



Linden Homes (South)

Land at Pinks Hill, Wallington

Representations on Draft Fareham Local Plan 2036

December 2017

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1.0 Introduction

- 1.1 This representation has been prepared by WYG on behalf of Linden Homes (South) who control land at Pinks Hill, Wallington (draft allocation HA8) and focus on those parts of the draft Local Plan that are of particular relevance to our client's interests in that regard.
- 1.2 Linden Homes welcome the inclusion of land at Pinks Hill in the draft Local Plan, and support the principle of the allocation but wish to raise a number of concerns about the details of the allocation.

2.0 Policy DA1: Development Allocations

- 2.1 Policy DA1 allocates Land at Pinks Hill, Wallington for mixed use (residential and employment) development with an indicative capacity of 80 dwellings and small scale employment units up to 1,000sq.m in total.
- 2.2 Linden Homes support the principle of the allocation but wish to raise a number of concerns about the details of the allocation as set out further below.

Contribution towards Housing Supply

- 2.3 Government policy in the form of the National Planning Policy Framework requires local planning authorities to *'boost significantly the supply of housing'* (paragraph 47, NPPF). National Planning Policy Guidance also advises that local planning authorities *'should aim to deal with any under-supply within the first 5 years of the plan period where possible'* (paragraph 035 Reference ID: 3-035-20140306, NPPG).
- 2.4 The commitment to boost housing supply has recently been reinforced as part of the Government's Budget announcement in November 2017 where the Chancellor of the Exchequer confirmed that housebuilding is the *"number one priority"* in the Budget and set a target of delivering 300,000 homes per year.
- 2.5 In line with national policy, Linden Homes' site at Pinks Hill can deliver a material amount of housing in the short term and with capacity to accommodate more housing than currently identified by Policy HA8. Work is underway to inform a planning application with the intention to make a formal submission to FBC in 2018 and the current assessments indicate that there are no site constraints that would prevent it being delivered quickly. It is anticipated that the site could begin delivery in the year 2019/20 for completion by the year 2022/23
- 2.9 The site can therefore deliver housing within the next five years to address the past under-supply in a timely manner in accordance with Government policy.

Site Allocation HA8

Site Allocation Plan

- 2.10 The red line delineating the allocation on page 151 measures 5.3 hectares and includes land under the control of Linden Homes and Fareham Borough Council. An indicative masterplan framework is included at Appendix F of the Local Plan (page 230) illustrating how the site could notionally be developed. This shows approximately 0.5 hectares given over to employment with the remaining 4.8 hectares given over to residential use and landscaping. The illustrative masterplan shows a net developable area of approximately 3.5 hectares (excluding the areas of public open space, play space and landscaping).

Allocation Requirements

- 2.11 Requirement (a) sets out that *'the quantum of housing proposed shall be broadly consistent with the indicative site capacity'*. Linden Homes welcome the flexibility included in the policy, allowing broad consistency with the indicative site capacity, however the proposed provision of 80 dwellings over the net developable area (3.5 hectares) would equate to a development density of just 23 dwellings per hectare, which is universally accepted as a low density. If applied too rigidly, this would not represent an efficient use of land. Local Plans should be a positive exercise in planning for the future needs of an area and for this reason, it is important that no ceiling or other barriers are placed on housing delivery. Accordingly, if the Council is minded to maintain this indicative capacity it should be regarded as a minimum for the site.
- 2.12 The Draft Local Plan establishes an indicative housing mix at paragraph 5.25, which includes 99% of dwellings to be provided as 3-bedrooms or less. It is considered that the proposed density for Pinks Hill is unrealistically low for the type of development required in the Borough and a more appropriate density should be applied. Over the same developable area, a development density of 3.75dph would equate to provision of approximately 130 dwellings which is considered to represent a more efficient use of the land to help to significantly boost the supply of housing in accordance with National Planning Policy.
- 2.13 It is noted that the draft development frameworks prepared for other sites in the Borough have included density assumptions that offer greater flexibility. For example, Appendix C relating to the land at Greenaway Lane, Warsash identifies a variable density of between 15dph and 35dph for the site. Whilst the wording of Policy HA8 allows broad consistency with the indicative site capacity, the starting point for the allocation is too low if it is applied too rigidly. Accordingly, the indicative

capacity for the site should be increased to a more reasonable level so as not to artificially constrain its development potential. Further consideration of what Linden Homes consider to be a reasonable capacity for the site is set out further below having regard to the other requirements of the draft allocation.

- 2.14 Requirement (c) seeks to limit development to a maximum of 3 storeys on site, except for buildings fronting onto Pinks Hill and Military Road where building heights will be limited to a maximum of 2 storeys. Linden Homes are broadly supportive of this approach however, the current wording of the policy is too restrictive and it is considered that greater flexibility could be built into the policy in order not to curtail the development opportunities of the site. In this regard, the policy should be amended to read: *The height of buildings shall be generally limited to a maximum of 3 storeys, except for buildings which front onto Pinks Hill and Military Road where building heights will be generally limited to a maximum of 2 storeys;*
- 2.15 Requirement (d) sets out that the development of Pinks Hill shall make '*provision of safe pedestrian and cycle crossing points across Pinks Hill and along Military Road to provide the site with links to both Wallington and the surrounding area, in order to link the site with local schools and existing services*'. Linden Homes do not dispute the requirement to deliver these connections however the policy should be less prescriptive and more flexible in how these connections are delivered. In this regard, it is considered that requirement (d) of draft allocation HA8 should be amended to read '*the provision of safe pedestrian and cycle links to Wallington and the surrounding area, in order to link the site with local schools and existing services*'. This is considered to provide greater flexibility on how the site could be delivered.
- 2.16 Requirement (f) identifies a need for the '*provision of a suitable and robust visual and acoustic buffer between the site and the waste transfer station logistics depot immediately north of the site (as illustratively shown in Appendix F). Active uses within the buffer such as the provision of small scale employment units (up to 1000 sq.m in total) will be supported provided they:*
- *are screened by tree belts; and*
 - *are served by a separate access road from Military Road; and*
 - *provide an effective visual and acoustic barrier from traffic movements.*
- 2.17 WYG on behalf of Linden Homes were instructed to undertake further work to understand the noise environment of the site. This work included baseline assessments to determine background levels from neighbouring noise sources, including the A27, M27 and existing industrial development within

the vicinity of the Pinks Hill Site (including the waste transfer station to the north). Existing ambient noise levels around the site were recorded as being dominated by road traffic noise from the A27, the M27, and Wallington Way.

- 2.18 The purpose of this noise modelling work was to ascertain the level of mitigation required and to inform the design and layout of potential future residential development. The modelled illustrative concept layout is attached at Appendix A. This background modelling formed part of the site promotion submitted to FBC ahead of the publication of the draft Local Plan and this is included at Appendix B of this representation. The conclusion of the noise modelling is that the site can accommodate residential development, with acceptable internal and external noise environments across the entire site during the day and night time periods, subject to the inclusion of modest noise mitigation to the site boundaries and through the careful orientation of buildings, rear garden areas and site layout.
- 2.19 Based upon this noise modelling it is considered that draft policy requirement (f) is not necessary in order to secure an appropriate living environment for future occupiers of the site. Accordingly, the entire site could come forward for residential development, with ample opportunities to provide a visual or landscaped buffer to the industrial land uses to the north. In addition, the proposed employment element of the draft allocation would only make limited contribution to employment provision within the Borough and could be readily provided elsewhere within the Borough, either in existing employment allocations and industrial estates or in more appropriate green or brownfield locations. Based upon the density calculations set out above, assuming the employment land is given over to residential use, then it is estimated that the site could in fact accommodate up to 150 dwellings.

Appendix F: Development Allocation HA8 (Pinks Hill, Wallington) – Illustrative Framework

- 2.20 With the exception of the proposed employment element of the draft allocation, which we contend is not necessary to provide a buffer to the waste transfer station to the north, Linden Homes are broadly content with the parameters established by the Illustrative Framework. However, it is considered that the Development Framework adds little to the draft site allocation and should be removed. If the framework plan is to remain part of the Development Plan it should only be regarded as illustrative and should not be used to direct the development of the site, particularly if the detailed technical and environmental assessments accompanying a future planning application confirm that a better alternative approach exists.

Summary

- 2.21 In summary Linden Homes support the principle of allocation HA8 but wish to raise a number of concerns about the details of the allocation. In particular the capacity of the site assumed by Fareham Borough Council is artificially low and does not make best use of the site. It is also considered that the employment element of the application is superfluous because noise modelling demonstrates that an acceptable living environment for residential users can be created without it. Therefore, it is considered that the site has a greater capacity than indicated by the draft Local Plan and it is suggested that the indicative capacity of the site be upwardly revised to 150 dwellings, with the wording of requirement (a) maintained to provide flexibility. Without prejudice to our case above, if the Council are minded to retain the employment element of the site allocation then the indicative capacity should be upwardly revised to 130 dwellings. In addition to this amendment and as set out above, greater flexibility should be incorporated throughout the draft allocation to make sure that no artificial constraints are placed on the site. This will ensure the development can respond appropriately to the development needs of the Borough and the opportunities and constraints of the site, informed by the requisite technical and environmental assessments.

3.0 Policy H2: Provision of Affordable Housing

- 3.1 Paragraph 173 of the National Planning Policy Framework (NPPF) sets out that plans should not set out obligations that would threaten the viability of the sites and scale of development that is being proposed in the plan.
- 3.2 Policy H2 is aligned with national policy as set out within the written ministerial statement of 28th November 2014 and paragraph 31 of Planning Practice Guidance (ref: 23b-031-20161116), in that affordable housing are only sought on development of 11 units or more. The justification behind the national policy is clear, it seeks to ease the disproportionate burden of developer contributions on small scale developers, thereby encouraging more small and medium scale house builders to improve competition and variety. The acknowledgement of this national policy requirement in policy H2 is supported by Linden Homes.
- 3.3 In addition, the requirement for 30% affordable housing provision as set out within Policy H2 is well evidenced by the Local Plan Viability Assessment which is considered robust. The acknowledgement of viability within policy H2 is welcomed and enables the policy to be operated with a suitable degree of flexibility where the need for that is robustly justified.
- 3.4 However, policy requirement a) which necessitates the provision of 10% of the overall dwellings on site as affordable home ownership products is somewhat ambiguous. The supporting text to the policy at paragraph 5.19 seems to suggest that this 10% provision is for starter homes and it is not clear from the current wording of the policy how this requirement affects the provision of other more traditional affordable tenures including shared ownership. Paragraph 5.18 identifies a notional 65:35 affordable rent to affordable home ownership products which identified through the PUSH SHMA, but which appears to exclude starter home provision. Linden Homes supports the inclusion of starter homes within the definition of affordable housing under Policy H2 but requires greater clarity on the split of tenures sought by the Policy.
- 3.5 Policy H2 is consistent with national policy, it is well evidenced and provides a suitable degree of flexibility and it is therefore considered generally sound, subject to greater clarity on the housing tenure requirements.

4.0 Policy H4: Adaptable and Accessible Housing

- 4.1 The requirements of Policy H4 appear to be reasonable, however Linden Homes agree with paragraph 5.39 that the viability implications of the category 3 optional standard for wheelchair accessible homes should be fully tested in advance of the plan being adopted. This is because the cost implications of this standard may have implications on the viability of development proposals and therefore the ability to deliver necessary affordable homes and infrastructure requirements. In order to provide flexibility, a balance between scheme viability, affordable housing and infrastructure delivery is considered necessary. Accordingly, it is suggested that this policy should be amended such that its requirements could be set aside or reduced on the grounds of viability.

5.0 Policy H7: Self and Custom Build Homes

- 5.1 Custom build and self-build development is an important part of the Governments agenda to widen the choice of homes and encourage greater variety by supporting small and medium size housebuilders. The need for self and custom build plots is recorded through registers kept by Councils and a duty has been placed on LPAs to grant planning permission to satisfy this need in full. The need identified on FBC's register does not appear to have been factored into the Objectively Assessed Housing Need (OAHN) reported in the GL Hearn April 2016 update report. Whilst there may be some overlap between the need identified on the register and the OAHN, based upon the evidence provided in support of the draft local plan, and for the avoidance of doubt, the assumption should be that the need for self/custom build is distinct from the OAHN as a specialist form of housing.
- 5.2 On this basis, policy H7 is therefore flawed. By requiring 5% of plots to be provided on all sites over 100 units as self/custom build this may have the implication of diminishing the contribution of such sites towards satisfying the full OAHN. There is also the risk that policy H7 could leave a significant number of self-build plots empty if the demand for such develop does not exist or if those on the register do not have the ability to build their own homes. There is currently no mechanism in the policy for these plots to revert to the developer and as such the policy is ineffective. We are also concerned about how the plots would be delivered on large housing developments in a way that conforms sufficiently with site health and safety requirements.
- 5.3 The report prepared by Adams Hendry in January 2017 considering self and custom build housing need in Fareham identifies a need for 20 plots at a specific point in time. However, this is demonstrably out of date with Fareham Borough Council's self-build register currently identifying a total need for 97 plots. The evidence base supporting the local plan is therefore out-of-date and does not accurately reflect the total need for self/custom building housing land.
- 5.4 The requirements of Policy H7 are therefore arbitrary, and are not properly evidenced. It is considered that the policy is too blunt and may negatively impact the ability of Fareham Borough Council to meet its objectively assessed needs. Paragraph 14 of the National Planning Policy Framework (NPPF) requires Local Plans to be flexible and able to adapt to rapid change. Self/custom building housing is a dynamic housing need that can vary considerably year-on-year and therefore a more dynamic policy is required that enables the requisite amount of self/custom

building development land to come forward without prejudicing the Council's ability to meeting its OAHN.

- 5.5 It is not clear whether the Council have considered alternative approaches to the delivery of self-build plots. It is important that the Council examines all options in line with PPG before placing additional burdens on the development industry, which may have the unintended consequence of prejudicing the Council's ability to meet its full OAHN. The PPG also sets out in paragraph 57-025 that the Council should seek to encourage landowners to consider the provision of self-build plots and facilitate access where they are interested. The approach taken by the Council clearly goes beyond encouragement as it requires the provision of plots.
- 5.6 If the Council consider that a quota based policy is the preferred approach to satisfying the self/custom build need in Fareham, and provided that it can be demonstrated that this would not affect the Council's ability to satisfy its OAHN in full, then a more flexible approach should be adopted. For example, the proportion of plots being brought forward as self-build should only reflect the need demonstrated on the register. This should also factor in locational choice as clearly demand exhibited in one part of the Borough is specific to that location and it would be unreasonable to expect those on the register to satisfy their need elsewhere. If a specific quota is applied then this should be regarded as a starting point for negotiations and with the relevant caveat that such a requirement could be set aside or reduced on the grounds of viability.
- 5.7 In the case of Pinks Hill, local demand for self build development is likely to be absorbed by the site immediately adjacent (policy HA16), which is proposed to be allocated for an entirely self-build scheme of up to 26 dwellings. However, based on the current requirements of Policy H7, the revised allocation for Pinks Hill discussed at Section 2 above would be required to provide 5% self-build properties, which may result in provision of circa 33 self-build plots in the Wallington area. There is a very real risk that these plots could be left empty if the demand for such develop does not exist. This is a good example of why draft Policy H7 is too blunt and needs to be made more flexible and dynamic, responding to the actual demand for self-build plots as identified on the register.



Appendix A – Conceptual Layout (Illustrative)



Pinks Hill, Fareham
CONCEPTUAL LAYOUT
DWG N°: Conceptual Layout 001b

Drawn: MA
Checked: JG
Scale: 1:1000 @ A2
Date: 15.09.2017

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Appendix B - Noise Modelling

Land at Pinks Hill, Fareham: Residential Constraints Sketches – Noise

Mixed use development comprising of 50+ residential properties.

A monitoring survey was undertaken between Tuesday 27th April and Thursday 4th May 2017 to characterise baseline ambient noise levels currently experienced on the site and to establish the relative local background and traffic noise levels.

Existing ambient noise levels around the site are dominated by road traffic noise from the A27 to the south of the site, the M27 to the east of the Site, and Wallington Way to the west of the site. During the measurement survey, no noise from industrial activity was noted from the area to the north of the Pinks Hill site. As with the rest of the area noise levels within this part of the site were dominated by road traffic noise from the adjacent local road network.

Using the monitoring data, a 3D noise model was built and verified to determine the noise levels across the existing site. The results of which were used to indicate the likely noise levels received at the locations of the proposed residential properties. Sketches showing the outputs of these assessments are appended to this document.

Constraint Model Outputs

The information below describes in text the noise contour sketches produced.

SK04 shows the daytime noise contours across the existing site, as can be seen from this sketch the noise levels are in excess of 65 dB(A) across the proposed site.

SK05 shows the same site but with additional mitigation from a 2.0m landscape bund and 2.0m barrier positioned along the length of the southern boundary. Visually noise contours are seen to reduce to below 65 dB(A) across the site.

The above sketches do not show an indicative layout of the housing and so other than what is proposed there is little other screening for noise.

SK01 shows the daytime $L_{Aeq, 16hour}$ noise contours with mitigation including the screening effects of an indicative housing layout. The majority of areas across the site fall below within the 0 - 55 dB(A) band.

Similarly, SK02 shows the night-time $L_{Aeq, 8hour}$ noise contours with mitigation including the screening effects of an indicative housing layout. The majority of areas across the site fall below within the 0 - 55 dB(A) band.

For completeness, SK03 represent night-time L_{Amax} noise levels with an indicative housing layout with mitigation. In the context of this site, the L_{Amax} noise levels are representative of sudden noise levels such as

passing motorbikes, car horns or emergency sirens. The levels indicated are not unexpected for a site in this location and with appropriate mitigation are not necessarily prohibitive for a residential development.

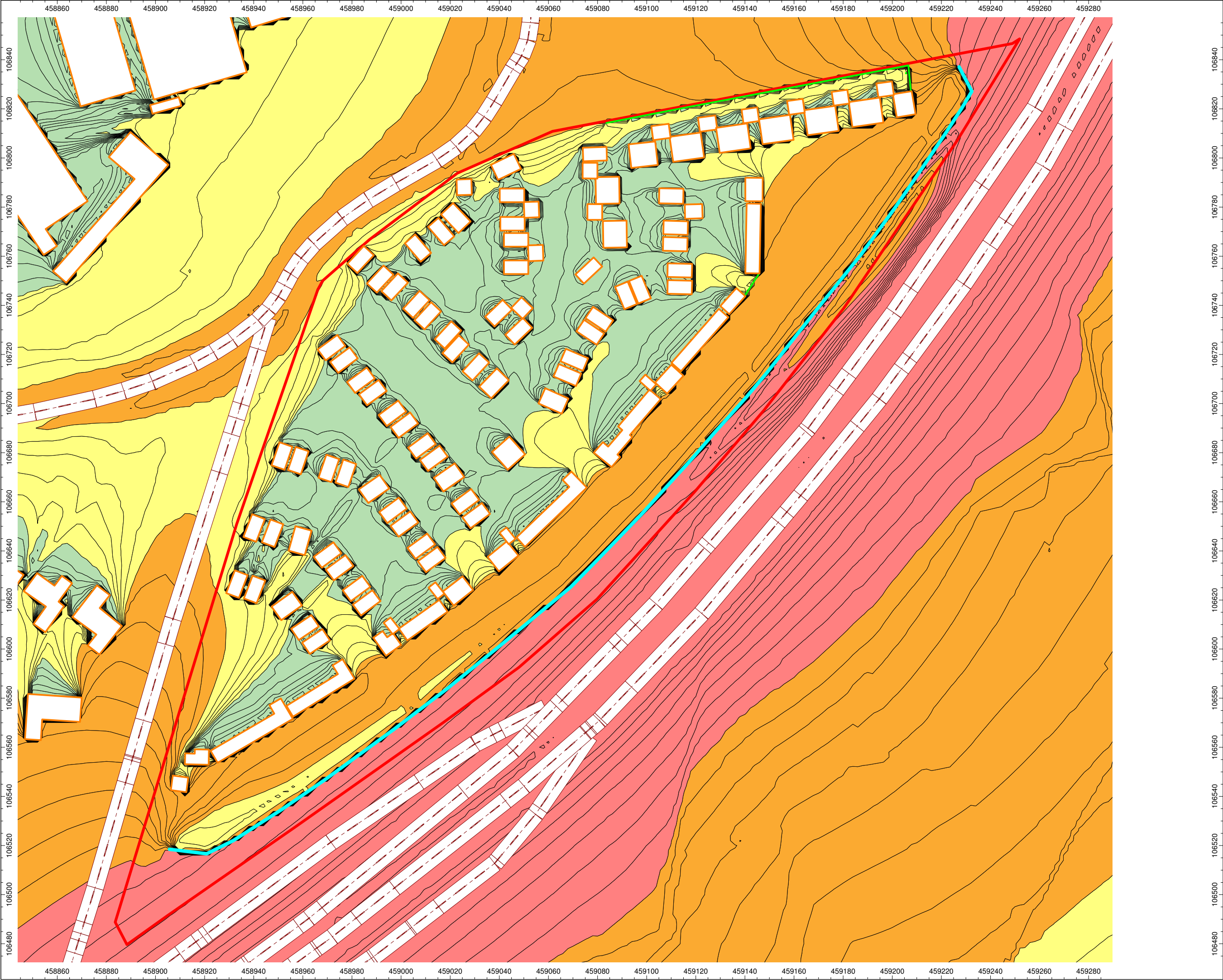
Effects on the Development

Below 65 dB(A), internal noise levels for sensitive rooms within the proposed residential properties can be mitigated through the use of enhanced glazing and alternative ventilation.

BS8233 also requires the assessment of daytime noise levels in external amenity areas, although this is assessed in more detail in the report, the constraints sketches allow for quick review of the noise level and so indicative of areas likely to meet this criteria. For reference the reasonable criteria for external amenity areas is below 55dB(A), ideally below 50dB(A) is the preference.

Both SK01 and SK02 have areas where the noise levels are below 50dB(A), it is considered that suitable areas for external amenity could be expanded through the positioning of the buildings to provided screening for the gardens positioned at the rear of the property away from the sources of noise.

Based on the survey that was undertaken, it is considered that with the use of appropriate mitigation as described within this constraints report the noise levels on the proposed development site are not prohibitive for the development of residential properties.



Project:
Pinks Hill, Fareham

Project Number:
A103358

Drawing Title / Scenario:
Proposed Daytime
Noise Levels LAeq,16hour
With Mitigation

Drawing Number:
SK01

Key:

Site Boundary: —

2m Barrier & 2m Bund: —

Barriers: —

0.0 - 55.0 dB
55.0 - 60.0 dB
60.0 - 70.0 dB
>70.0 dB

Scale : Not to scale

WYGE Leicester 08.12.17

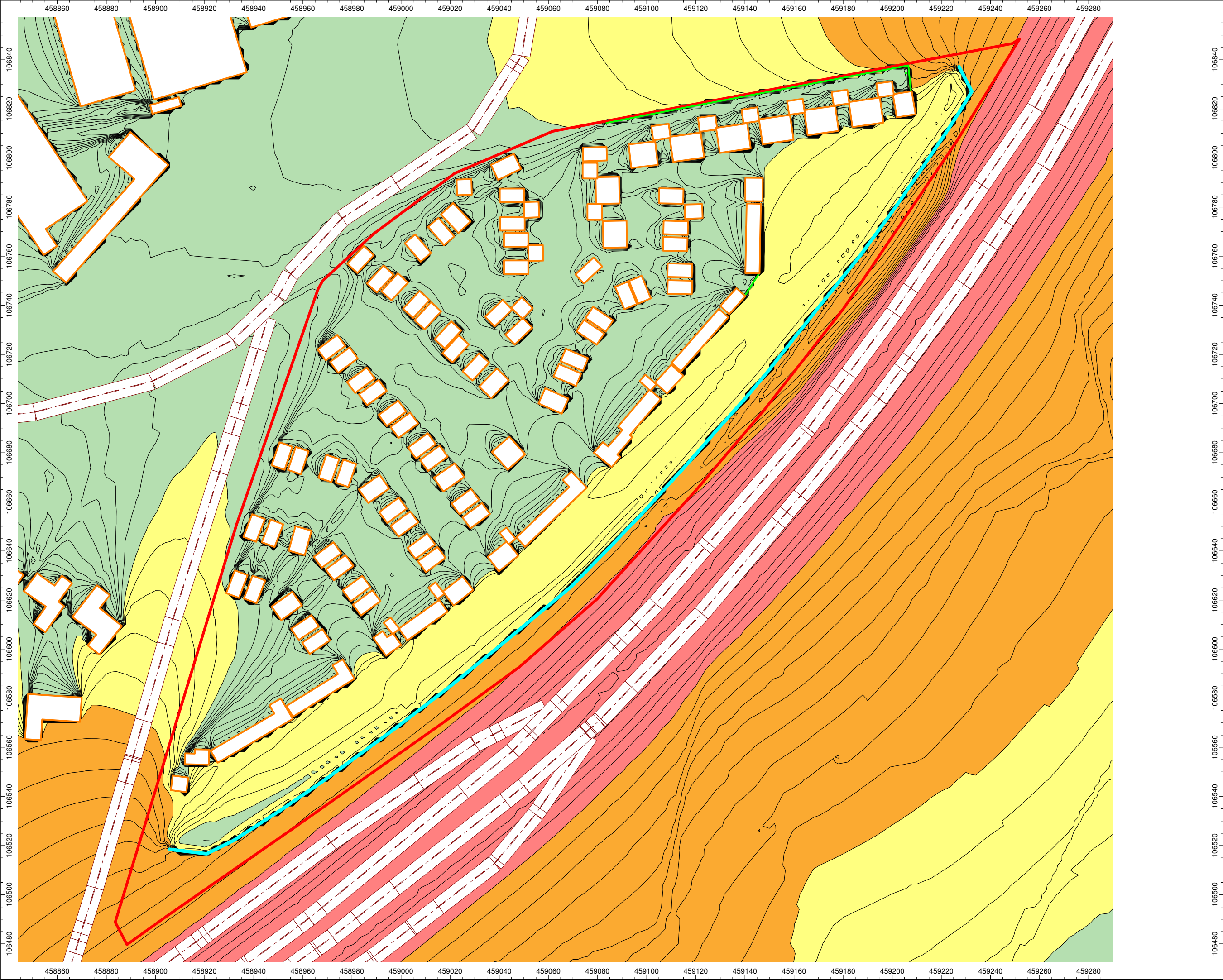
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Project:
Pinks Hill, Fareham

Project Number:
A103358

Drawing Title / Scenario:
Proposed Night-time
Noise Levels LAeq,8hour
With Mitigation

Drawing Number:
SK02

Key:

Site Boundary: —

2m Barrier & 2m Bund: —

Barriers: —

0.0 - 55.0 dB
55.0 - 60.0 dB
60.0 - 70.0 dB
>70.0 dB

Scale : Not to scale

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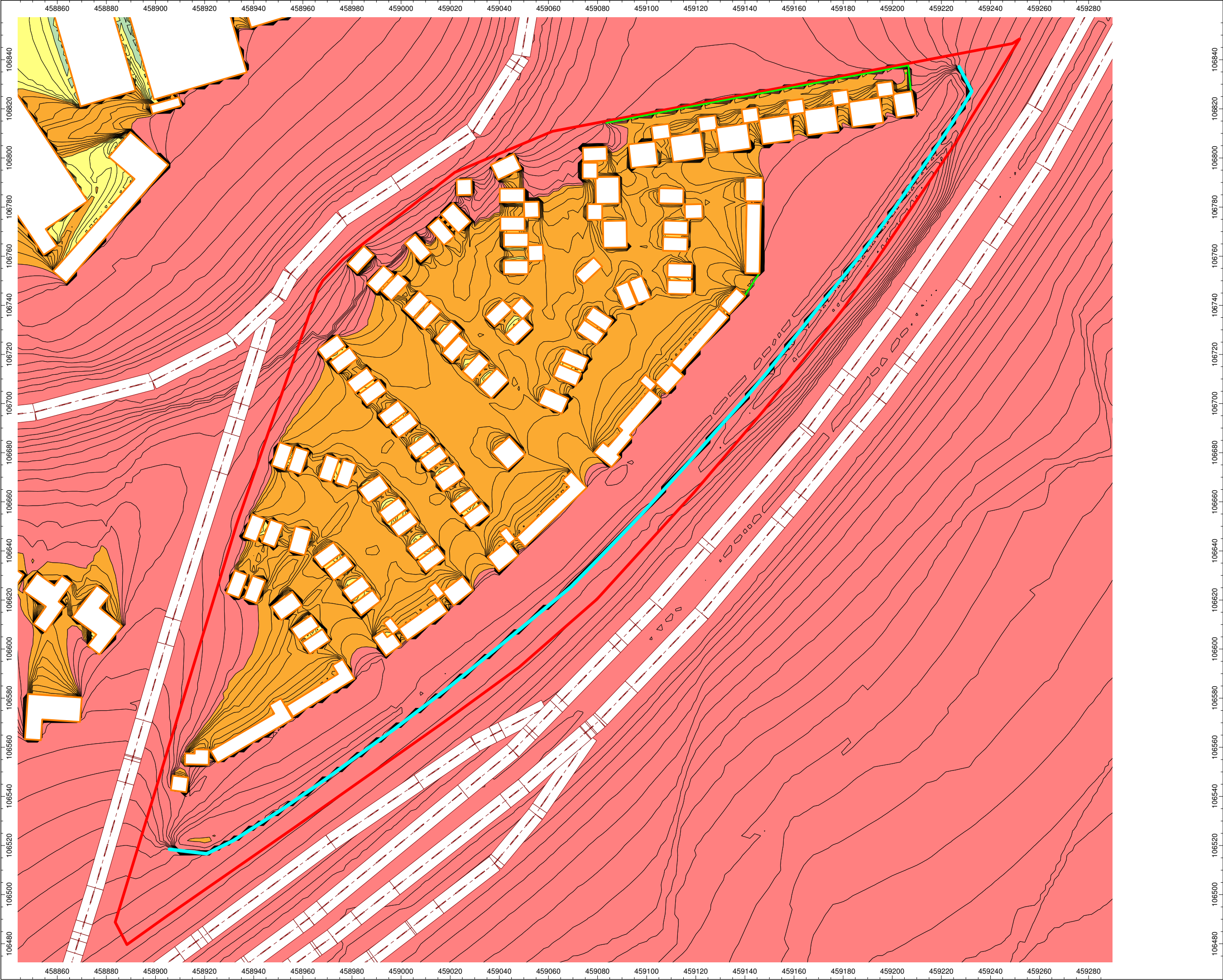
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Project:
Pinks Hill, Fareham

Project Number:
A103358

Drawing Title / Scenario:
Proposed Night-time LMax
Noise Levels
With Mitigation

Drawing Number:
SK03

Key:

Site Boundary: —

2m Barrier & 2m Bund: —

Barriers: —

0.0 - 55.0 dB
55.0 - 60.0 dB
60.0 - 70.0 dB
>70.0 dB

Scale : Not to scale

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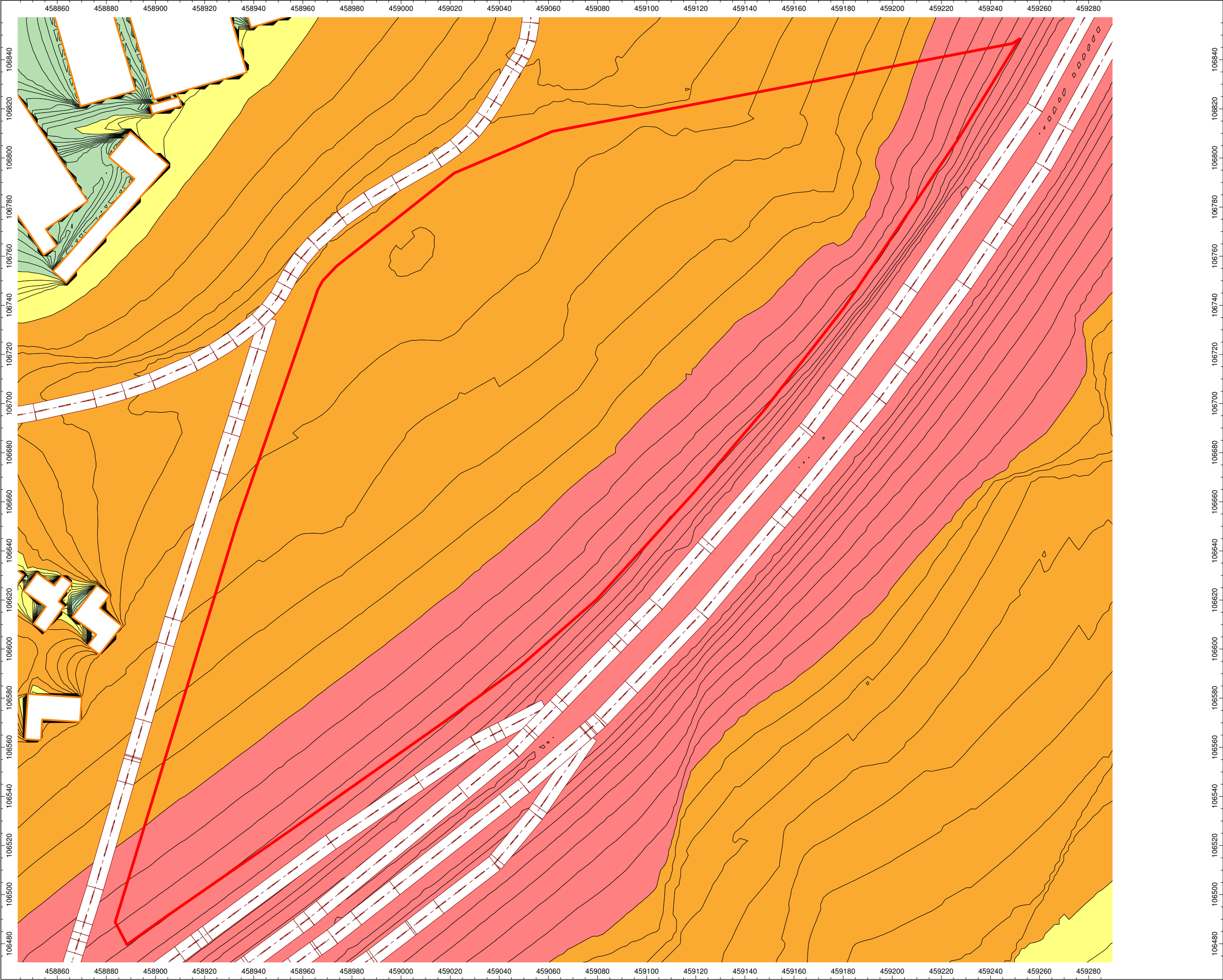
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Project:
Pinks Hill, Fareham

Project Number:
A103358

Drawing Title / Scenario:
Existing Daytime
LAeq16hour
Noise Levels

Drawing Number:
SK04

Key:
Site Boundary: —

0.0 - 55.0 dB
55.0 - 60.0 dB
60.0 - 70.0 dB
>70.0 dB

Scale : Not to scale

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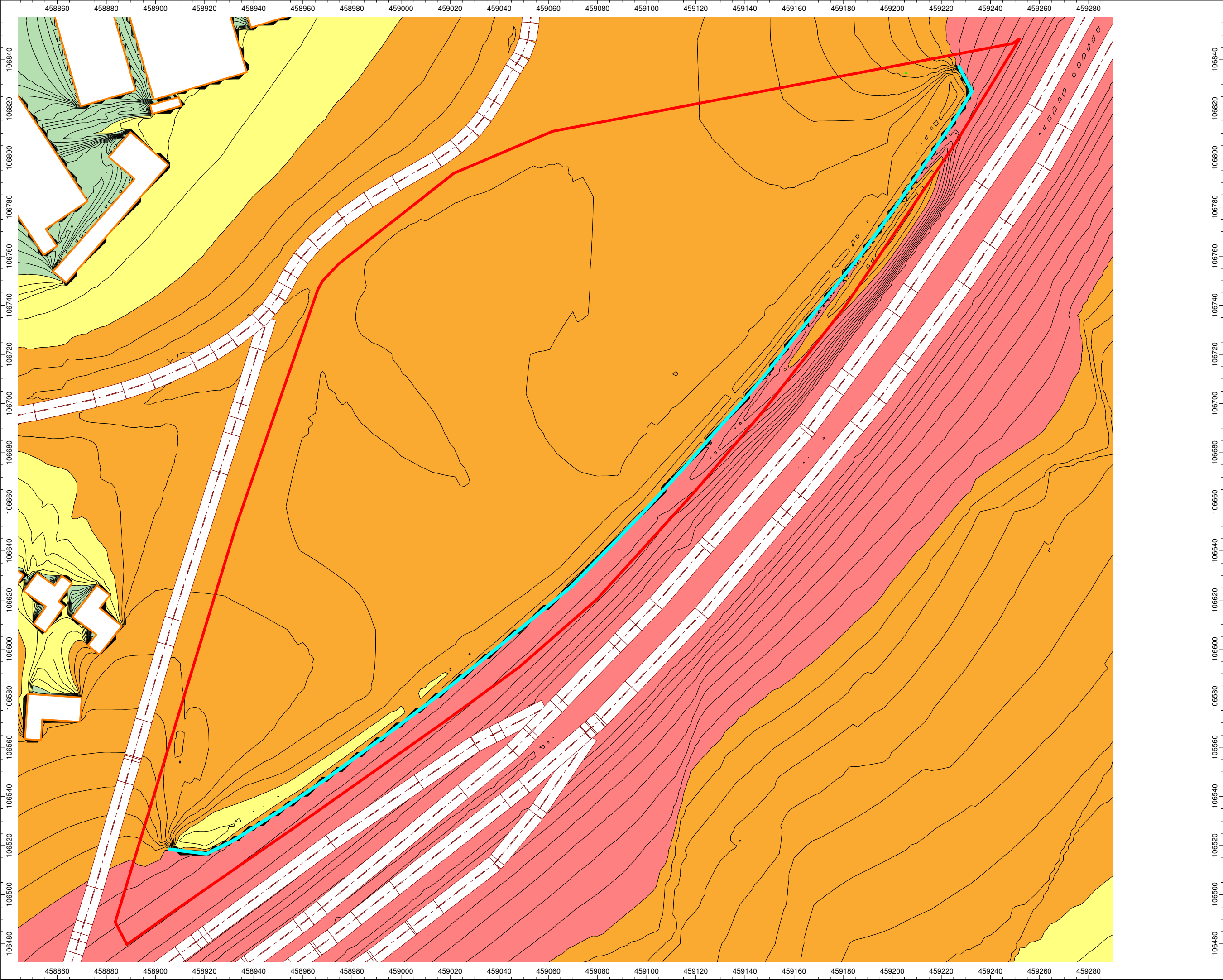
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Project:
Pinks Hill, Fareham

Project Number:
A103358

Drawing Title / Scenario:
Existing Daytime LAeq16hour
Noise Levels
(with mitigation)

Drawing Number:
SK05

Key:

Site Boundary: —

2m bund & 2m Barrier: —

0.0 - 55.0 dB
55.0 - 60.0 dB
60.0 - 70.0 dB
>70.0 dB

Scale : Not to scale

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