

**LOCAL PLAN PART 2: DEVELOPMENT SITES AND POLICIES.
SUPPLEMENTARY INFORMATION IN RESPONSE TO ISSUE 7:
HOUSING ALLOCATIONS INCLUDING ALTERNATIVE SITES FOR
CONSIDERATION (DSP40).**

Land West of Moraunt Drive, Portchester.

On behalf of

STONE FALCONER 

**STONE FALCONER LTD
RESPONDANT NUMBER: DREP395**

Alliance Planning

Wharf House, Wharf Road, Guildford GU1 4RP

 : 01483 579 098

 : support@alliance-plan.co.uk

October 2014

www.alliance-plan.co.uk

REF: 5373

**LOCAL PLAN PART 2: DEVELOPMENT SITES AND POLICIES – SUPPLEMENTARY
INFORMATION IN RESPONSE TO ISSUE 7: HOUSING ALLOCATIONS INCLUDING
ALTERNATIVE SITES FOR CONSIDERATION (DSP40).**

ON BEHALF OF: STONE FALCONER LTD

PREPARED BY:



S CRICKETT BA (Hons), MSc., MRTPI

REVIEWED BY:



J BAILEY BA (Hons), MRTPI

DATE:

OCTOBER 2014

CONTENTS

	Page
1.0 INTRODUCTION	2
2.0 DELIVERABILITY	3
3.0 CONCLUSION	11

Appendices

- 1 - Site Location Plan.
- 2 - Summary of Relevant Development Plan Policies.
- 3 - Preliminary Ecology Appraisal prepared by the Ecology Consultancy.
- 4 - Flood Risk Statement prepared by Stilwell Partnership.
- 5 - Transport Statement prepared by Stilwell Partnership.

1.0 INTRODUCTION

- 1.1 This document has been prepared and submitted on behalf of our client, Stone Falconer Ltd, in relation to the Independent Examination of the Fareham Local Plan Part 2: Development Sites and Policies. Specifically this statement and its appendices provide supplementary information to support the Inspector in the consideration of Question 7.5 of 'Issue 7: Housing Allocations including alternative sites for consideration (DSP40)' which will take place at the Examination Hearing to be held on Tuesday 18th November, re. is there any evidence to enable a conclusion to be drawn that the allocation of suggested site DREP395 (land west of Moraunt Drive, Portchester) would be sound. This document should accordingly be read in conjunction with the original representation submission made on behalf of Stone Falconer Ltd in April (Respondent Ref. DREP395).
- 1.2 The sole intent of this supplemental information is to provide the Inspector with further evidence to consider whether the allocation of the land west of Moraunt Drive, Portchester (DREP395) would be sound and in accordance with the advice and guidance of the National Planning Policy Framework (NPPF) and the local policy framework of the Fareham Local Plan Part 1.

2.0 DELIVERABILITY OF LAND WEST OF MORAUNT DRIVE, PORTCHESTER (DREP395) – THE CASE FOR ALLOCATION

2.1 As clearly stated in the original Local Plan Representation made on behalf of our client in April 2014, it is considered the land west of Moraunt Drive should be allocated within the Fareham Local Plan Part 2 as a site with the potential to deliver up to 200 dwellings during the plan period.

Introduction to the Site

2.2 The site is located to the south west of Portchester and comprises an area of undeveloped land of 8.37ha in total. A site location plan is included at Appendix 1. Presently, the site is occupied by a mix of grassland, scrub, woodland and abandoned, inaccessible, allotments.

2.3 For descriptive purposes the site can be split into two sub-areas, these being the eastern and western sections of the site. The eastern and western sections of the site are defined on the ground by the belt of broadleaved semi-natural woodland which dissects from north to south. The northern third of the eastern half comprises the abandoned allotments which are substantially overgrown and impenetrable from the point of access from within Seafield Road. The remaining extent of the land predominantly comprises scrub land with extensive sub areas of overgrown scrub vegetation. The northern and eastern boundaries of the eastern section of the site are bounded by the existing urban (residential) area of Portchester. The southern boundary is close to the coastal line.

2.4 The western half of the site comprises more open semi-improved grassland with only sporadic areas of dense scrub and small number groupings of trees. This land is currently used for horse grazing on a sporadic basis. The northern boundary of the western section bounds an extensive area of woodland, known locally as Wicor Copse. The southern boundary is also close to the coastal line. The western boundaries of the site adjoin a small pocket of woodland and the rear curtilage of the Wicor Marine Yacht Haven (WMYH).

2.5 With the exception of the south eastern corner of the site and at sporadic points along the southern boundary, the site benefits from mature landscape screening which limit views into the site from wider points of vantage.

2.6 There is a single formal long distance public footpath, the 'Wicor Way', which passes through the eastern section of the site, entering to the south of Moraunt Drives cul-de-sac end point. The path transects the site from east to west and exits the site to follow the line of the western sections northern site boundary.

The Wider Location - Summary

2.7 Beyond the immediate boundaries of the site the area contains large areas of existing residential development, areas of employment (commercial and industrial), sports and recreational land and some agricultural land.

2.8 Portchester itself is a sizeable settlement, with a wide range of facilities including a district centre, local doctors and dentists, primary schools and two secondary schools and a community centre. Portchester has a reasonable local employment base with Murrills Estate and the Castle Trading Estate. Portchester is located in very close proximity to the larger settlement of Fareham wherein there is greater access to employment, leisure and recreational opportunities.

Deliverability

2.9 Footnote 11 referred within Paragraph 47 of the NPPF sets out that to be considered deliverable, sites: should be available now; offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, development needs to be viable.

Planning Policy

- 2.10 The Development Plan comprises the policies and guidance of the NPPF, the ‘Saved’ policies of the Fareham Local Plan Review (FLPR) (adopted 2001) and the policies of the adopted Fareham Core Strategy (CS) (August 2011) – otherwise known as the Local Plan Part 1. Relevant Policies include.
- 2.11 A summary of the adopted development plan policies relevant to the deliverability of the site are included in Appendix 2.

Impact on landscape character and appearance

- 2.12 The site is located outside of the defined settlement policy boundary of Portchester. Part of the northern and eastern site boundaries do however immediately adjoin the settlement area. From the north the presence of the Wicor Copse woodland and the belt of tree planting along the south western and southern site boundary restricts wider views of the site from the sea. Views are however available from users walking the informal footpath that follows the route of the southern site boundary. The south eastern corner of the site is also visible when viewed from the small grassed area of open space which adjoins the site. The north eastern area of the site is well screened from wider public vantage owing to the presence of the existing residential development.
- 2.13 From users walking the formal Wicor Way footpath the development of the site would alter the present visual aesthetic and character of the site. It is not however considered that this would adversely detract from the landscape character. Indeed, it would be possible to improve the experience of the footpath from its present condition which is unmade land and lacking in surveillance of any kind. Moreover, the Wicor Way follows a formal hard surfaced path through the urban residential area to the east of the site. Development of the land at Moraunt Way would therefore read as a continuation of the path’s route through a residential environment albeit would continue to be bound by the Wicor Copse wood.

- 2.14 Within the wider coastal landscape context, the site presently reads as an undeveloped parcel set between the existing commercial boatyard and the existing residential area to the east. It is therefore considered development of the site would read as a logical infilling of the existing built area. Furthermore, the coast line in this location does not clearly exhibit any specific features of landscape importance or wider visual significance such that the introduction of built form would adversely detract from the coastal environs. As demonstrated by the submitted indicative layout, it would be possible to deliver a sizeable area of improved open space in the southern area of the site. This space, in combination with appropriate landscaping would therefore limit views of the built area of the site when viewed from the sea and the informal coastal path. It would also offer an opportunity to increase the use of the existing small parcel of open space which adjoins the south eastern corner of the site.
- 2.15 With regard to maintaining separation of the gap between the built up areas of Portchester and Fareham it is considered that development of the site would not undermine the existing substantive separation between the two settlements. The site does not extend beyond the existing southern edge of the urban area and would result in the rounding-off of the urban land parcel. The site also comprises a very small area of the wider gap between Fareham and Portchester (present on either side of the A3 beyond the linking ribbon of development) such that its loss in statistical terms would be of no material consequence.
- 2.16 With the above in mind it is considered development of the site could be achieved in accordance with the guidance of Paragraphs 52, 109 and 114 of the NPPF and Policy CS14 of the Core Strategy.

Loss of Open Space

- 2.17 Core Strategy Policy CS21 seeks to safeguard against the loss of existing open spaces. It does however acknowledge that this may be permissible where open spaces are of poor quality, under-used or have low potential for open space and better quality replacement space is provided. Although not allocated as open space on the Proposals Map of the FBLP within the Local Plan Part 2 it is proposed to allocate the site as Existing Open Space. In this context it is

considered the redevelopment of the site would represent development of poor quality and under-used open space. At present the majority of the land is occupied by coarse scrub land which in locations is impenetrable. The remaining open land is not available for public use and it too has pockets of dense scrub land surrounded by land used on occasion for the grazing of horses.

- 2.18 It is also of note that within the immediate vicinity of the site, to the west, there is a sizeable area of publicly accessible open space which provides multiple full-size football pitches, a communal sports hall facility building and ample car parking provision. The Council's own assessment of the available open space within Portchester highlights a surplus of existing provision. It is therefore considered that the principle of the loss of open space does not inhibit the development potential of the site. Notwithstanding, as shown on the indicative site layout, development of the site would also be capable of delivering an improved area of open space, which as shown would be approximately 2.9ha, capable of serving the needs of the occupiers of the new dwellings and those of the immediately surrounding properties. This would also be in excess of the Core Strategy's minimum standard. It is not therefore considered the loss of part of the current poor quality open space, would be in conflict with the objective of Policy CS21; rather it offers the opportunity to create an amenity of considerable value such that it would accord with Policy CS21.

Ecology

- 2.19 The PEA undertaken by The Ecology Consultancy (full copy enclosed at Appendix 2) identifies the habitats and the potential species, including possible protected species, present on the site. The preliminary recommendations of the PEA comprise the need for the following further surveys: wintering birds (Solent Waders and Brent Goose), breeding birds, reptiles, bats, badgers and hazel dormouse. The PEA also understandably recommends development of the site would require a dedicated site wide mitigation strategy for habitats and protected species. The opportunities to compensate reduction and enhancement of the biodiversity value of the site is also by reference to the potential for inclusion of SUDs, green roofs, rain gardens and wildlife friendly fencing, etc.

- 2.20 It is noted within the emerging Local Plan Part 2 that parts of the site are identified as being ‘uncertain Brent Geese and Wader Sites’ wherein the new policy would allow for development when studies demonstrate a site is not of importance. Accordingly, further surveys are already due to be undertaken in the coming months to determine the site’s potential.
- 2.21 At this stage therefore, the ecological conditions of the site does not represent an absolute barrier to delivery of up to 200 dwellings.

Transport and Sustainability

- 2.22 The Transport Statement prepared by the Stilwell Partnership (full copy enclosed as Appendix 3) identifies the site is surrounded by a large number of amenities with Portchester town centre located just 1.6km away and Fareham town centre 4km away. There are also retail, doctors, dentists, employment, education (nursery and reception years up to sixth form and further education), and a number of sports and recreational facilities within close proximity of the site.
- 2.23 There are existing bus routes serving the site, with the closest existing bus stop located within 500m of the site. Portchester railway station is located within 1.6km. The site also benefits from good access by means of road, cycle and foot.
- 2.24 It is considered two new access points would be appropriate to serve the site. One to be created by the extension of Moraunt Drive entering the site from the east; the second by improving the existing access serving the Wicor Marine Yacht Haven entering the site from the west.
- 2.25 The undertaken traffic survey and subsequent existing traffic modelling has demonstrated all the assessed junctions within the vicinity of the site would continue, including the traffic generated by the development of up to 200 dwellings, continue to work well during peak hours.

2.26 The TS's overall conclusion is that the site is situated within a sustainable location and is capable of accommodating the development of 200 dwellings without detriment to road safety or capacity on the surrounding highway network.

Flood Risk

2.27 The FRA prepared by the Stilwell Partnership (full copy enclosed as Appendix 4) identifies the larger area of the site lies within Flood Zone 1 and parts of the southern area lie within Flood Zones 2 and 3.

2.28 The primary source of flood risk affecting the southern area of the site has been established to be tidal water breaking the coastal boundary. All other flood risk sources have been determined to represent minimal risk. Following discussions with the EA it has been advised that appropriate mitigation in response to the tidal water risk would be to ensure all future dwellings on the site would have finished floor levels of no lower than 4.60m AOD.

2.29 The FRA confirms that development of the site for up to 200 dwellings could be appropriately achieved and sustainable in the terms set out by the NPPF.

SPA Mitigation

2.30 The site falls within 5km of the Portsmouth Harbour SPA. Accordingly, in order to prevent any adverse effects upon the SPA from the development of the site it may be appropriate to provide mitigation toward the provision of alternative recreational space for access management within and around the SPA site(s), by way of developer contributions.

2.31 In the event mitigation is required this would clearly fall to be secured at the time of securing a planning permission(s) to develop the site. As such, it is not considered this would preclude the deliverability of the site and development would be achievable in accordance with Paragraph 109 of the NPPF and Core Strategy Policy CS4.

Summary Conclusion

2.32 In summary, site DREP395 should be allocated for residential development, within the 1-5 year period for the following reasons:

- The site is in a sustainable location.
- Development would not adversely harm the coastal and wider landscape character and visual amenity of the area.
- With appropriate ecological mitigation and management development of the site would not have significant detriment in ecological terms.
- With appropriate mitigation development of the site would not result in increased vulnerability to the risk of flooding.

3.0 CONCLUSION

- 3.1 As stated in our original representations submitted in April 2014, we consider paragraphs 5.172 to 5.187 need to be reviewed to reflect Government Policy with regard to meeting the “full, objectively assessed need” for market and affordable housing in Fareham. It is considered both Table 4: Housing Delivery Overview (2006 – 2026) and Appendix C should be amended as per the recommendations provided in our original representations made in April 2014.
- 3.2 As currently drafted the Local Plan Part 2 is unsound and unlawful, because: it is not based on a strategy which seeks to meet the objectively assessed development requirements; as written, is not the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence; and, it is not considered to comply with the guidance of the NPPF or the NPPG. The Plan therefore fails 3 of the 4 tests of soundness in that it is not **positively prepared, justified or consistent with national policy**.

APPENDIX 1



APPENDIX 2

A2.1 The following provide a summary of the relevant policies of the adopted Development Plan, wherein the appropriateness of allocating site DREP395 falls to be considered:

NPPF

A2.2 Paragraph 17 of the NPPF sets out 12 core planning principles which should underpin plan-making. These include proactively driving and supporting sustainable development to deliver homes; actively encourage growth patterns to make the fullest possible use of public transport, walking and cycling; and focus significant development in locations which are or can be made sustainable.

A2.3 Paragraph 47 confirms local planning authorities should significantly boost the supply of housing, using their evidence base to ensure their Local Plan meets the full objectively assessed market and affordable needs; and, identify a supply of specific deliverable and developable sites.

A2.4 Paragraph 52 states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns.

A2.5 Paragraph 99 sets out that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, including factors such as flood risk. When new development is brought forward in vulnerable areas care should be taken to ensure the risks can be managed through suitable adaptation measures.

A2.6 With regard to the natural environment, Paragraph 109 refers that planning should protect and enhance valued landscapes. Paragraph 114 also refers that local planning authorities should maintain the character of undeveloped coast, protecting and enhancing its distinctive landscapes.

Core Strategy

- A2.7 Core Strategy Policy CS14 (Development Outside Settlements) states that built development outside of the defined settlements (wherein the site is presently situated) will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function. It further states that on coastal locations development should not have an adverse impact on the special character when viewed from land or water.
- A2.8 Saved FBLP Policy C17 (Sites of Nature Conservation Value) refers that development of non-designated sites of nature conservation will not be permitted unless appropriate provision is made to offset adverse impact. Saved FBLP Policy C18 (Protected Species) states that development which adversely affects protected species or their habitats will not be permitted unless measures to prevent harm are undertaken. Policy CS4 of the Core Strategy further sets out a 5 tier hierarchy for the protection of nature conservation designations ranging from Sites of Nature Conservation Value through to International sites, such as SPAs, SACs, etc. The policy further sets out that in order to prevent adverse impacts upon sensitive European sites the Council will work to develop and implement a strategic approach to protecting such sites. This including a suite of mitigation measures, with adequate provision of alternative recreational space for access management, etc.
- A2.9 Core Strategy Policy CS15 (Sustainable Development and Climate Change) states the Council will promote and secure sustainable development by directing development to locations with sustainable transport options, access to local services, etc.
- A2.10 CS Policy CS21 (Protection and Provision of Open Space) seeks to safeguard and enhance existing open spaces and established networks of Green Infrastructure to add value to their wildlife and recreational functions. The Policy states that the loss of public and private playing fields, allotments and informal open space will not be permitted, unless it is of poor quality, under-used, or has low potential for open space and a better quality of replacement

site is provided. The supporting text to this policy (paragraph 6.43) clearly states that as of 2010 the Council had identified that within Portchester there was a surplus of open space provision with 8.5ha of natural green space and 5.7ha of parks and amenity space.

APPENDIX 3

APPENDIX 4

APPENDIX 5