

[REDACTED]

From: [REDACTED]
Sent: 07 December 2017 17:19
To: Consultation
Subject: Draft Local Plan 2036 consultation - Land West of Seafield Road and Moraunt Drive, Portchester
Attachments: 07.12.17 - Draft Fareham Local Plan 2036 - Seafield Road reps.pdf

Dear Sir/Madam, [REDACTED]

Please find attached representation prepared in respect of Land West of Seafield Road and Moraunt Drive, Portchester in response to the Draft Local Plan 2036 consultation.

Kind regards,

HA12 + HA4
Dawson

[REDACTED]

[REDACTED]

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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.

Provide us with your details

Please provide your contact details at the end of this survey. Doing this will help us to understand where people's views are coming from. Your name and address may be published but it will not be used for any other purposes.

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

Policy DA1

A chapter or policy -

Please comment below.

Development Allocation -

DA1

Please refer to enclosed representation letter

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

Paragraphs 12.1 to 12.10

Please comment below.

Please refer to enclosed representation letter

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

Site Allocation HA12

Please comment below.

Please refer to enclosed representation letter

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

Please comment below.

A bit about you

You will need to provide your contact details at the end of this survey. This is a legal requirement in order for your comments to be taken into account and your address may be published. It will not be used for any other purposes.

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Address Line 2

Address Line 3

Town

Postcode

Your agent's details (if applicable)

Name

Organisation/Company (if you are representing one)

Address Line 1

Address Line 2

Address Line 3

Town

Postcode



Our Ref: EW/215

VIA EMAIL

07 December 2017

Dear Sir/Madam,

**Draft Fareham Local Plan 2036 -
Land West of Seafield Road and Moraunt Drive**

This representation is made on behalf of Radian Group by Bryan Jezeph Consultancy in response to the public consultation for Fareham Borough's Draft Local Plan 2036 document. Specifically, Radian is responding to draft Policy DA1 (Development Allocations), paragraphs 12.1 to 12.10 of the Plan, and the site allocation brief under reference HA12.

The Council have opted to include the site known as 'Moraunt Drive' (ref: HA12) as a site allocation for housing in the draft Local Plan 2036. The site is under option to Radian Group.

The site comprises approximately 3.6 ha of land located to the west of Seafield Road, Portchester. The site is bounded by residential dwellings of Seafield Road, Moraunt Drive and Cadour Drive to the east; and residential dwellings of Tattershall Crescent and Sissinghurst Road to the north. To the south of the site lies the coastline to Portsmouth Harbour (which is designated as SSSI/Ramsar/SPA), and to the west is dense woodland.

The site is divided laterally by Wicor Path, a public footpath. This is ancient footpath that linked Portchester Castle to Wicor Farm. Most of the land lies in Flood Zone 1 but part of the area to the south of Wicor Path lies within Flood Zones 2 and 3. Therefore, the developable area of the site is considered to be the parcel of land north of Wicor Path, which is approximately 1.62 ha in area.

In October 2017, the Council published its Strategic Housing Land Availability Assessment (SHLAA). The site was considered in the SHLAA as a suitable site for development. Additionally, it was assessed by the Council that the site was 'available' and development 'achievable'. Radian support these conclusions made by the Council for the site.

In October 2017, the Council also published its 'Housing Site Selection' background paper. The purpose of the paper is to 'explain, in broad terms, the processes undertaken to inform the selection of housing sites for the Draft Fareham Local Plan 2036. It is explained in the paper that the SHLAA and Sustainability Appraisal (SA) were used to inform the selection of sites to be allocated for housing in the Draft Local Plan. The paper then gives an overview for the site, as stated below: -



Overall this site has a good sustainability appraisal outcome with low landscape sensitivity and minimal highway works required to support this quantum of development. The southern area would be available as public open space secured alongside the development which will provide a benefit for the wider community into the long term and retain an undeveloped part of the coastal plain. The site is capable of being developed in the short/medium term.

As such, the paper gives the overall conclusion of the site as 'preferred'. Radian support this conclusion made for the assessment of the site.

The site is therefore included as a site allocation for housing in the draft Local Plan 2036 under reference HA12, which Radian supports. However, the site allocation brief under HA12 then lists out site specific requirements for any proposal for development of the site to meet, and are presented below:

- a) The quantum of housing proposed is broadly consistent with the indicative site capacity, on the basis that open space is provided immediately off-site; and
- b) Primary highway access shall be focused on Moraunt Drive; and
- c) The height of buildings shall be limited to a maximum of 2 storeys; and
- d) Proposals must be mindful to the visual sensitivities associated with the area and should retain and reinforce existing boundary vegetation to minimise any visual impacts to Wicor Path and neighbouring residents; and
- e) Safe pedestrian and cycle connectivity with the Wicor Path Public Right of Way in the south of the site and with Seafield Road to the east of the site; and
- f) Proposals shall have regard to the potential for Brent Geese and Waders, and shall undertake an overwintering survey to determine the presence and frequency of any Brent Geese and Waders that use the site (in accordance with Policy NE3), with mitigation identified as appropriate, to the satisfaction of Natural England; and
- g) 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
 - Enhancements to Orchard Grove / Commodore Park public open space to the immediate south and west of the site and retention in perpetuity (in line with the Council's Planning Obligations SPD).

BJC

Radian support and agree with criterions b), d), f) of the brief.

However, Radian would like to make amendments to criterions a), c), e), and g), to add further clarity and/or flexibility to the site brief. These are discussed in turn below:

a) The quantum of housing proposed is broadly consistent with the indicative site capacity, on the basis that open space is provided immediately off-site

It is considered that the above wording of criterion a) should take into consideration of draft Policy CF6 (Provision and Protection of Open Space) of the draft Local Plan 2036. Policy CF6 points to the Council's Planning Obligations SPD (PO SPD) for proposals to take into consideration when considering provision for open space. The PO SPD explains in Paragraph 4.9 that 'planning obligations are no longer used to secure general tariff-style contributions, such as for the provision of **off-site public open space** and recreational facilities' (own emphasis added).

Furthermore, the PO SPD states that for development of 20-49 dwellings, on-site open space 'may be required depending on circumstances and location'.

Criterion a) therefore does not align with the approach set in the PO SPD as it infers that public open space would definitely be provided off-site as part of any proposal that is consistent with the indicative yield of 49 dwellings. This is contrary to the PO SPD where it is explained that off-site provision is no longer sought through planning obligations, and that on-site provision for 20-49 dwellings is determined on a case-by-case basis. This does not give sufficient flexibility to any development proposal for the site, especially to a proposal for 20-49 dwellings which does not offer upfront the provision of off-site public space.

Radian would therefore like to have criterion a) reworded with reference to open space omitted.

c) The height of buildings shall be limited to a maximum of 2 storeys

Radian considers that criterion c) should not impose prescriptive limitations on building heights in absence of a detailed landscape impact assessment, which could be provided as part of any planning application for development. Radian considers that matters of building height should be the matter for proper consideration through the planning application process.

It may be, for instance, that a landscape impact assessment reveals that 2.5 storey buildings, or even higher, could be appropriate for the site. Radian therefore do not feel it appropriate for any prescriptive limitations to be imposed for the site through the local plan making process, and would request that this criterion is omitted or reworded as the following (or to this effect): 'the height of any proposed buildings should be informed and supported by a landscape and visual impact assessment for the site'.

BJC

e) Safe pedestrian and cycle connectivity with the Wicor Path Public Right of Way in the south of the site and with Seafield Road to the east of the site

Criterion e) suggests that the site could provide for a physical connection to Seafield Road to the east. The only apparent way seems to be by utilising and improving an existing alleyway to the north-east of the site which leads onto Seafield Road.

However, there are significant ownership and legal barriers to implementing a path to this north-east boundary, and therefore, it is considered this would prove difficult to realise and would be unfeasible and unviable to any proposed scheme.

Radian therefore do not see the merit of including criterion e) in the site brief as the site is capable of providing connectivity for pedestrian and cycles to the wider area through other means, such as via Moraunt Drive. Radian therefore request criterion e) to be omitted or amended to include viability as a consideration.

g) 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

Radian consider that this criterion should make explicit reference to the Council's Community Infrastructure Levy schedule.

Conclusions

In October 2017, the Council published its Strategic Housing Land Availability Assessment (SHLAA). The site was considered in the SHLAA as a suitable site for development. Additionally, it was assessed by the Council that the site was 'available' and development 'achievable'. Radian support these conclusions made by the Council for the site.

The site is included as a site allocation for housing in the draft Local Plan 2036 under reference HA12, which Radian supports

Radian support and agree with points b), d), f) of the brief. However, Radian would like to make amendments to points a), c), e), and g), to add further clarity and/or flexibility to the site brief.

Yours faithfully,



On behalf of Radian Group