

7 December 2017
Delivered by email

Planning Policy
Fareham Borough Council
Civic Offices
Civic Way
Fareham
Hampshire
PO16 7AZ

Ref: SOUW3002

Dear Sirs

REPRESENTATIONS TO FAREHAM BOROUGH DRAFT LOCAL PLAN 2036

On behalf of our client, Southampton Solent University (SSU), we write to make representations to the current consultation on the Fareham Borough Draft Local Plan 2036.

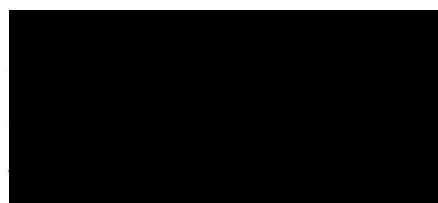
The Council will be aware that SSU owns and operates Warsash Maritime Academy (WMA), part of the University's School of Maritime Science and Engineering. The University intends to continue its operations at Warsash but will be relocating its professional and higher level maritime education programmes from the Upper Site to Southampton City Centre. This will assist the University in its aims of strengthening and embedding maritime education across the University. Teaching for the fire school, maritime safety and offshore first aid and medical and seamanship courses will remain on the Lower Site of the Warsash campus, with investment plans for new and improved facilities.

The Upper Site was submitted to the Council for consideration as a potential housing site in response to a call-for-sites exercise and was assessed within the Council's SHLAA. It has now been taken forward as a proposed allocation within the Draft Local Plan. SSU fully supports the principle of the proposed allocation (HA7) of the Upper Site of the Warsash Maritime Academy.

In order to ensure that the proposed allocation does not unduly constrain the development potential of the site we request several changes to the draft allocation policy, as set out below. These will enable the development potential of the site to be realised in terms of delivering housing or other compatible uses whilst taking account of key constraints.

Proposed Use

The draft allocation identifies the proposed use of the site for residential dwellings. SSU supports this allocation but flexibility is sought in terms of other uses that might be included to ensure that the site makes the greatest possible contribution to meeting identified needs (including the need for housing) and that the most suitable range of uses is developed. This will ensure that best use is made of the



development potential offered by this brownfield site. One example is the retention and conversion of the Listed Moyana Building. The form and layout of the building is such that it will not be straight forward to convert and it may lend itself better to conversion, both in terms of viability and design, to either a different form of residential use or to non-residential use which is compatible with the wider redevelopment of the site, such as a hotel.

To ensure that the allocation provides sufficient flexibility to enable a viable and successful redevelopment of the site which maximises its development potential we request that the wording is amended to:

Proposed Use: Residential (including C2 and C3) or other compatible uses (e.g. Hotel (C1)).

Indicative Capacity

The Indicative Capacity for the allocation is set to 100 dwellings. This follows initial work to inform the SHLAA submission document and within this it was indicated that further capacity work would be undertaken to fully understand the potential of the site. This work is underway and it is hoped that the results will be available to share with the Council in the New Year. The additional work on the potential capacity of the site is suggesting that the indicative capacity should be raised to 150-200 dwellings. Variations depend on how the Listed Building is converted, the types of residential properties which are delivered at the site and heights (for which the allocation allows for up to 4-storeys).

To take account of this additional work we request that the indicative capacity of the site is increased to 150-200 dwellings.

Site Boundary and Site Area

In considering its future requirements for the Warsash Maritime Academy Lower Site, the University intends to retain the site of the MOS building which is currently shown as forming part of the draft allocation. Retaining the access road to the south of the MOS building, will allow the University to have a dedicated access to the Lower Campus.

We request that the allocation boundary is amended to remove the site of the MOS building and the access road. The "Educational Facility outside the Urban Boundaries" designation should then be extended to cover the site of the MOS building and access road.

When the University disposes of the Upper Site an area of land to the west of the built development on the Upper Site which is no longer required for academic purposes will also be included. To make it clear that this will no longer form part of the campus the draft allocation should be extended westwards into this part of the campus so that it is removed from the designation 'Educational Facilities outside the Urban Boundaries'.

These suggested changes are shown in Appendix 1.

As a result of the amended boundary the area of the allocation will increase from 2.5ha to 2.94ha.

Detailed Allocation Criteria

Part A

As noted above, the indicative site capacity of the site should be increased to 150-200 dwellings.

The allocation notes that the Listed Buildings will be converted to a residential use. We seek further flexibility in the allocation to allow conversion to "other compatible uses" which the buildings may be better

suited to. The NPPF is clear that when considering the future of Listed Buildings weight must be given to the 'optimal viable use'.

SSU requests that the wording is amended to:

"The quantum of housing proposed shall be broadly consistent with the indicative site capacity, which is based on both new development and the conversion of the existing statutory Listed Buildings to an optimal viable use which may comprise residential or other compatible uses;"

Part B

SSU supports the requirement for primary highway access to be focused on Newtown Road. The University will require adequate access to be maintained to the Lower Site of the campus and it is anticipated that this will be achieved through the retention of the existing access to the north of the site within the University's ownership and control, as outlined above. It would be appropriate for the allocation site to be accessed independently from the retained Lower Site.

Part C

SSU supports the 4-storey limit on the height of new buildings which may be brought forward as part of the redevelopment of the site. Whilst the scale of residential buildings to the east of Newtown Road is smaller, the existing WMA Upper Site has its own distinct character with a number of four storey buildings including the Blythe, Admiral Jellicoe and Whalley Wakeford buildings alongside the five storey Shackleton block. The ability to replace existing buildings with new buildings of up to four storeys will allow a higher density of development to be achieved without compromising the environmental quality of the site.

Part D

SSU supports the principle of providing pedestrian and cycling facilities. The extent of the connection to 'nearby facilities and services' will be considered as part of a future planning application. Therefore, the wording should be amended to read:

"...as well as providing connectivity with nearby facilities and services, the extent of which will be considered as part of a future planning application".

Part E

SSU supports the requirement for the site frontage on Newton Lane to be well-landscaped. The wording should not, however, be interpreted as a requirement for landscaping to 'hide' or entirely screen the development. The site does benefit from some existing landscaping to the Newtown Road frontage but existing built development is clearly visible and forms part of the character of the local area.

Part F

SSU supports the requirement for a Heritage Statement to be submitted with a future planning application to assess the impacts of development on the Listed Buildings.

Part G

SSU recognises that it will be necessary to secure the future use of the Listed Buildings linked to the implementation of the development of the wider site. Because the Listed Buildings are Listed at Grade II, as opposed to Grade II* or Grade I, Historic England may not wish to be extensively involved. Therefore, it should not be a prerequisite that Historic England's agreement is required. In bringing a planning application forward they will of course need to be consulted and the policy should be re-worded to reflect this.

SSU supports the wording which states 'deliver an appropriate re-use of the listed buildings' as this recognises that a conversion to residential dwellings may not be the most appropriate or viable use. The wording of the rest of Part G should be amended to reflect our above comments regarding the proposed use of the site. SSU requests that Part G is amended to read:

"There is a binding agreement that will deliver an appropriate re-use of the listed buildings (subject to consultation with Historic England) within a phased programme of works linked to the delivery of residential development or other compatible uses;"

Where the draft policy refers to "a binding agreement", this should not be taken to refer to a legal agreement under s.106 of the Town and Country Planning Act, the re-use of the Listed Buildings could be secured by the imposition of a planning condition.

Part H

It is important that efforts are made to incorporate the best quality trees into a future development proposal, however, SSU objects to the requirement for all trees on the site to be retained.

Area Tree Preservation Orders are recognised to be a 'blunt-tool' in dealing with tree protection. Moreover, the Area Tree Preservation Order which is imposed upon the site dates from 1993. As part of its work to assess the development potential of the Upper Site the University has commissioned an updated Tree Survey of the entire Campus. Once this has been completed that University will seek to meet with the Council with a view to reviewing and refining the Area Tree Preservation Order such that it identifies and protects the most important trees on both the Lower and Upper Sites.

SSU requests that the wording of Part H is updated to require the retention of only the most important trees.

Part I

SSU supports the requirement for boundary trees and hedgerows on the western boundary to be retained and incorporated within the design of the development in order to provide a buffer to priority habitats.

Part J

Part J should be removed as the requirement to consider Coastal Change Management Areas is set out within draft Policy NE4.

Part K

We agree that it is reasonable to require development to fund the infrastructure needed to support it or mitigate any adverse impacts it directly creates. It should be noted that the Warsash Martine Academy is a brownfield site, meaning that it has an existing use which has a baseline impact on infrastructure. Furthermore, there will be significant costs associated with preparing the site for development in comparison to a greenfield site. The retention and reuse of the Listed Buildings will also give rise to additional costs in bringing the site forward. When calculating the contributions towards infrastructure required from a future development, regard should be had to these points to ensure that it is viable.

We request that the wording is amended to:

"Where appropriate and not covered by CIL, proposals shall either provide directly, or provide a financial contribution towards the delivery (and maintenance where deemed necessary) of the following infrastructure, in line with the Council's Planning Obligations SPD:

- *Off-site highway improvement and mitigations works; and*

- *Local schools and early-years childcare infrastructure (as identified by the Local Education Authority); and*
- *On-site public open space (in accordance with the Council's Planning Obligations SPD).*

Consideration will be given to abnormal costs associated with the redevelopment of this brownfield site and the reuse of Listed Buildings to ensure future development remains viable. Similarly, the impact of the existing or lawful use of the site on local infrastructure will be considered when calculating additional infrastructure requirements for its redevelopment"

The Proposals Map

We request the following revisions are made to the Proposals Map to reflect our comments above:

- MOS Building and existing access removed from the draft allocation;
- Education Facility Outside the Urban Area designation extended to cover the retained MOS Building and existing access; and
- Draft allocation extended westwards to incorporate additional land which will be marketed with the Upper Site.

These changes are shown on the plan at Appendix 1 of this letter.

Draft Local Plan Policies

In addition to commenting on the proposed allocation of the Upper Site we wish to comment on several draft policies which could impact upon bringing the allocation forward for development. These policies are:

- Policy H1 Strategic Housing Provision;
- Policy H7 Self and Custom Build Homes; and
- Policy NE3 Solent Special Protection Areas.

Policy H1 Strategic Housing Provision

Policy H1 sets out a requirement of 11,300 net additional dwellings to be delivered within the 24 year plan period between 2011/12 – 2035/36.

This figure is underpinned by the Spatial Position Statement (June 2016) (SPS), produced by the Partnership for Urban South Hampshire (PUSH), which is in turn informed by the Objectively Assessed Housing Need Update (April 2016) (OAHNU).

This evidence has been produced at the sub-regional level for the constituent authorities of South Hampshire. This underlines the importance of ensuring that it is up-to-date, robust and properly scrutinised, including through the Local Plan examination. Fareham is responsible for ensuring that this work is updated to inform its plan making, if it is to be found sound.

The Objectively Assessed Housing Need Update report concludes that 116,400 dwellings (4,850dpa) are required in the sub-region in the period 24 year plan period 2011/12 to 2035/36. For Fareham Borough the OAN is 420 dpa. This is split between the Portsmouth (East) and Southampton (West) Housing Market Areas (HMA) where this is identified need for 305dpa and 115dpa, respectively.

Planning Practice Guidance (PPG) indicates that local needs assessments should be informed by the latest available information (Paragraph: 016 Reference ID: 2a-016-20150227). The OAHNU is based on the out of date 2012-based subnational population projections (SNPP). The OAHNU acknowledges that there is likely to be an increase in population projections to higher net migration, and has sought to account for this by using data in the mid-year population estimates. However, now that the new baseline demographic data is available (2014-based SNPP) the report should be updated. The 2014 SNPP for Hampshire County are showing an increase in population across all age groups. Although this covers a wider area, it is probable that the same pattern will be evident in South Hampshire.

To arrive at expected household growth the headship rates set out in the 2012-based CLG Household Projections are applied. This data has since been superseded by the 2014 Projections. Notwithstanding, Figures 12 -15 of the OAHNU show a clear reduction in formation rates between the 2008 (pre-recession) and 2011/12 data for the younger age cohorts, particularly those aged 25-34. The report indicates that there is no suggestion of any suppression in this age group either in the past or projected forward (para 2.79). However, we would dispute this assertion and suggest that the application of 2012 headship rates will suppress housing need. The PPG advises that it may be appropriate adjust household formation rates to avoid carrying forward past suppressed trends. As such, it is considered that the 2008 headship rates would be a more appropriate.

The National Planning Policy Framework (paragraph 47) is clear that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF.

The recently published Government consultation on Local Housing Need suggests increasing the housing requirement for the Borough from 452dpa (average) as set out in DLP, to 531dpa as per the Government requirement (not including any duty to co-operate uplift).

Although this proposal is still at consultation stage, it is important that the Council is aware of its implications, and the potential for further supply to be identified to meet needs. The DLP should be sufficiently flexible to meet this uplift should the Government take the proposals forward.

Policy H7 Self and Custom Build Homes

This policy does not give adequate consideration to sites where the delivery of self or custom build homes might not be appropriate or feasible, for example sites containing Listed Buildings or sites where the form of development anticipated (e.g. apartments in 4-storey buildings) militates against self or custom-build homes. The policy should seek self and custom build homes where appropriate rather than require 5% provision from all sites providing 100 dwellings or more.

We request that the wording of this part of the policy is amended to:

Where appropriate in the context of the form, and scale of development proposed, on sites of 100 dwellings or more (gross), 5% of the overall dwellings should be provided through the provision of serviced plots for self or custom build need.

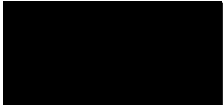
Policy NE3

We recognise the need to provide adequate protection for Special Protection Areas and to mitigate Cumulative Effects of residential development. However, consideration should be given to the existing use of sites (both residential and other) where the existing development currently has, or has potential to have, an impact on the SPA. The impact of existing uses should be taken into account when considering the

mitigation to be requested from residential re-development and should be factored in to any request for mitigation contributions as a result of development.

We thank the Council for this opportunity to comment on the Draft Local Plan and look forward to further dialogue.

Yours sincerely

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Senior Planner

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Appendix 1: Site Plan

