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My reference GBCREG18

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Your reference Local Plan

Date 3 December 2021

Email [REDACTED]

Dear Jason,

Gosport Borough Council Draft Local Plan (Regulation 18) Consultation

Hampshire County Council welcomes the opportunity to provide the following comments in its capacity as local highway authority and minerals and waste planning authority for Hampshire.

Local Highway Authority

The County Council's primary concern as local highway authority is the safe and efficient use, management and maintenance of the local highway network and ensuring that all new development mitigates its impact on the Hampshire highway network.

Transport Assessment

A Gosport Borough Local Plan – SRTM Modelling report (2019) forms part of the evidence base for the local plan. The County Council supports the use of the strategic model known as the Sub Regional Transport Model (SRTM) for assessing the cumulative strategic impact of the Local Plan development strategy and proposed land use allocations. The SRTM has been used to compare a Baseline scenario with two potential growth scenarios to 2036; Scenario 1 includes 2,503 additional dwellings and Scenario 2 includes 3,463 additional dwellings. The Gosport Borough local plan 2038 proposes 3,500 additional dwellings.

An Interim Transport Background Paper: Consideration of Initial Transport Modelling (2021) based on the SRTM Modelling report is also part of the evidence base and provides a high-level summary of the Baseline and Do Minimum SRTM modelling. The County Council acknowledges that this interim report is in advance of a borough-wide Transport Assessment (TA) which is yet to be commissioned.

The TA will need to assess the strategic impacts of the allocations and propose a package of mitigation measures applying a sequential approach starting with active travel and public transport options before considering highway capacity options. The sequential approach to transport mitigation is in line with the policy agenda from central government on decarbonising transport (DfT July 2021 Decarbonising Transport) and from County Council on the role of transport in reducing transport emissions (Hampshire County Council July 2020 Climate Change Strategy and Action Plan) and in the emerging Hampshire Local Transport Plan 4.

Development strategy

The County Council supports the local plan Vision of Gosport in 2038 which includes an emphasis on 'reduced out-commuting and sustainable ways of getting around' supported by local plan objective 5 to 'Improve Transport and Accessibility'.

The County Council recognises the limited opportunities for large housing sites in a borough which is densely built up within a peninsula geography and therefore supports the key principle in Policy D2: Development Strategy and Policy D3: Urban Regeneration Areas, of directing new development to brownfield land within the urban areas. The focus on brownfield land maximises the opportunities to reduce the need to travel, provide access by sustainable modes of transport and reduce the reliance on the private car.

However, the very nature of some of the brownfield sites in urban areas especially those proposed on former military forts and Royal Navy buildings means that they are not all in locations where public transport and local services are easily accessible by sustainable transport modes, for example the Haslar peninsular sites. The County Council would therefore welcome the opportunity to be involved with the master planning for the strategic sites. The County Council's emerging Local Transport Plan 4 (LTP4) advocates the use of master planning to reduce car dependency and to design developments around people not cars.

Sustainable Transport

In the context of the Borough Council's commitment to tackle climate change the draft local plan provides the ideal opportunity to provide significant cycling, walking and public transport infrastructure improvements within the Borough.

The County Council wants to continue the joint working with the Borough on extending the Eclipse busway and future expansion of the South East Hampshire Rapid Transit

network (SEHRT) as part of providing sustainable access to the strategic development sites in the Borough and adjoining boroughs. The County Council therefore supports land safeguarding (Policy A6) along the existing shared cycle route from Rowner Road to Lees Lane for a future extension of SEHRT and the Eclipse busway towards Gosport town centre.

Policy D3 Urban Regeneration Areas

Policy D3 Urban Regeneration Areas applies to all the strategic sites and should include a specific transport policy to promote sustainable transport and alternatives to the car and provide transport choice. Policy D3 should also include a specific reference to the future extension the SEHRT network to serve the Harbour and Daedalus Regeneration Areas.

Policy D4 Green Infrastructure Network

This policy should include reference to providing core pedestrian and cycle routes to link to the Urban Regeneration Areas and provide east to west routes. The Gosport Local Cycling and Walking Infrastructure Plan (LCWIP) will provide the detail on the local network on core cycle routes and suggested improvements.

Policy D6 Gosport Strategic Open Spaces

This policy should include reference to access by bus connections as part of making the sites accessible for all. More opportunity should be made of the Alver valley cycle routes to make them suitable for commuter cyclists as well as leisure and recreational uses.

Policy D11: Securing Infrastructure

The objective of this policy and the need for on- and off-site transport infrastructure is supported. Specific reference should be made in the policy and supporting text to extending the Eclipse busway and to improving walking and cycling links to the busway in order to maximise opportunities for modal choice and to reduce reliance on the private car.

Policy D12: Accessibility to new development

This policy states that developments should prioritise access by walking, cycling and public transport. However, the emphasis of how the policy deals with increased levels of travel demand should be more towards providing sustainable access rather than accommodating the travel demand through highway capacity improvements. The requirement for transport improvements for new developments should refer to a sequential approach to necessary mitigation measures by starting with active travel and public transport options before considering highway capacity options.

Policy D12

The supporting text of this policy should refer to the new cycle design guidance and assessments as set out in Local Transport Note 1/20. Reference should also be made to the Gosport LCWIP which is currently in draft form.

The supporting text in para 2.13.2 should delete reference to programmed proposals in the Hampshire Local Transport Plan (LTP). Proposed transport schemes will be developed through area transport strategies and area action plans. The LTP4 will also provide guidance on how to prioritise transport schemes for funding and scheme development.

Policy D9 Design

Point 2d on Movement should include reference to the latest government design guidelines on cycle facilities as part of development 'supporting improved accessibility for all users and prioritising walking, cycling and public transport'.

Strategic Development Sites (SS1 – SS11)

All the Strategic Development Site policies (SS1 to SS11) need to outline how the individual sites will increase sustainable travel and include details on the types of transport mitigation schemes needed to achieve the sustainable travel aims. The policies would benefit from referencing the role of public transport and should include provision for off-site bus, walking and cycling connections to the local bus network, Eclipse Busway and wider SEHRT proposals. The development proposals should be informed by individual site masterplans and an assessment of the overall accessibility and connectivity of a site. Pedestrian and cycle routes to serve the sites must be considered as part of the development of a wider network of pedestrian and cycle routes including the cycle routes and walking zones identified in the Gosport LCWIP.

Site-specific TAs will be required at the planning application stage to fully assess the impact the development sites and to apply the sequential approach to assessing the mitigation measures required starting with active travel and public transport options before considering highway capacity options.

Harbour Regeneration Area –

Policy SS1: Gosport Waterfront – Marine employment

Policy SS2: Gosport Waterfront - Mixed use redevelopment

The County Council supports the focus of higher densities of development in Gosport town centre, on brownfield land locations so long as these are supported by improvements to the bus infrastructure, the Gosport ferry transport hub and walking and cycling networks including innovative approaches to transport parking and provision.

These policies need to include a specific reference to the provision for access by sustainable transport. The new employment uses will generate travel demand which will need to be mitigated through a range of transport measures with an emphasis on sustainable modes.

The County Council suggests that it would be helpful for the policy or supporting text to refer to the potential pedestrian routes shown on the accompanying maps titled Plan 10, 11 and 12.

- Plan 10 Gosport Marina should also include labels for Gosport ferry terminal, the proposed new bus station plus potential cycle links to serve the sites.
- Plan 12 Haslar Marina shows a new pedestrian bridge link but this is not referred to in either the policy or supporting text.

Gosport Town Centre Policy SS3

The County Council support the need for a parking strategy as described in para 3.4.10 to assess the amount and location of car parks and which ones can be released for redevelopment. The strategy should include an evaluation of on-street parking in the context of the potential to provide new on road cycle and bus infrastructure. The parking strategy should be produced in parallel with the progression of the Local Plan.

The County Council also support policy 3hii on retaining the open axis between the High Street and ferry pontoon as this strengthens the need to improve the pedestrian and cycle links from the bus and ferry terminal to the high street.

The County Council notes the aspirations for Gosport Bus station in Point 3 of policy SS3 and the supporting text in para 3.4.21, and would recommend that the supporting text makes it explicit what elements of Policy SS3 form part of the TCF funding so that the reader can understand what is scheduled for delivery and implementation already in accordance with this policy.

The County Council considers that point 3e of this policy is not required (reference to accessible bus station) as this is covered by point 3a (A purpose-built facility incorporating a new multi-modal transport hub).

Plan 13 Gosport town centre is not referred to in the supporting text. The plan should also include bus and cycle links which it currently does not.

Haslar Peninsula (SS4 to SS9)

The County Council recognises that the mixed-use redevelopment (including 760 new dwellings) on the Haslar peninsular is constrained by the existing road network and therefore development proposals should include innovative approaches to providing appropriate levels of accessibility and connectivity, commensurate with the limited

capacity of the existing surrounding transport infrastructure provision, including the most constraining feature of the single lane Haslar Bridge. The County Council expects to see a range of sustainable and innovative transport alternatives to the private car with an emphasis on high quality pedestrian and cycle routes which will be vital to support development on the peninsula.

Policy SS4 Fort Blockhouse and Haslar Gunboat sheds and SS5 Fort Blockhouse

An evaluation of the car parking proposals in Policy 2d strategic surface vehicular parking area and 3e park and ride scheme need to be included in the proposed parking strategy to understand the potential of the park and ride site to reduce car trips and how the park and ride site and the new surface car park will serve Haslar Peninsula and Gosport town centre. There is also potential to expand the current Park and Float trial with the Gosport ferry.

Policy 2c refers to an off-road bus stop to serve the site but there is no mention of how bus access or bus priority will be achieved or if this is linked to either the proposed park and ride site or the proposed new surface car park. It is essential to involve the bus operators in the development of the site Masterplan.

Supporting text para 3.6.23 for Policy 3d refers to development on the Haslar peninsular needing to mitigate any adverse impact on the Strategic Road Network (SRN) or the rest of the highway network. It is recommended that reference to the SRN is deleted as the nearest section of SRN is the M27.

The County Council recommends that Point 4 of Policy SS5 Fort Blockhouse includes additional wording to cover access by sustainable transport.

Policy SS6 Royal Haslar Hospital

The County Council recommends that Policy SS6 includes additional wording to cover access by sustainable transport.

Policy SS7 Haslar Barracks

The County Council recommends that Policy SS7 includes additional wording to cover access by sustainable transport.

The County Council supports the provision of new pedestrian and cycle routes between Fort Road and the Solent shoreline path. These new routes should be incorporated into the Masterplan and site layouts to improve permeability and public access.

Policy SS8 The Piggeries

The County Council recommends that Policy SS8 includes additional wording to cover access by sustainable transport.

Policy SS9 Haslar Marine Technology Park

The County Council recommends that Policy SS9 includes additional wording to cover access by sustainable transport.

Rowner and HMS Sultan Regeneration Area and Policy SS10

The County Council recommends that Policy SS10 includes specific reference to providing connections to the Eclipse busway by sustainable transport. Additionally, the Policies should include provision of new pedestrian and cycle route at northern end of the site from Grange Road to Brune Park Community School along the southern boundary of the Huhtamaki site.

Daedalus Regeneration Area - Daedalus Policy SS11

The County Council supports intensified development at Daedalus as the main focus for employment growth so long as there is improved provision for sustainable transport both within the site and surrounding area, including connections to the Eclipse Busway services.

Climate Change and Air pollution

County Council supports the approach to climate change in policy D1:Adaptation and mitigation to climate change. The draft Plan correctly identifies road transport emissions as the main source of air pollution which is relevant to the County Council's responsibilities as both highway and public health authority.

Infrastructure Development Plan 2020

The Transport section of IDP identifies the transport mitigation required to meet the planned growth set out in the draft local plan. The County Council supports the IDP transport proposals including a new bus interchange at Gosport bus station, extensions to the Eclipse busway and improved pedestrian and cycle routes.

Minerals and Waste Planning Authority

Hampshire County Council, as the Mineral and Waste Planning Authority welcomes the inclusion of the Waste and Material Resources Policy (Policy LE14), which specifically references the Hampshire Minerals and Waste Plan, and offers its support in the future development of this policy should Gosport Borough Council require it.

With reference to the explanation of Policy LE14, in particular the list of safeguarded minerals and waste sites within the Gosport Borough, it should be noted that the Material Recovery Facility at the Cranbourne Industrial Estate has been removed from the safeguarded sites list as it is believed to no longer be operating, and ownership of the site has been transferred to a builders merchant. For the most up-to-date safeguarded sites list, please see the Hampshire County Council website, which is updated periodically: [Minerals and waste sites in Hampshire | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/minerals-waste-sites)

Upon review of the specific sites proposed for both housing and employment uses, the County Council has the following comments to make:

Strategic Housing Site AG015b – Haslar Barrack

This site, noted on the mapping on Page 41 of the Strategic Housing Land Availability Assessment (SHLAA) Appendix 1, lies mostly within the Minerals Safeguarding Area (MSA) as defined under Policy 15 (Safeguarding – mineral resources) of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). Whilst the area of the MSA within the site boundary would not be considered to be a viable prior extraction opportunity, the County Council, would like to encourage the full consideration of the opportunities for mineral extraction prior to and as part of any proposed development.

It would be expected that high quality material, such as sand, gravel and soft sand would be processed and used for construction purposes, while lower quality material could be used for fill or similar. Particular opportunities may lie in the recovery of mineral deposits uncovered during the preparation and construction phases of a project, for example through the excavation of footings or trenches for buildings, roads, landscaping and utility infrastructure associated with the development. To this end, the County Council request that wording is added to any allocation for development of site AG015b, that incidental extraction is required to be considered by the applicant/developer and that the submission of construction management plans or similar detailing a method for ensuring that minerals that can be viably recovered during the development operations are recovered and put to beneficial use and a method to record the quantity of recovered mineral (re-use on site or off site) and to report this data to the County Council.

Strategic Housing Site BH009j – HMS Sultan

It is noted in the SHLAA Appendix 2 – Developable SHLAA sites that there are no developable SHLAA Sites in the Brockhurst area of Gosport, and that the other HMS Sultan land parcels are noted in Appendix 3 - Discounted SHLAA sites of the SHLAA.

However, site BH009j is not noted in either Appendix 2 or 3 of the SHLAA. This site is almost fully within the Minerals Safeguarding Area and the County Council seeks clarity on the assessment results for this site.

Existing Employment Land Site E/HD/2 – Quay Lane Industrial Estate

As noted in the E/HD/2 line of Table 30 in the Economic Development Needs Assessment and Economic Land Availability Assessment, the Quay Lane Industrial Estate is identified as having the potential for intensification of the employment uses.

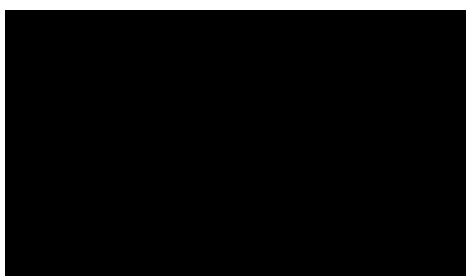
As noted in the explanation of Policy LE14 in the main draft Local Plan document a safeguarded metal recycling site lies within Quay Lane Industrial Estate. This site, operated by A. W. Smith (Gosport) Ltd., is safeguarded under Policy 26 (Safeguarding – waste infrastructure) of the HMWP, as such, it will need to be taken into account as part of any development within its safeguarded buffer zone.

Should an application come forward for this area the County Council would expect to see how the safeguarded site has been considered and if mitigation measures are required to ensure that the safeguarded site can continue operating without hindrance. It is therefore requested that wording is included in the any allocation of the Quay Lane Industrial Estate highlighting this issue and the requirement for the safeguarded sites consideration.

For further information on Hampshire County Council’s approach to minerals and waste safeguarding please see the Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document (SPD) on our website: [Supplementary planning documents | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/Supplementary-planning-documents).

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact my colleague Neil Massie on [REDACTED] who is providing a coordinating role for the County Council on this project.

Yours sincerely,



Stuart Jarvis
Director of Economy, Transport and Environment