

## **North of Fareham Strategic Development Area (SDA)**

WVCA response to the Sustainability Appraisal Report submitted by Fareham Borough along with other documents to the Secretary of State for independent examination in public by the Planning Inspectorate (Public Enquiry in old speak).

All the documents can be viewed at

[www.fareham.gov.uk/council/departments/planning/ldf/cssreport.aspx](http://www.fareham.gov.uk/council/departments/planning/ldf/cssreport.aspx)

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14 April 2011

## **NORTH OF FAREHAM SDA – HIGH LEVEL SUSTAINABILITY APPRAISAL**

### References:

- A. Planning Policy Statement 1 dated 2005
- B. UE Associates Sustainability Appraisal Scoping Report dated July 2009
- C. Ministerial Statement post Budget 2011– intended Planning System reform
- D. PUSH Commercial Property website – [www.invest-in-portsmouth.co.uk](http://www.invest-in-portsmouth.co.uk)
- E. Natural England post 1998 Soil Classification report (attached as App. 2)
- F. FBC position paper on SDA Infrastructure Funding dated Apr 2011
- G. HCC Local Transport Plan (2011-2031) dated Feb 2011

1. Further to the recent post Budget, Ministerial statement (Ref C), the undersigned contend that the North of Fareham Strategic Development Area (SDA) cannot be considered a “sustainable development” for the reasons as outlined at Appendix 1; accordingly, economic growth ought not take precedence over core sustainability considerations

2. Across all the key areas, namely environment, infrastructure, use of resources and economic sustainability, we submit that the SDA is not a “sustainable development proposal” and that the Core Strategy submission by FBC cannot therefore be sound.

David Walton

For:

Wallington Village Community Association  
The Fareham Society  
The Wickham Society  
Wickham Parish Council  
Knowle Village Residents Association  
Funtley Village Residents Association  
CPRE (Hampshire)  
South Hampshire’s Unheard Voices (SHUV)

Copy to:

Cllr’s K TROTT & P WHITTLE (Fareham East)

Cllr’s P & J BRYANT (Fareham North)

Appendices:

1. High level Sustainability Appraisal
2. Agricultural land Classification (ALC) – SDA area

Appendix 1 to WVCA Letter SDA 4/2011 dated 14 Apr 2011

## **HIGH LEVEL SUSTAINABILITY APPRAISAL**

A sustainable plan is a structured course of action that is designed to meet the current needs of those concerned, to ensure that the impact of development on the social fabric of communities is considered and taken into account, while not taking away the needs of future generations. A sustainability plan often involves making the most efficient use of available resources, while also seeking to ensure that the impact for later generations is a positive benefit. (PPS1 refers)

### **1.0 Traffic impact**

A Traffic Impact Assessment has yet to be conducted; despite the clear statement at Ref. B (Para 4.3.1) some 18 months ago, that congestion on strategic (M27) and local road networks is likely to be a major issue.

The same report (4.3.2) also highlighted above average levels of car ownership in the Fareham area and high levels of “out commuting”. It similarly noted that ‘the resultant congestion on local roads also adversely affects the quality of Public Transport provision’. Put simply, the Bus Rapid Transit (BRT), even if funded (see below) will be severely obstructed in peak hours traffic as is already the case for today’s road users, let alone those after 2016.

One of the very few infrastructure related costings that has been established, is that of the primary access road to/from Junction 11 of the M27. This unfunded aspiration is assessed as costing £25M - £40M, dependent upon which route is chosen and has now been deferred by 5 years until 2021. Accordingly, the location of the proposed SDA will place an intolerable burden on an already congested single carriageway A32 and Junction 10 of the M27. This Junction has very limited functionality and there are currently no funding bids, let alone funding streams, to improve this situation. ***Air quality, sustainability and journey times will all suffer as a result.***

## **2.0 Transport (BRT)**

In similar vein, Bus Rapid Transit (BRT) is crucial to the SDA's sustainability; the SDA related phases of BRT are all unfunded and funding cannot be assumed.

## **3.0 Use of water and sewage systems**

The type of Sustainable Urban Drainage System (SUDS) has been neither defined nor approved by the Environment Agency. Likewise, the downstream Flooding Risk has yet to be quantified.

Further unresolved infrastructure issues include potable water supply and wastewater treatment.

## **4.0 Employment**

A prime example as to how little consideration has been given to the employment opportunities within the SDA and therefore it's sustainability, is the allocation of some 30,000sqm to B8 (Warehouse) use. To suggest such use within the confines of an already constrained SDA is clearly ill-considered given that B8 usage generates very few employment opportunities per hectare of footprint. Currently, there is ***in excess*** of 150,000 sq ft of vacant Warehousing within **2** miles of Fareham Town centre (Ref D). To propose adding to this overcapacity by building more B8 Units on prime agricultural land, when there is already a massive over-capacity of both B8 (and indeed Office space) in the immediate area, makes little if any sense.

It is our view that there are insufficient employment opportunities within the core SDA to make the development sustainable. This will result in significant travel in & out of the area, all impacting negatively on the environment and peoples' quality of life (see points 1.0 and 2.0 above).

## **5.0 Arable land usage**

We refer to a report from Natural England who now holds all soil survey data. The most recent (post 1998) and detailed ALC, is attached at Appendix 2.

You will see that the majority of the SDA area is classed as 3a, only the area adjoining the motorway being 3b. These data contradict the FBC assertion that “most of the SDA land is 3b or worse” and requires further and immediate clarification. It would appear that this assertion by FBC is somewhat disingenuous if not factually incorrect and this may well explain why thus far, DEFRA have failed to raise objections to the SDA. Government policy, set out in PPS7, states that, “where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations”. Furthermore, the SDA proposal contradicts the Council’s own policy (CS15) which seeks to protect 3a grade land.

## **6.0 Affordable housing vs. economic growth**

The FBC Core Strategy submission manifestly fails to explain whether it’s rationale for the development, which was changed radically in Nov 2010, is either:-

The Partnership for Urban South Hampshire (PUSH) aspiration to “grow” the economy of an already overdeveloped and indeed the 2<sup>nd</sup> most affluent Borough in Hampshire (HCC data);       **Or**

The need to satisfy Fareham Borough Council’s apparent and completely unsubstantiated “need for affordable housing”.

In terms of both infrastructure requirements and sustainability, there are very significant differences between options a) and b) above. Given the absolute presumption in favour of the SDA that is prevalent through the Core Strategy submission and the fact that alternatives have not been considered; none of these issues have yet to be properly explored.

## **7.0 Quality of life for current and future residents**

The SDA will adversely affect the quality of life of **existing** residents in Fareham's Northern and Eastern Wards, who will have to endure massive increases in traffic congestion on roads that are already close to gridlock in the peak hours and who will lose their views over prime farming land. The villages of Knowle and Funtley will disappear amidst a sea of houses and the SDA (aka Solent City) will encroach within 0.5 miles of and adversely affect the historic and vibrant market town of Wickham.

## **8.0 Location of the SDA**

A further consequence of the poorly chosen location for the SDA, is that it's very limited access will generate disproportionately higher infrastructure costs, which from a Developer's perspective is likely to adversely impact on viability, which is as yet unproven.

The enormous risk associated with funding the SDA infrastructure is well captured at Ref F and the HCC Local Transport Plan (Ref G) reinforces this stark prognosis, contains no funding streams for SDA related work in the period 2011 – 2014 and offers little succour thereafter. A similarly high risk presumption within the FBC submission is the notion that were the SDA to be approved, then no further development will be required or indeed allowed elsewhere within the Borough; this presumption is not considered to be enforceable and ought not to be a material consideration.

## **9.0 SE Plan**

Sections 16.2 – 16.7, together with 16.7 and 16.23 raise a broad range of sustainability issues that have yet to be adequately addressed and furthermore, Policy SH4 iii clearly states “excellent access to the North of Fareham SDA is to be secured in advance of any development”. Obviously deferral of the primary access road until 2021 directly contradicts this policy.