

Comment on the Draft Fareham Local Plan 2036

How to have your say

Complete this form to comment on the Draft Local Plan. Please submit it to the Council by Friday 8 December 2017. You can download the pdf and type on to it before emailing it back to consultation@fareham.gov.uk. You can leave more than one comment.

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Please provide the proposed policy, page number or paragraph number in the Draft Local Plan or Evidence Base you want to comment on

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Organisation/Company (if you are representing one)

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Address Line 2

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Town

Postcode

Your agent's details (if applicable)

Name

Organisation/Company (if you are representing one)

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1.0 Introduction

- 1.1 WYG Planning and Environment has been instructed to submit a representation on the Fareham Local Plan 2036. Specifically, this seeks to promote the Land at Brook Avenue site in Warsash (SHLAA ID: 3050).
- 1.2 Land at Brook Avenue is a 2.04 ha site comprising two fields that are currently used for the keeping of horses. Historically, these fields were used for horticultural purposes. Surrounding land uses are predominantly residential with some garden nurseries also present to the north of the site.

2.0 Land at Brook Avenue, Warsash

- 2.1 This site was submitted as part of the Fareham Borough Council Call for Sites exercise in December 2011 and most recently in December 2015.
- 2.2 The Strategic Housing Land Availability Assessment (SHLAA) (October 2017), a key evidence base document for the Local Plan 2036, assesses this site and concludes that it is a suitable site for housing development that is both available and achievable.
- 2.3 The site was also appraised in the Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017), another key evidence base document.
- 2.4 In particular, the site is considered to have a '*likely strong positive effect*' when assessed against the following SEA Objectives:
 - SEA1: To provide good quality and sustainable housing for all.
 - SEA6: To minimise air, water, light and noise pollution.
- 2.5 A '*likely positive effect*' was scored against the following assessment criteria:
 - SEA3: To conserve and enhance the character of the landscape.
 - SEA5: To minimise carbon emissions and promote adaptation to climate change.
 - SEA11: To create a healthy and safe community.
- 2.6 It is important to note that this assessment does not consider that the site is likely to have '*likely adverse effects*' or '*likely strong adverse effects*' when assessed according to any of the SEA objectives.
- 2.7 The Housing Site Selection Background Paper (October 2017) acknowledges the positive assessment of the site concluding that: '*Overall the site has a good SA*

outcome. The site would require careful consideration for pedestrian access and highway lighting which may alter the character of the immediate area. The site would also not provide a defendable or clear urban boundary into the future. There are other developable sites that contribute more favourably to the Site Selection Priorities which includes the site north and south of Greenway Lane. These comments are discussed further in the following paragraphs.

- 2.8 Highways safety has not been raised as a concern in any of the evidence base documents that support the Fareham Local Plan 2036 and as set out in our submissions as part of the Call for Sites exercise, there are a number of options for accessing the site. The points relating to pedestrian access and highway lighting within the Housing Site Selection Background Paper (October 2017) have been noted and will be considered in full as proposals for this site progresses further. These are not however, considered to be insurmountable issues that would prevent an allocation on this site coming forward.
- 2.9 The Housing Site Selection Background Paper (October 2017) also advises that the site would: *'...also not provide a defendable or clear urban boundary into the future'*. This is not considered to be a reasonable justification for discounting this site for allocation within the Local Plan 2036. It is common for urban area boundaries to be amended when new site allocations are proposed and there is no reason why the urban area boundary for Warsash could not be amended if Land at Brook Avenue were included in the plan as a site allocation for housing.
- 2.10 Furthermore, the Housing Site Selection Background Paper (October 2017) advises that the site has been discounted as: *'There are other developable sites that contribute more favourably to the Site Selection Priorities'*. This is disputed as a number of allocated sites perform less favourably within the Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017) as detailed in their individual assessments in this evidence base document. The following paragraphs provide a couple of examples.
- 2.11 Site allocation HA10: Funtley Road South is considered to have negative effects when assessed against:
- SEA3: To conserve and enhance the character of the landscape.
 - SEA4: To promote accessibility and encourage travel by sustainable means.
 - SEA7: To conserve and enhance biodiversity.
- 2.12 Site allocation HA18: Funtley Road North is considered to have the following negative effects:
- SEA3: To conserve and enhance the character of the landscape.

- SEA4: To promote accessibility and encourage travel by sustainable means.
- SEA8: To conserve and manage natural resources (water, land, minerals, agricultural land, materials).

2.13 Site allocation HA5: Romsey Avenue is considered to have the following negative effects:

- SEA8: To conserve and manage natural resources (water, land, minerals, agricultural land, materials).

2.14 Site allocation HA12: Moraunt Drive is considered to have the following negative effects:

- SEA3: To conserve and enhance the character of the landscape.
- SEA11: To create a healthy and safe community.

2.15 It is apparent that a number of proposed allocations perform less favourably in sustainability terms, potentially giving rise to adverse impacts relating to landscape, accessibility, biodiversity, use of natural resources and the provision of healthy and safe communities. Land East of Brook Avenue scores highly in the supporting Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036 (October 2017) and constitutes a more appropriate site for residential allocation than several of the proposed allocations.

2.16 This site is promoted for a yield of approximately 48 dwellings on a developable area of approximately 1.6 ha. This would facilitate the provision of the required amount of open space on this site whilst still providing sufficient space to accommodate residential development at 30 dph. It is noted that there are no specific site constraints that may further impact on the proposed yield.

3.0 Deliverability

3.1 With regards to deliverability, the site owners are committed to delivering the site in a timely manner and there are no site constraints that would prevent development being delivered quickly.

3.2 At the intended delivery rate, this site could contribute 48 dwellings towards the 5YHLS shortfall and is therefore, deliverable in the short term. This is contrary to the proposed delivery of housing in the draft Local Plan which states that Welborne and other large housing allocations: *'...will take several years to complete. This will result in a natural delivery of homes focussed in the middle and latter points of the plan period'*.



- 3.3 The proposed stepped delivery rate means that the past under-supply of dwellings against OAN in the first six years of the plan will only start to be addressed in five years time when annual delivery rates are projected to exceed the OAN figure (420 dpa). This approach does not accord with advice from the Government which states that: *'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to co-operate'* (NPPG Paragraph: 035, Reference ID: 3-035-20140306). As such, it is considered that the draft Local Plan fails to properly plan for housing needs in the Borough at the appropriate time and that proposed policy H1: Strategic Housing Provision and DA1: Development Allocations are both unsound in this respect.

4.0 Conclusion

- 4.1 Land at Brook Avenue is a deliverable site that could provide much-needed housing within the Borough over the next five years, responding to the current 5YHLS shortfall. There are no significant site constraints that would prevent development coming forward on this site and evidence base documents supporting the Local Plan 2036 clearly indicate that the site scores highly in terms of sustainability, providing more benefits than some of the proposed site allocations. As such, this site should be allocated for residential development in as part of Policy DA1: Development Allocations.