a 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

B5b 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 Revised Publication 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 |
| <input type="checkbox"/> | A new housing allocation site | Go to B1d |
| <input type="checkbox"/> | The evidence base | Go to B1e |

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

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 promoting a sustainable pattern of development as set out in the new July 2021 NPPF Para 11a, or for placemaking and beauty as set out in the NPPF Chapter 12, Paras 126 to 134, and is therefore unsound.

Para 126 of the new NPPF states “The creation of high quality, beautiful and sustainable 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 127 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.

Para 22 of the new NPPF may require proposals for Warsash to be looked at over a 30 year period.

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?

It would be in compliance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5a 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

B5b 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 HA55: Land South of Longfield Avenue

B1 Which part of the Revised Publication 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 |
| <input checked="" type="checkbox"/> | A new housing allocation site | Go to B1d |
| <input checked="" type="checkbox"/> | The evidence base | Go to B1e |

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

Housing Allocation Policy: HA55 Land South of Longfield Avenue

B1c Which part of the Policies Map?

Figure 4.4

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 incursion of this proposed site into the Strategic Gap. It will significantly diminish the form and function of the Gap, and lead to an increasing perception of urbanisation in one of the few remaining open spaces between Gosport and Fareham. It is likely to have detrimental impacts upon the ecological network. We note that it has been moved from a green network opportunity to a non-statutory status in the Revised Version of Appendix C, Local Ecological Network Map.

The housing numbers include 900 homes from Portsmouth which CPRE Hampshire believes should be removed from Fareham's housing target. Were this to be done, it would weaken the justification for Fareham BC to allocate such a large site in the Gap. The need to allocate HA55 would be entirely unnecessary should the 2018-based household projections be used to calculate housing targets.

As the site is located some distance from 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 4.4, 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 HA55 will fail to meet any government aspirations for promoting a sustainable pattern of development as set out in the new July 2021 NPPF Para 11a, or for placemaking and beauty as set out in the NPPF Chapter 12, Paras 126 to 134, and is therefore unsound.

Para 126 of the new NPPF states "The creation of high quality, beautiful and sustainable 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 127 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, who have long opposed incursion into the Strategic Gap.

Para 22 of the new NPPF may require proposals for Longfield Road to be looked at over a 30-year period.

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

Remove HA55 from the list of allocations and remove the 900 houses which Fareham has agreed to take from Portsmouth.

In any event, more analysis of the sustainability criteria for the overall development strategy, such as access to public transport is required before sites such as HA55 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 HA55 framework meets NPPF prerequisites.

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

It would be in compliance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5a 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

B5b Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire believes that site HA55 represents an unnecessary incursion into the Strategic Gap and we would like to appear at the Hearings to further explain our case.

POLICY HP4: Five-year housing land supply

B1 Which part of the Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1.

Paragraphs 5.22 to 5.28

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

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

The previous December 2020 version of **Policy HP4** stated "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 new NPPF Para 119, and is therefore unsound. NPPF July 2021 states "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."

CPRE Hampshire suggests that to be in accordance with this aspiration, a sequential approach should be used, even in the event of a lack of a five-year housing land supply.

Our concerns regarding **Policy HP4** have been made much more critical as the word 'may' has been replaced with 'will' in the Revised Submission Version, so all such sites will essentially benefit from permission in principle, with no opportunity for Fareham BC to make any decisions based on sustainability.

The problem is exacerbated by the linkage of **Policy HP4** with **Policy DS1**, particularly **DS1 Criterion (e)** as discussed in CPRE Hampshire's submission in December 2020.

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

It would be in accordance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5a 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

B5b 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 Revised Submission Local Plan 2037.

POLICY E1: Employment Land Provision

B1 Which part of the Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1.

Paragraphs 6.8 to 6.20

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

Policy E1: Employment Land 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 Revised Submission Plan has major changes to the Employment Provision section, referring to the Stantec Report of March 2021. Para 6.10 refers to the PPG for assessing floorspace needs, based on a labour demand model and past take-up. But it then goes on to say in Para 6.10.1 that past-take up would imply a negative need for office space and therefore this was not used in practice. However, this is perverse as not only were past take-up rates falling, but we now have the Class E permitted development rights and likely post-Covid changes in employment patterns, with more people working from home and having virtual meetings. It is to be expected that the lower requirement suggested by past take-up rates is likely to be accelerated rather than an under-estimate. To just say that the requirement within the Revised Local Plan is aspirational takes no account of current circumstances. This is then exacerbated by adding a so-called underdelivery over past years, despite falling take-up rates.

Para 6.20 states “The policies in this Local Plan secure an overprovision of approximately 121,000 sq.m. compared to the requirement identified by the Stantec assessment. Whilst this is a significant quantum, it is considered an acceptable approach to cater for flexibility and choice in supply both in terms of time and type of employment space as set out in the NPPF and PPG.”

CPRE Hampshire suggests that not only was the Stantec assessment likely to be an overestimate of needs, but that to then allocate an over provision of 121,000 sq.m. is entirely unnecessary. Any cursory look at employment sites around South Hampshire shows large sites available for rent, and these should be used in advance of any new provision. This can be demonstrated by looking at websites such as Rightmove (<https://www.rightmove.co.uk/commercial-property-to-let/Fareham.html>) or Property Link (<https://propertylink.estatesgazette.com/commercial-property-for-rent/fareham>).

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

Remove the over-provision of employment land.

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

It would be in accordance with the NPPF.

B4c Your suggested revised wording of any policy or text:

B5a 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

B5b Please outline in the box below why you consider it necessary to take part in the hearing session(s):

CPRE Hampshire would like to appear at the hearing sessions to clarify why we do not believe that the proposed excessive over-provision of employment land is necessary.

STRATEGIC POLICY CC1: Climate Change

B1 Which part of the Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

Paragraphs 8.1 to 8.10, 8.60

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

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. The Revised Submission Version simply adds a comment in Criterion (e) about Building Regulations, but this is merely tinkering around the edges of what could and should be achieved.

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 new NPPF Para 152 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 53 “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.

We are aware that Client Earth wrote to the council in September 2019 to remind them of the legal obligations to address climate change and this objective clearly is in line with that requirement. We look forward to seeing the details of how the council will address climate change in the plan. In particular we would like to see clarity on detailed objectives and recognition of the need to measure progress against the objectives. Hampshire County Council have set out a very detailed plan with objectives on climate change and this may help Fareham BC when they are drawing up their own detailed plans. Ensuring new development is sustainable in terms of location and design will be central to achieving carbon neutrality. This is addressed above and below.

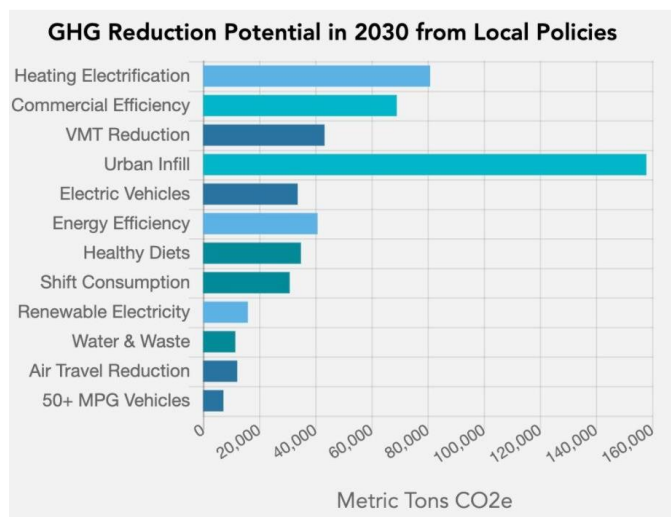
All policies, plans and decisions need to be measured against the objectives of the Climate Change Act 2008. The RTPI have studied this in their January 2021 report ‘NET ZERO TRANSPORT - The role of spatial planning and place-based solutions’. They say: “The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand”.

It might also help to see the outcome of a study carried out by Cool Climate at the University of Berkeley to demonstrate the most substantive action local authorities can take to minimise greenhouse gases, Graph CC_1. Although it used US cities for the study, the principles would apply just as much to Fareham, and showed the single most effective measure is to increase urban infill in preference to car-based development.

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>



Graph CC_1

Figure 10: Cool Climate Network, 2018

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 new NPPF, by including a requirement for mass public transport hubs should 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 new NPPF Para 152 in terms of shaping places that contribute to radical reductions in greenhouse emissions.

B4c Your suggested revised wording of any policy or text:

Policy CC1 (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.

B5a 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

B5b 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 more ambitious spatial strategy for planning housing in Fareham borough, 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 NE2: Biodiversity net gain

B1 Which part of the Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

Paragraphs 9.28 to 9.44

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

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 **YES**

Sound **YES**

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 is sound, and CPRE Hampshire SUPPORTS the requirement for biodiversity net gain as per the forthcoming Environment Act. However, we have significant concerns about the revised text in Para 9.32 about Fareham's ability to assess habitat condition and type, and to enforce any failure to achieve promised improvements. We refer you to the paper by Sophus Zu Ermgassen - *Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England*, June 2021

<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820#>

And the Revised Plan needs to be updated in Para 9.35 and Footnote 85 to reflect the updated Defra Biodiversity Metric 3.0 which has recently been released.

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:

B5a 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

B5b 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 TIN1: Sustainable transport

B1 Which part of the Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

Paragraphs 10.1 to 10.11, 10.13

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

Policy TIN1: Sustainable transport

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 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**.

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/>.

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

CPRE Hampshire recommends strengthening **Policy TIN1**, with an additional Criterion 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 new NPPF, by including a requirement for mass public transport hubs should be the first approach for development, and to enable Fareham to refuse car-dependent applications.

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/>.

CPRE Hampshire does not believe that the additional words added in the Revised Version in Para 10.13 are sufficiently robust to have any appreciable impact on reducing emissions, and do not give Fareham BC the powers to reject development with unsuitable transport provision.

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, and with **Policy CC1**.

B4c Your suggested revised wording of any policy or text:

Policy TIN1 Development will be permitted

(d) 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.

B5a 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

B5b 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 Revised Publication 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
<input type="checkbox"/>	A new housing allocation site	Go to B1d
<input type="checkbox"/>	The evidence base	Go to B1e

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

Paragraphs 11.1 to 11.36

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

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.

The Submission plan will need to be updated to take account of the National Model Design Codes and Para 132 of the NPPF which states that development that is not well designed should be refused permission, especially where it fails to reflect local design policies and government guidance on design.

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**. And would concur with the new NPPF Para 132.

B4c Your suggested revised wording of any policy or text:

B5a 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

B5b 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.