

Fareham Borough Council Local Plan Examination **Council's Response to Inspector's Matters and Issues**

Matter 6 Housing Allocations

Matter 6.7

HA42 Land South of Cams Alders

24. What is the justification for this allocation located on the Fort Fareham Grassland SINC bearing in mind reasonable alternatives?

- 24.1 Fareham South is an area of high need for further affordable housing, particularly for sheltered housing provision. Specialist older person housing is already intended at the nearby Land south of Longfield Avenue site (extra care housing) and this site would provide an opportunity for more independent older persons in need of affordable housing, where the demand for this type of housing is the greatest in the Fareham South, paragraphs 2.27 and 2.28 of the Specialist Housing Background Paper and paragraph 4.21 of the Plan.
- 24.2 The Council are the principal landowner in this location and will seek, in consultation with the Council's Ecologist, to develop less ecologically sensitive areas of the site. Any losses or impacts to the SINC will be kept to a minimum with the remainder of the SINC being retained and enhanced in line with Policy NE1. Further open space close to the site and within the Council's control, presents an opportunity to provide biodiversity net gain and compensatory habitat in line with policies NE1 and NE2. This could be achieved through a wider network of ecological provision in the Fort Fareham/Cams Alders area with appropriate Environmental Management in place. This would provide a strategic and managed improvement to the current ecological baseline within the area which can be secured as part of the planning application process. Any partial loss of the SINC would be justified on the basis of a detailed management plan to improve the ecological features of the SINC lost through the development and the creation of compensatory habitat as required.

25. How has the site boundary been determined?

- 25.1 The Council undertook a design exercise that demonstrated how the accommodation needs for local authority sheltered accommodation could be delivered and limited the impact upon the constraints of the site. The boundary reflects the constraint assessment undertaken, in particular the location and canopy spread of trees and the associated segregation of open, developable land. The latter includes space to physically link parcels with footpath connections, which reflects the operational requirements of sheltered housing

HA44 Assheton Court

26. The site is partly located within Flood Zone 2 and Flood Zone 3. Is it an appropriate location for a sheltered housing development?

- 26.1 This site is already in established residential sheltered housing use, but the building is in need of renovation to ensure it is fit for purpose. The Council owns the site and wishes to redevelop the building to make better provision for the existing residents as well as meet some of the additional need in a location appropriate for this type of residential use (such as being within easy access to shops and services).
- 26.2 The current building has zero flood resilience/mitigation measures in place. The finished floor level of the current building does not take into account the current or future flood risk levels. Due to the site being identified as partly within flood zones 2 & 3 and being at risk of

future flood as a result of climate change (as evidenced by CC003), policy criterion d) specifies that a flood risk assessment is required, and appropriate mitigation measures included in the design of the properties. The site promoter has provided their draft Sequential and Exception Test for the site (FBC037). This report states that proposals for the redevelopment of the site will result in a reduction of sleeping accommodation on the ground floor (16 units reduced to 14), a higher finished ground floor level, and will include further flood resilience and mitigation measures. This will greatly reduce the flood risk to current and future occupiers compared to the current situation, whilst also helping to meet some of the sheltered housing need in the area.

- 26.3 The draft Sequential and Exception Test for the site also demonstrates the lack of suitable alternative sites at lesser risk of flooding and through the exception test it demonstrates how the residual flood risk will be far less than with the current situation. Although the overall number of units will increase, it is understood that this enables the viability of the redevelopment and is intended to address the sheltered housing need. Additionally, the Exception Test explains how the ownership and management of the building will ensure residents are on the flood warning system. A site-specific FRA is also in advanced stages of preparation, to support the submission of a planning application on or before summer 2022.
- 26.4 The Environment Agency (EA) have raised concerns in relation to flood risk to this site in their response to consultations on the Local Plan. The Council recognises the concerns of the EA and have entered into a SoCG (SCG009). It has been agreed that in relation to HA44 Assheton Court, the Council will work with the site promoter to ensure a full FRA is carried out. The Environment Agency will be consulted on any planning application for this site which should provide the evidence required to demonstrate safe delivery of development.
- 26.5 The site promoter is now in the process of consulting the EA on the draft Sequential and Exception Test and the Flood Risk Assessment and plans associated with the planning application that is being prepared for the site. The Council could update the inspector on any outcomes of this meeting when information is available.
- 26.6 Given the need for work to be carried out to the existing building on the site, the unmet sheltered housing need in Portchester, redevelopment of the brownfield site providing improved flood resilience and mitigation measures currently not in place, the Council working with the site promoter and the EA being consulted as part of the planning process for the site (in accordance with the signed SoCG), the Council is content it can be demonstrated as an appropriate location for development.

27. How has the limited capacity of the local sewage infrastructure been considered?

- 27.1 In response to consultations on the Local Plan, Southern Water have raised the issue of limited capacity of the local Sewerage infrastructure at present, to accommodate the proposed development on this site. However, it was recognised that this is not necessarily a constraint provided appropriate measures are in place such as notifying Southern Water of the proposed development to ensure enough time is allowed to upsize the local sewerage infrastructure. It should be noted that the issue raised is associated with the immediate local sewerage infrastructure and not the ability of Peel Common Wastewater Treatment Works to accommodate the increases in foul water.
- 27.2 The Council felt it was necessary to produce a Statement of Common Ground (SoCG) with Southern Water to resolve this particular issue (SCG010). Within the Areas of Agreement section, in particular paragraph 5.2 of the SoCG, agreement has been reached with Southern Water that paragraph 11.53 in the Plan in conjunction with Policy TIN4, ensures

developers engage and collaborate with Southern Water to ensure there is adequate wastewater infrastructure and water supply capacity to serve development or adequate provision can be made available. The Council and Southern Water agree that planning conditions could also be employed to help facilitate this. In addition, it was agreed that the Council's Development Management team will be made aware of Southern Water's comments on the allocations in the Plan which are being raised as having local sewage capacity issues so that consultation on future planning applications be sought.

- 27.3 Considering the above, the Council is content that the issue of the current capacity of the local sewerage infrastructure can be satisfactorily resolved.

HA49 Menin House, Privett Road

28.What is the Fareham Housing Greener Policy? Is it a development plan document?

- 28.1 The Fareham Housing Greener Policy is a document which was adopted by the Council on 16th December 2019. The policy provides clarity on how Fareham Housing (the affordable housing department of Fareham Borough Council) will make a contribution to mitigating the effects of climate change and undertake preparations in anticipation of new legislation. It sets out a series of principles to provide a framework to guide users through the measures Fareham Housing is committed to. Although the policy is not a development plan document, it is an adopted policy document of the Council and is a measure to help address climate change in relation to the Council's own housing stock.

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HA50 Land North of Henry Cort Drive

30.What is the Fareham Housing Greener Policy? Is it a development plan document?

- 30.1 See response to Q25 – HA49 Menin House, Privett Road

31.How has the limited capacity of the local sewage infrastructure been considered?

- 31.1 In response to consultations on the Local Plan, Southern Water have raised the issue of limited capacity of the local Sewerage infrastructure at present, to accommodate the proposed development on this site. However, it was recognised that this is not necessarily a constraint provided appropriate measures are in place such as notifying Southern Water of the proposed development to ensure enough time is allowed to upsize the local sewerage infrastructure. It should be noted that the issue raised is associated with the immediate local sewage infrastructure and not the ability of Peel Common Wastewater Treatment Works to accommodate the increases in foul water.
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- 31.3 Considering the above, the Council is content that the issue of the current capacity of the local sewerage infrastructure can be satisfactorily resolved.

32.What impact would the development have on parking in the local area?

- 32.1 The Council considers the impact would be negligible. The new development will provide adequate parking facilities to meet its needs, and the policy requires for the replacement, improved community facilities and open space to the south of Henry Cort drive. This will include parking provision suitable to meet the needs of the replacement community centre.

33.Is the proposed density appropriate given the sites context in a Strategic Gap?

- 33.1 Although this site is located within the Strategic Gap, (Area 2a Meon Gap, page 134 of Technical Review (DS003) it is visually self-contained and isolated from the wider Strategic Gap. It is bounded by a strong tree line to the north and by a tree lined road and bund to the south. To the west is Henry Cort secondary school, which includes a cluster of school buildings of variable scales. As a result, it does not benefit from the long views into and associated with the wider countryside and across to the settlement of Segensworth on the western edge of the gap as described in the Technical Review. It should also be noted that the site contains a number of urbanising structures including a community building, flood lit petanque court, car park and hard surfaced and fenced games and play areas. This results in a visual character reflective of its local facilities function associated with the residential community rather than the undeveloped nature of the fields beyond. Taking account of the above, the Council considers that the site it is not integral to the maintenance of settlement identity.
- 33.2 In addition, the Council undertook a design exercise that demonstrated how the accommodation needs for an affordable housing development could be delivered. The Council's affordable housing strategy identifies an emphasis on smaller units as part of a mix of dwellings, and this site is considered suitable to address a need in the ward. The design

exercise demonstrated that development could be achieved on site, with the retention of boundary trees and vegetation together with appropriate parking provision.

- 33.2 Therefore the Council consider that the proposed density is appropriate to meet local need, whilst recognising the site's context in the Strategic Gap.

HA51 Redoubt Court, Fort Fareham Road

34.What evidence is there to support the loss of public open space?

- 34.1 The Council's Open Space Study 2018 (NE010) classifies the open space within the redline boundary of the allocation as parks and amenity open space. Table 12 of the Council's Open Space Study highlights that there is a very good provision of 9.75ha of parks and amenity open space in the Fareham South ward which is in excess of the minimum standards set out in Policy NE10, Table 9.1. The Council considers the open space position in Fareham South Ward to be such that the policy test within bullet point one of Policy NE10 could be overcome meaning it could be clearly shown that the relevant part of the open space at Redoubt Court is surplus to local requirements and would not be required to meet the open space needs of residents in the long-term. It should also be recognised that development of part of this open space Through the careful redesign of the site, as part of the planning application process, there is an opportunity to greatly improve the quality of elements of the open space provision to make it more attractive and useable for nearby residents which is in accordance with policy NE10 of the Plan.
- 34.2 Fareham Housing, the Council's affordable housing department, have advised that the site is in an area of high need for further affordable housing. The existing properties at Redoubt Court require substantial refurbishment (including full removal and replacement of front and back walls due to the original non-standard construction type). A complete redevelopment or significant alteration to the existing properties is the preferred approach to address existing structural and thermal efficiency issues, and to also provide more affordable homes. The financial feasibility will be improved through a net gain in affordable homes.

35.What is the Fareham Housing Greener Policy? Is it a development plan document?

- 35.1 See response to Q25 – HA49 Menin House, Privett Road

36.Should the height of development be restricted to 2 storeys to safeguard Fort Fareham?

- 36.1 This matter is covered within the Statement of Common Ground (SoCG) (SCG004) between the Council and Historic England. The Council would like to draw attention to paragraphs 3.7, 3.8 and 4.1 of the SoCG which state that the Council recognise concerns raised by Historic England in relation to building heights at this site and the parties have reached agreement that a further criterion limiting building heights to 2 - 2.5 stories could be added to the housing allocation under a minor modification upon adoption of the plan.

HA52 Land west of Dore Avenue, Portchester

37.What evidence is there to support the loss of public open space?

- 37.1 The Council's Open Space Study 2018 (NE010) classifies the open space within the redline boundary of the allocation as natural greenspace. Table 11 indicates that there is a significant provision of 24.60ha of natural greenspace in the Portchester West ward which is in excess of the minimum standards set out in Policy NE10, Table 9.1. The Council

considers the open space position in Portchester West Ward to be such that the policy test within bullet point one of Policy NE10 could be overcome, in that evidence can be provided that the open space at HA52 Dore Avenue is surplus to local requirements and would not be required to meet the open space needs of residents in the long-term.

38. What is the Fareham Housing Greener Policy? Is it a development plan document?

38.1 See response to Q25 – HA49 Menin House, Privett Road

HA54 Land east of Crofton Cemetery and west of Peake Lane

39. Is the development of this site in a Strategic Gap justified? What are the implications in terms of visual amenity and the local character?

39.1 The Technical Review of Areas of Special Landscape (DS003 - Chapter 4 – The Fareham Stubbington Gap – page 98), identified the potential to make modification to the settlement boundary of North Stubbington at this location without risking the integrity of the gap. As part of the Local Plan Review, the Council have made an amendment to the strategic gap boundary as outlined in the Technical Review and therefore the site would not fall within the strategic gap upon adoption of the Plan.

39.2 It should also be noted that planning permission for 206 dwellings has been allowed on appeal. (Planning ref P/21/1121/OA).

40. On what basis has the indicative yield of 180 dwellings been determined?

40.1 The indicative yield of the site has been determined as set out in the SHELAA (DS004) methodology, Stage 2: Site Assessment, Calculating Development potential (pages 9-10), using 30dph but with the developable area of the site reduced to 30%, being a proportion of the southern part of the site, which would fall within the amended settlement boundary, allowing for green infrastructure and with the northern area considered appropriate for Brent Geese and Solent Wader habitat mitigation.

41. What evidence is there to demonstrate the impact of the development on the local highway network either alone or in combination with other allocations (specifically HA55). If that impact is a negative one, would suitable mitigation measures address the issues?

41.1 The Strategic Transport Assessment (TOI008) figure 7.2 shows the quantum of development included in the assessment taking account of Local Plan growth. Whilst this does not specifically identify site allocations it shows the quantum of development for different modelling zones across the borough. The modelling zones which include allocations HA54 and HA55 were modelled for 1,320 dwellings. The model loads traffic onto the network at specified points. This allows for the cumulative impact of all the local plan development to be considered across the road network.

41.2 Table 11-2 of the Strategic Transport Assessment (TOI008) shows the junctions that are impacted by Local Plan development and whether they require mitigation. Table 11-3 and Figure 11-1 show the junctions requiring mitigation following criteria agreed with the Highway Authority for assessing the impact. The resulting conclusion is that there are no junctions in the immediate vicinity of the site that are identified as requiring mitigation. Therefore, there is not considered to be a requirement for strategic highway improvements from this site (or HA55).

- 41.3 The Updated Strategic Transport Assessment SRTM Do Minimum Report (FBC016) figure 3-2 (page 13) models 1,250 dwellings for HA55 and 213 dwellings for HA54. It identifies two junctions in the vicinity of the allocation at Bridge Street, Titchfield that meet the severe impact criteria for cumulative local plan development with delay increases of 60 and 65 seconds respectively. While it is not possible to attribute impacts to specific sites through a strategic model, their proximity is noted. However, in the case of these junctions, the Highway Authority has a deliberate policy of constraining capacity at this junction to deter rat-running through Titchfield and consequently a mitigation scheme is not required, set out in Table 1 (page 8) Updated Strategic Transport Assessment SRTM Junction Modelling Report.
- 41.4 Concerns raised from the neighbouring authority in relation to cumulative impact from these two sites (HA54 and HA55) on the wider network into and out of the peninsular are addressed in the updated SoCG with Gosport Borough Council (FBC039). Further explanation of the assessment and modelling inputs was provided to GBC and following consideration and agreement at the 9th February Economic Development Board (FBC040), the Council withdrew its objection to the Plan.

42. Should the site-specific requirements include cycle and walking connections from the site to local shops, the adjoining development (site ref HA55), and Fareham and Stubbington village?

- 42.1 The two sites of HA54 and HA55 are not considered by the Council to be adjoining. The construction of the new bypass and the retained gap between the settlements, a key policy feature of HA55 and feature of the HA55 Longfield Avenue Statement of Common Ground (FBC041 paragraphs 2.10 to 2.12) will ensure that the two developments are considered part of separate settlements. There will be no direct connections to the bypass for vehicular movements. The policy identifies a requirement in criterion g) to link footpaths within the site to the existing PRow route, which runs to the south of the development and connects with Stubbington village.
- 42.2 Strategic Policy TIN1 Sustainable Transport requires all development applications to contribute to the delivery of identified cycle, pedestrian and other non-road user routes. It is proposed that the main tool for achieving this will be the Local Cycling and Walking Infrastructure Plan upon its adoption by the Highway Authority. This will identify local key walking and cycling routes which the Highway Authority will seek contributions towards. Criterion iv. of Policy D1: High Quality Design and Placemaking also places a requirement on connections and movement with key services and facilities.