

**Fareham Local Plan 2037
Revised**

**Examination Statement
Matter 7- Housing Land
Supply**

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Prepared on behalf of Raymond Brown Rookery Properties

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<u>Contents:</u>	Page
1.0 INTRODUCTION	1
2.0 RESPONSE TO INSPECTORS QUESTIONS	2

1.0 **Introduction**

- 1.1 This Statement has been prepared by Southern Planning Practice Ltd on behalf of Raymond Brown Rookery Properties who own land at Rookery Farm, Botley Road, Swanwick which was allocated in the Supplement to the Draft Local Plan in January 2020; however, it was subsequently removed as an allocation from the Regulation 19 Submission Version of the Local Plan. This Statement is prepared in response to the Inspector's Matters, Issues and Questions.
- 1.2 It is pertinent to note that representations have been made on behalf of our client, Raymond Brown Rookery Properties throughout the preparation of the emerging Local Plan. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan, this statement draws on previous responses where necessary. We would like to highlight that all of our comments made in our December 2020 representations to the Regulation 19 version of the Local Plan as well as our July 2021 to the Revised Regulation 19 version of the Plan are still relevant and should be considered as part of the Examination.
- 1.3 These representations respond to the Inspector's questions within Matter 7 – Housing Land Supply. This Statement does not respond to all of the questions raised under Matter 7 however those which are considered to be most relevant have been responded to.
- 1.4 The answers to the Inspector's questions have been considered in the context of the tests of 'soundness' as required by paragraph 35 of the National Planning Policy Framework (NPPF).
- 1.5 The statement has been prepared to assist the Inspector in seeking to answer the questions posed under Matter of the Inspector's Matters, Issues and Questions.

2.0 Response to Inspector's Questions

Question 1 – Is the reliance on Welborne Garden Village to deliver half of the housing requirement for Fareham justified as the most appropriate way of achieving sustainable development, the supply of new homes and the growth of the borough? If not, what are the alternatives?

- 2.1 The council has been relying on Welborne for many years to deliver a significant number of houses. However due to delays in progressing the development, together with other matters, the council has a very low 5 year housing land supply.
- 2.2 As a result of this, the authority has either lost a number of appeals on greenfield sites and/or has had to allocate more greenfield land to housing development.
- 2.3 It is only in recent years that funding has been secured for Junction 10/A32 highway improvements. This requires principally a contribution from the developer of £50 million (£10 million contingency) + £41 million from Homes England in the form of a grant which must be repaid. The Council is also required to recover the grant from the Developer at Welborne if and when the Welborne development achieves a specified profit level,
- 2.4 The developer's contribution to the scheme is therefore approaching £100 million just for the Junction 10/A32 highway improvements and this is without any other contributions or payment for other off site highway works.
- 2.5 The applicant's infrastructure delivery plan (IDP) indicates that there are significant infrastructure requirements in the first 2 years including the access to the M27 and the A32. Together with 15,000 sq mts of commercial floor space, some 690 dwellings are planned to be delivered in this very short phase (up to 2024). Not only would the scheme rely on significant further funding for the developer in these early years but also to the practicalities of building a motorway junction in just two years seem unrealistic.
- 2.6 However, could the council clarify the inconsistency between the officer report and the legal agreement for the planning application. The legal agreement states that 1160 houses can be built before the Junction 10 works are complete, yet the officers report makes no mention of

this, only referring to phase 1 below which indicates 690 houses with the implementation of Junction 10 Sequence 1 (2019/20-2023/24): Sequence one is to provide the following:

- Approximately 690 homes;
- Commencement of the village centre including:
 - Village Centre Community Building
 - Health Outreach facility using the Village Centre retail outlets
- Commencement of the eastern employment area;
- Construction of the new Junction 10;
- Construction of the new A32 Northern Roundabout;
- Alterations to the Knowle Road Roundabout;
- Undergrounding of overhead power lines;
- Provision of onsite drainage;
- Diversion of water mains (if required for detailed layout);
- Provision of children’s play areas within neighbourhoods;
- Delivery of strategic planting;
- Delivery of Dashwood SANG;
- Provision of the northern segment of the main Central Park;
- First Primary School playing fields. (It is noted that the school is shown in sequence 2 but as described elsewhere in this report the detailed delivery of the school has been the subject of ongoing discussion with the Local Education Authority and is now likely to be delivered earlier than sequence 2).

2.7 In terms of housing delivery, the officers report to planning committee in September 2021 outlined the phasing of the development. Housing delivery is earmarked as follows:



Sequence	Application IDP		
	Period	Years	Units
1	2019-2024	5	690
2	2024-2029	5	1420
3	2029-2034	5	1550
4	2034-2039	5	1500
5	2039-2042	3	840
TOTALS		23	6000

- 2.8 According to the Deputy Leader of Hampshire County Council (HCC) at present there is no assigned contractor and works are not due to start until 2023. Is it feasible therefore to complete the junction and build 690 houses in one year? This is notwithstanding a significant number of pre- commencement conditions which are still required to be discharged together with the submission of reserved matters.

- 2.9 It should be noted that nearly 4,000 of the houses would not be delivered till after 2029 meaning that there would be a significant reliance on other sites and, having regard to the very low starting point, there is a need for front loaded delivery of readily available, achievable and deliverable sites, for example Rookery Farm and other Brownfield sites.

- 2.10 Reliance on Welborne Garden Village to deliver half of the housing requirement for Fareham is, therefore, not justified as the most appropriate way of achieving sustainable development for the supply of new homes and the growth of the borough. The site is overly complex and not capable of delivery with the timescales indicated.

What are the alternatives?

- 2.11 Developing a greater spread of sites with a priority for brownfield sites, for example the site at Rookery Farm which was previously included in an earlier version of the plan, as a sustainable and immediately available development site.

**Question 2- Does the plan provide sufficient contingency should this site be delayed?
Is the 11% additional supply set out in para 4.12 adequate?**

- 2.12 Given the constraints of delivering the Welborne development, as set out above, a contingency of only 11% is woefully inadequate. By way of example if there are delays to the first phase of Welborne this would eat up approximately 50-60% of the contingency for under delivery.
- 2.13 Furthermore Fareham has a history of under delivery, particularly as demonstrated by the recent Housing Delivery Test results, and due to land assembly issues there is no guarantee that some of the sites will come forward in the local plan time scale. These include the town centre site and the railway station sites, FTC3, FTC4 BL1 which add up to 834 houses.
- 2.14 In answer to the Inspector's question, the 11% contingency is not sufficient.

Question 3 – We do not intend to submit any further written response in respect of this question.

Question 4 - What compelling evidence is there in accordance with paragraph 71 of the Framework that windfall sites should be part of the anticipated supply? Are the windfall projections in Table 2 of the Housing Windfall Background Topic Paper. ie. 51 dwellings on both small and large sites over the plan period justified?

- 2.15 It is acknowledged that the Revised Local Plan sets out that part of the Housing Provision of Fareham Borough is to be met through unexpected (windfall) development. There is no issue in principle with including an allowance for windfall development; however the figure must be realistic and based on evidence as to how many homes can be achieved through such provision as per the requirements of paragraph 71 of the NPPF.
- 2.16 The NPPF Glossary defines windfall sites as '*sites not specifically identified in the development plan*'. Paragraph 71 of the NPPF sets out that where an allowance for windfall sites is to be made, there should be compelling evidence that they will provide a reliable source of supply, using the strategic housing land availability evidence, historic windfall delivery rates and expected future trends to support such an allowance.

- 2.17 In this case, the Council's housing provision is relying on 1,224 new homes to come forward through windfall development out of total of 9,556 new homes as set out in Table 4.2 of the Local Plan. The number of windfall homes has not changed since the previous draft Local Plan. The windfall allowance equates to approximately 12.8% of the overall housing provision. This figure is considered to be too high and it appears the council are over reliant on windfall sites particularly given their past delivery rates.
- 2.18 Whilst it is appreciated that the methodology for calculating windfall allowances has changed over time, it is worth noting that in the currently adopted Local Plan Part 2: Development Sites and Policies (2015), the average historic windfall allowance was calculated to be 20 (Appendix F). In the 5 Year Housing Land Supply Position Paper to Planning Committee on 24 June 2020, the Council included a small site windfall allowance of 37 dwellings for each of 2 years (years 4-5).
- 2.19 Further figures on windfall delivery were published in the Housing Windfall Projections Background Paper (June 2020) (HOP007). Table 2 of this background paper confirmed that over the period 2009/10 – 2018/19, an annual average of 51 dwellings were delivered for both small and large sites. Paragraph 3.9 of this Background Paper acknowledged that delivery from large windfall sites was significantly higher in the first 3 years of data (2006/07 – 2008/09) and the notable drop in delivery in the following years can likely be attributed to economic changes. Therefore, given the data for the last ten years of windfall sites, it appears unlikely that the council will be able to significantly boost such delivery and therefore are unlikely to deliver 1,224 homes through windfall sites over the plan period.
- 2.20 The figures in Appendix F to Local Plan part 2 do not appear to correlate to figures in Table 2 of HOP007. We would be grateful for clarification.
- 2.21 It is pertinent to note that due to the increased housing requirement as a result of the revised standard method, the Revised Local Plan has sought to allocate more sites for development to meet this need. However, these sites are largely very small (i.e. below 10 dwellings) which would usually come forward for allocation through Neighbourhood Plans or would be windfall sites. In addition, the proposed broad allocation under Policy BL1 further encompasses small town centre, brownfield windfall sites. Therefore, this raises concerns over further small sites

coming forward as 'windfall' development and as such we believe the windfall allowance is unrealistic.

- 2.22 In light of the above, and in answer to the Inspector's question, it is considered that there is no compelling evidence which would suggest that the number of homes allocated for 'windfall' can be achieved over the plan period. As such, Fareham should look to allocate further sites for development to ensure a more realistic and deliverable housing land supply. It is also relevant to note that historic levels of the number of houses delivered through windfall permissions may be artificially high as such planning permissions are more likely to be granted in the absence of an up-to-date Local Plan when paragraph 11 d) of the NPPF is triggered and a presumption in favour of sustainable development is applied. Once the Local Plan is adopted, providing it can demonstrate a 5-year housing land supply, developers may be less likely to submit speculative applications for non-allocated sites due to the costs and risk involved. Therefore, the number of homes provided by windfall sites, particularly larger sites, is likely to decrease when an up-to-date Local Plan is in place.

Questions 5 and 6 – These questions appear to be primarily directed to the Council and we would wish for the opportunity to respond at the Examination hearing, if appropriate.

Question 7 – What evidence is there to support the anticipated delivery rate of Welborne Garden Village? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?

- 2.23 The only evidence put forward is as follows: -

- An outline planning permission.
- An indication of where the funding for Junction 10 will come from.

However, at present: -

- The majority of conditions from the planning permission have yet to be discharged.
- No reserved matters application (apart from junction funding) has been submitted.
- There is no contractor for Junction 10 (as of September 2021).
- There is no indication about the time it would take to construct the houses.

- The planning officers report for the planning permission contradicts the legal agreement in terms of housing delivery in relation to infrastructure.
- All the cost projections are for the junction 10 improvements there is no indication of where the finance will come from for the other infrastructure improvements for example drainage.

2.24 As a result, we would question the timescale of the anticipated delivery rates of Welborne Garden Village. Please also see our response to question 1.

Question 8- Overall does the plan allocate sufficient land to ensure the housing requirement of the borough will be met over the plan period? Is the average delivery of 720 homes per annum in 2028-29 and 2036-37 achievable considering past delivery in the borough?

2.25 We have already submitted reps and responded to earlier matters to the effect that:

a) We do not consider that the Council is properly and effectively planning to meet the housing need through a combination of a number of factors. These have been set out in detail at Section 2 of our July 2021 reps and specific issues have already been addressed under individual matters at this Examination. In summary the objections are multiple, and in places cumulative, covering:

- (i) Objectively Assessed Housing Need – this should be a starting point only;
- (ii) Duty to Co-Operate and Unmet Need – Fareham has not undertaken this Duty in a sound manner;
- (iii) Additional factors Contributing to the Shortfall, including the lack of a 5 year Housing Land Supply Position and Lack of a Contingency Provision;
- (iv) Over-reliance on Welborne to provide a significant proportion of Fareham’s housing, which is considered to be a very high risk strategy, resulting in a need for more sites to be allocated;
- (v) Inability to meet the identified Affordable Housing Provision;
- (vi) Over-reliance on Windfall allowance;
- (vii) Lack of Priority to Brownfield Sites.

b) Furthermore, we do not consider that the Council has allocated sufficient land to ensure that even the housing requirement it has proposed will be met over the plan period in absolute terms. Furthermore, we consider and have addressed that some of the sites allocated may not come forward for development within the local plan period at all or for a much reduced number, for example the town centre sites and others are unsuitable because of landscape impact, including incursion into the strategic gap. There is also an over reliance on the delivery of Welborne which is a very complicated site to bring forward.

2.26 As a result of the examination to date, some more specific concerns have arisen. These fundamental concerns which go to the heart of the soundness of the plan include:

- Incorrect and under provision of an appropriate buffer having regard to the Planning Practice Guidance (Paragraph 010 Reference ID 68-010-2190722 – July 2019) which sets out that where the Housing Delivery Test indicates that delivery has fallen below 85% of the requirement, a 20% buffer should be added, not a 10% buffer. The most recent Housing Delivery Test results confirm that Fareham have only delivered 62% of their housing requirement.
- There is no confidence that the affordable housing provision is correct and can be met. Therefore, this suggests that the housing requirement will need to be re-calculated in accordance with the standard method to reflect this.
- There is also no confidence that the plan or its housing requirement have sought to address the neighbouring authorities' unmet need.

2.27 These matters have been addressed individually elsewhere and there is no need to repeat that evidence here, but there can be no confidence that the Plan allocates sufficient land to ensure that the housing requirement of the borough will be met over the plan period.

2.28 Following on, there is little evidence provided to offer any confidence that the Council's proposed average delivery of 720 homes per annum in 2028-29 and 2036-37 is achievable.

2.29 Core Document FBC008 (Housing Delivery Test Action Plan) at Chart 1 on page 5 sets out the Housing Delivery Performance from 2015/2016 to 2019/20 showing a 'high' of 374 and a

'low' of 285. Core Document FBC027 (FBC AMR 2020-2021) published in February 2022 indicates at 3.1 that this figure dropped to 117 net new dwellings in the period 2020/21.

- 2.30 Whilst it is appreciated that the Covid pandemic has probably affected delivery rates together with the nitrates neutrality issue in recent years, the proposition that by 2028-29 the Borough will be able to achieve an average delivery of 720 homes per annum is not credible. There is certainly no evidence to support the major hike in delivery rates from 300 per annum in the first couple of years through to 545 between 2024/25 and 2027/28. This point is made irrespective of the debate that has already taken place on the appropriateness of having a stepped housing trajectory.
- 2.31 The sites proposed to come forward later in the Plan period will not be capable of delivering these significant numbers. A greater spread of sites which can realistically meet the housing figures during the Plan period needs to be considered.

Question 9 – Would the Council be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the plan period?

- 2.32 Quite simply, no. At present the Council cannot demonstrate a 5-year housing land supply as demonstrated by several recent appeal decisions including Land East of Crofton Cemetery and West of Peak Lane, Stubbington, Fareham, PO14 2TF (Ref: APP/A1720/W/21/3275237) which stated that Fareham's housing land supply is currently between 3.17 and 3.57 years. Furthermore, on another appeal, Fareham Borough Council and the appellant agreed that the housing supply lies in the range of 0.95 to 3.57 years in the appeal decision for Land East of Newgate Lane East (APP/J1725/W/20/3265860).
- 2.33 In order to achieve a five-year supply of deliverable sites on the adoption of the Local Plan, the Council would need to front load the housing trajectory and plan to deliver a significant number of homes in the first year or two of the plan period. However, Policy H1 of the Local Plan proposes a stepped housing trajectory with the bulk of homes being delivered in the latter years of the plan due to the expectation that the majority of housing sites are large and complex and a significant number of homes coming from the Welborne site. This matter has been discussed earlier in the Examination process.

- 2.34 In addition, a 20% buffer should be added to the housing provision to boost housing as the Council has a record of significant under delivery, not the currently proposed 11% contingency. Given the consistent under delivery of housing, it is considered that rather than adopting a phased approach to housing delivery, the Council should seek to facilitate and promote delivery early in the plan period to boost and maintain a five-year housing land supply.
- 2.35 Further, Table 4.1 of the Local Plan sets out that the total housing requirement over the plan period is 9,556 homes which equates to a requirement of 597 homes per annum. If the 20% buffer is applied, this would increase the housing requirement to 717 homes per annum. As such, on adoption, the Local Plan should demonstrate a supply of 3,585 homes. However, Policy H1 of the Revised Local Plan currently only proposes to allocate approximately 2,235 homes between 2022 and 2027, including windfall sites. Therefore, if the Local Plan were to be adopted in its current form with its current proposed housing provision, regardless of whether the housing provision is stepped or not, it would not be in accordance with Paragraph 74 of the NPPF as there would be a deficit of around 1,350 dwellings which would be required to demonstrate a five-year housing land supply. It should be noted that these housing figures do not take into account the ever-increasing unmet need arising from the sub region which was discussed in detail in Matter 3 of this examination.
- 2.36 The reliance on the stepped housing trajectory which proposes increased delivery rates in the latter years of the plan period fails to respond positively to the evidence of significant need pressures now both from Fareham itself and the neighbouring authorities. It not only runs the risk that the overall housing requirement will not be achieved should there be obstacles to delivery, particularly when reliance is placed on such large sites, it is highly likely that even when the Local Plan is adopted, the Council will not be able to demonstrate a 5-year supply of deliverable sites until later on in the plan period. It is considered that a rolling 5-year housing land supply would also not be achievable with the current allocations in the plan due to some of these being large, complex and greenfield sites which will not deliver the homes required now never mind addressing the current backlog of homes required.
- 2.37 In light of the above, the Local Plan should be taking a more proactive approach to allocate suitable, achievable sites to positively plan for a consistent supply of homes. As such, the Local Plan should provide a range of sites which can deliver in the short, medium and long

term to ensure a consistent 5-year housing land supply throughout the plan period. At present it is considered that the Local Plan does not allocate a sufficient number of homes in the short term to be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the plan period.

Question 10 – Is there a need for and are there any additional sites which could contribute to the first 5 years’ supply post adoption should delivery of any of the allocated sites stall in the first 5 years?

- 2.38 The answer to this is ‘YES’ to both parts of the question.
- 2.39 In respect of the first part, is there a need for any more sites to be allocated to assist in the first five years supply of housing, it is imperative that a greater supply of sites is provided to ensure that the Council can catch up on its under supply in recent years and then meet its 5-year housing land supply going forward.
- 2.40 In terms of whether there are additional sites that could come forward, the answer is again a resounding ‘YES.’
- 2.41 Rookery Farm has been previously identified as a suitable site for allocation and was consulted upon as an allocation in the January 2020 Supplement for approximately 150 residential units. When the Council sought to take ‘advantage’ of the potentially lower housing figures in the DRAFT Standard Method set out in the Changes to the Current Planning System in the Government’s White Paper, in its first Regulation 19 Publication (Autumn 2020), the allocation was dropped. The site was not re-instated in the revised Regulation 19 Plan, despite being a sustainably located brownfield site, whereas the Council has introduced and sought to rely on a range of greenfield sites with environmental and technical issues.
- 2.42 The reasons why the Rookery Farm site should be allocated are set out in detail in our earlier representations (December 2020 and July 2021) and can be summarised here:
- The site is previously developed land/brownfield and its development will reduce the need for more sensitive (greenfield) sites within the Borough;

- The site is in a highly sustainable location in proximity to a railway station and amenities, is deliverable and would provide necessary housing capacity within the Plan period;
- It should be noted that in its response to the draft 2020 Plan (Regulation 18 Draft Local Plan 2036 Supplement) showing the inclusion of Rookery Farm, the County Council responded as follows:

This allocation is close to Swanwick railway station. The County Council supports the opportunity for this site to provide high quality walking and cycling routes to Swanwick station. This may include a new active modes bridge over the motorway and enhanced interchange at Swanwick Station with new local bus services. The development brief also needs to include provision for off-site improvements to address the inadequate bus, walking and cycling connections to the Segensworth business parks.

- Provision of Public Open Space on a former land raise site and access to it from existing footpath routes;
- Removal of a 'heavy industry' use from an otherwise residential setting;
- Opens up pedestrian links across the motorway to Addison Road;
- The site would not be visually prominent and would form a logical urban extension.
- Development could enable biodiversity enhancements associated with long-term habitat management plans and the re-instatement of a pre-existing stream across the site;
- The development would be offset by the loss of 240 HGV vehicle movements a day.

2.43 This site is promoted as a deliverable site in terms of the Glossary to the NPPF. Whilst it does not yet benefit from planning permission it is available now, it offers a suitable location for development now and there is a realistic prospect that housing can be delivered on the site within 5 years (and therefore achievable).

2.44 A planning application is currently under preparation following a pre-application meeting with Fareham Borough Council in late 2021. Following a full range of high level surveys and reports a screening opinion regarding the requirement for an Environmental Statement was submitted to the Council on 16 February 2022 (copy enclosed) and a response is due shortly.

2.45 A pre-application submission to Hampshire County Council Highways has also been submitted. The application is programmed for submission in Summer 2022.

- 2.46 It is therefore with confidence that the answer to whether there are additional sites that could come forward to contribute to the first 5 years supply post adoption is 'YES'

Question 11 – If I were to conclude that a 5 year supply of specific, deliverable housing sites would not exist on adoption, what would be the most appropriate way forward for the plan?

- 2.47 The Inspector has made clear at paragraphs 35 – 38 of her Examination Guidance Note (INSP003) her approach to the Consideration of Alternative Sites not in the Submission Local Plan.
- 2.48 It is anticipated that the Inspector will find for a number of reasons that the housing policies relating to overall numbers and supply are NOT sound and that further revisions, including additional sites are required.
- 2.49 Whether the Plan requires modification or more fundamental reconsideration will determine the way forward. In the event that the Inspector agrees that the Council has not met its housing requirements in absolute terms and/or that there is not a five year supply of specific deliverable housing sites, but that a modification of the Plan would be an appropriate way forward, the approach set out in the Inspector's Examination Guidance Note is considered appropriate. It would be, with clear guidance from the Inspector on the issues and matters that require further consideration, be appropriate for the Council to reconsider those elements, which would be likely to include a fundamental review of the housing figures as well as the provision of additional sites, and to take them through consultation and back to Examination.
- 2.50 With regards to proceeding to adoption followed by an early review which has been mentioned as a possibility during the examination so far, whilst paragraph 33 of the NPPF does allow for this, we consider that there are too many fundamental flaws with the plan as currently drafted. Therefore, the adoption of an unsound plan followed by an early review would not be the correct way forward.

Appendix 1 – Rookery Farm EIA Screening Opinion Request

**Rookery Farm, Botley Road,
Swanwick**

**Environmental Impact
Assessment Screening
Opinion Request**

**Alice Drew
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Client: Raymond Brown Rookery Properties

Date: February 2022

Ref: F-376-2-LE

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<u>Contents:</u>	Page
1.0 INTRODUCTION	1
2.0 THE SITE AND ITS SURROUNDS.....	3
The Site.....	3
Its Surrounds	4
Identified Key Potential Receptors	4
4.0 REQUIREMENT FOR AN EIA	8
5.0 ASSESSMENT OF THE POTENTIAL IMPACTS	10
6.0 OUTLINE PLANNING APPLICATION CONTENT.....	17
7.0 CONCLUSIONS	18

APPENDICES

- Appendix 1 – Site Location Plan
- Appendix 2 - Preliminary Ecological Assessment prepared by Kingfisher Ltd
- Appendix 3 – Highways Technical Note prepared by Paul Basham Associates
- Appendix 4 – Preliminary Noise Impact Review prepared by 24 Acoustics
- Appendix 5 – Preliminary Landscape Statement prepared by WH Landscape
- Appendix 6 – Drainage Technical Note prepared by Paul Basham Associates
- Appendix 7 – Air Quality Preliminary Assessment prepared by AQassessments
- Appendix 8 – Phase I Environmental Site Assessment
- Appendix 9 – Phase II Geo-environmental Site Assessment
- Appendix 10 – Archaeological Desk Based Assessment



1.0 Introduction

- 1.1 This Environmental Impact Assessment (EIA) Screening Request has been prepared on behalf of Raymond Brown Rookery Properties and relates to the proposed development at Rookery Farm, Botley Road, Swanwick.
- 1.2 The site is located to the south-western edge of Swanwick between the settlement and the M27 motorway corridor, to the west of the A3051 Botley Road, on land formerly used as an aggregate recycling facility. Please see the site location plan which details the extent of the site.
- 1.3 The overall site area is 18.3ha. The proposed development area extends to approximately 5ha.
- 1.4 The proposed development comprises the following:
- Up to 150 new residential dwellings (including a policy compliant level of affordable housing);
 - A circa 60 bed care home; and
 - A potential retail/Class E unit .
- 1.5 This report accompanies a request to Fareham Borough Council (FBC) for an EIA Screening Opinion to ascertain if an EIA is required under the provisions of Regulation 6 the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (hereinafter referred to as the Regulations).
- 1.6 In accordance with Regulation 6(2) of the EIA Regulations, this screening request is accompanied by:
- a) a plan sufficient to identify the Site (Please see enclosed Site Location Plan – reference RAYM211015 SLP-01);
 - b) a description of the development, including in particular:
 - i. a description of the physical characteristics of the development, and



- ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected
- c) a description of the aspects of the environment likely to be significantly affected by the development;
- d) to the extent that the information is available, a description of the likely significant effects of the proposed development on the environment resulting from:
 - i. the expected residues and emissions and the production of waste, where relevant, and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity
- e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.



2.0 The Site and its Surrounds

The Site

- 2.1 The site subject of this EIA Screening Opinion Request is located to the south-west of Swanwick, between the existing settlement and the M27.
- 2.2 The north-western section of the site was, until late 2019, in active use as an aggregate recycling facility and is still occupied by structures associated with this use. This section of the site is almost in a 'basin' due to the bunded perimeter and change in topography arising from historic land raising across the wider site. The topography of this part of the site is largely flat with the exception of several aggregate mounds which remain following the recycling use becoming inactive. This section of the site is where the main section of the development is proposed. The care home and potential retail/Class E unit will be located by the main access to the site adjoining Botley Road.
- 2.3 The south and south eastern section of the site which abuts the M27 is a restored landfill site which is maintained regularly. No development is proposed in this section of the site.
- 2.4 The eastern part of the site formerly hosted the site weighbridge, offices and welfare cabins and some of the structures currently remain.
- 2.5 The site extends to approximately 18.3ha. The proposed developable area extends to approximately 5ha.
- 2.6 The site largely comprises previously developed land in the form of made ground, unsealed surfaces and redundant above and below ground structures as well as areas of modified grassland, mixed deciduous woodland, wet woodland, dense mixed scrub with scattered trees, bramble scrub, buddleia scrub, and tall ruderal vegetation. There are four ponds on the site. There are no formal landscape designations within or immediately adjacent to the site. There are no trees subject to TPO's on the site.
- 2.7 The extant planning permission for the site (P/18/0978/CC) permits earthworks to amend the existing topography, including reducing the gradient of the internal access road and creating



a new screening bank in the western corner which extends from the toe of the landfill mass around to the north western corner. These earthworks have not yet taken place.

Its Surrounds

- 2.8 Immediately to the north of the site is an area of remnant orchard and beyond which is the settlement of Swanwick. To the east of the site beyond Botley Road is residential development which comprises Whiteley. To the south of the site is the M27 and to the west is an area of woodland, a car sales and a secure children's home. Swanwick Railway Station is located beyond the M27 to the south east of the site.

Identified Key Potential Receptors

- 2.9 Several preliminary technical reports have been undertaken and support this EIA screening opinion request. Such technical reports have identified the following key potential receptors. The key technical considerations will be assessed in more detail in Section 5 of this Statement.

Residential

- 2.10 There are several properties near the site, however most are located a good distance away or are intercepted by a road. The nearest dwelling is Rookery Farmhouse and a former granary building and barn associated with this which is located beyond an area of vegetation to the north-east of the site.

Heritage Assets and Archaeology

- 2.11 There are few designated heritage assets located within 1km of the site, with a few Grade II listed buildings within the settlements of Swanwick and Glen Ho, to the north and north west respectively, and in Sarisbury beyond the motorway to the south west. The closest heritage asset is Rookery Farmhouse and a former granary building and associated barn, a Grade II listed building.
- 2.12 The site is not located within or near to a Conservation Area.



2.13 Given the site's history the preliminary findings suggest that there is limited potential for any archaeological remains on the site.

Ecology

2.14 The following designated wildlife sites are within a 1km radius of the site:

- Lower Swanwick Woodlands (SINC)
- Coldeast Hospital Pond (SINC)
- Swanwick Nature Reserve (SINC)
- Whiteley Row (SINC)
- Gull Coppice (SINC)
- Bushy Land (SINC)
- Gull Coppice (SINC)
- Whiteley Meadow (SINC)

2.15 There are no ecological designations on the site itself.

2.16 The Preliminary Ecological Appraisal submitted with this EIA screening opinion request identified the potential for protected species to be on parts of the site, however further survey work will be required to confirm the presence of any protected species.

Noise

2.17 The site is located in close proximity to the M27 and therefore is subject to noise from road traffic using the motorway.

Air Quality

2.18 There are two Air Quality Management Areas (AQMA) near the site. The AQMA in Fareham Borough is approximately 7km from the site is unlikely to be affected by the proposed development. The second AQMA is in the neighbouring Borough, Eastleigh, at the

Windhover Roundabout and along the A3025 and A27, and traffic from the proposed development may affect this area.

Landscape and Visual

- 2.19 There are no formal landscape designations within or immediately adjacent to the site. Other than Gull Coppice Local Nature Reserve (LNR), which lies to the east of Swanwick, there are no areas of nature conservation value within the site or its receiving landscape (within 1.0km of the site). However, the site lies within the SSSI Impact Risk Zone for a number of SSSI's.
- 2.20 There are no TPO's located on the site, or close to the site which could be affected by the proposals.

Flood Risk and Drainage

- 2.21 The site lies wholly within Flood Zone 1 and is at very low risk of flooding from all water sources.

Land Contamination

- 2.22 The site is considered to have limited land contamination which would not be of a level which would impact the proposed development of the site. Furthermore, the proposed development has been designed so as to prevent built development conflicting with areas of the site formerly subject to landfilling.



3.0 The Proposed Development

3.1 The proposed development comprises the following:

- Up to 150 new residential dwellings (including a policy compliant level of affordable housing);
- A circa 60 bed care home; and
- A potential retail/Class E unit .

3.2 The proposed development would be accessed via the existing access off Botley Road which was used to access the aggregate recycling facility. It should be noted that the existing access may be realigned to support a new junction design. The access is currently in the form of a simple bell mouth junction and is gated. This existing access has appropriate visibility splays and would continue to have appropriate visibility splays even if it were to be realigned.

3.3 A secondary access is being explored also off Botley Road to provide a separate access to the care home and retail unit.

3.4 The existing access will be improved as part of the proposals and the potential for a secondary access will be explored in a future Transport Assessment.

3.5 The proposed residential area will be located within the land formerly used as the aggregate recycling facility which is in Flood Zone 1.

3.6 The restored landfill area is proposed to be dedicated as public open space with the potential for biodiversity enhancements and landscaping features to provide a buffer between the proposed development and the motorway.

3.7 The proposed development, as demonstrated in section 5 of this statement, is unlikely to give rise to significant environmental impacts through the use of natural resources, the production of waste or pollution, noise or risk to highway safety.

4.0 **Requirement for an EIA**

4.1 The proposed development does not fall within any of the categories listed under Schedule 1 of the Regulations. However, the proposed development falls under the following description in Schedule 2, 10(b) Urban development projects of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

(a) any part of that development is to be carried out in a sensitive area; or

(b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;”

4.2 The thresholds for such development are as follows:

- i. the development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- ii. the development includes more than 150 dwellinghouses; or*
- iii. the area of the development exceeds 5 hectares.*

4.3 If a proposal exceeds these thresholds it does not mean that an EIA is automatically required. Instead, in the context of Schedule 2 development, the Regulations define EIA development as:

“...development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.” (Emphasis added)

4.4 Paragraph: 017 Reference ID: 4-017-20170728 of the Planning Practice Guidance (PPG) sets out: *“If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as ‘exclusion thresholds and criteria’) the proposal needs to be screened by the local planning authority to determine whether significant effects on the*



environment are likely and hence whether an Environmental Impact Assessment is required. Projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria.”

- 4.5 Paragraph: 018 Reference ID: 4-018-20170728 adds that “*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*”.
- 4.6 The Proposed Development is not located within a sensitive area (for example Site of Special Scientific Interest, National Park, scheduled monument etc.) but it is within the SSSI impact risk zone for a number of SSSI's.
- 4.7 As the proposed development proposes up to 150 dwellings and a circa 60 bed care home and the overall area of the site is 18.3 ha with the development area being approximately 5 hectares, it is required to be screened to identify the requirement for an EIA.



5.0 **Assessment of the Potential Impacts**

- 5.1 The proposed development may result in some environmental impacts; however, any such impacts will be addressed through the supporting technical reports which will accompany a subsequent outline planning application. Several high-level technical reports have been undertaken to inform and are submitted in support of this EIA screening opinion request. These technical reports consider that the potential impact on the general amenity and character of the surrounding area will not be significant. The technical reports have also highlighted that there would be potential for landscape and habitat enhancement as a result of the proposed development.
- 5.2 The following provides an assessment of the proposed scheme against the key technical considerations to enable the Local Planning Authority (in this instance, Fareham Borough Council) to determine whether the proposed scheme should be the subject of an Environmental Impact Assessment (EIA).

Highways

- 5.3 A Highways Technical Note has been prepared and has been submitted in support of this EIA screening opinion request as well as submission to Hampshire County Council for Highways Pre-application advice.
- 5.4 The proposals would utilise the current, main vehicular access, which may be realigned to support a new junction design, and potentially an additional access would be provided approximately 120m to the north of the existing access to facilitate an alternative access to the proposed care home and retail unit. Section 4 of the Highways Technical Note confirms that both the existing and proposed accesses will provide suitable access and egress in accordance with the relevant requirements.
- 5.5 In addition to the new vehicular access arrangements, the proposed development would also look to include pedestrian crossing points at the junctions, as well as enhanced footway provision along the site frontage.



- 5.6 Section 3 of the Highways Technical Note looks at traffic generation resulting from the proposed development compared to the former use of the site as an aggregate recycling facility. It is confirmed that the proposed development could generate an additional 73 to 77 two-way vehicle movements during the AM and PM peak hours respectively. It sets out that no more than 1-2 of the proposed daily movements would be HGV's, compared to the average of 240 daily and 25 peak hour HGV movements during the peak hours associated with the permitted use.
- 5.7 It is confirmed in the Highways Technical Note that by virtue of the Site's location, with links to both Swanwick and Whiteley, the site is located within both walking and cycling distance to a range of services and facilities, including employment opportunities. The site is also accessible by public transport with bus services to the surrounding local centres and Fareham. The site is also in close proximity to Swanwick Train Station which provides links to both regional and national destinations. It is therefore considered the site is in a sustainable location(See 2.9 – 2.19 of the Highways Technical Note for further details).
- 5.8 The site is in an accessible location and the proposal would also be supported with off-site contributions, appropriate Section 106 Contributions if required, and a Travel Plan.

Landscape and Visual

- 5.9 A Preliminary Landscape Statement has been undertaken and is submitted in support of this EIA screening opinion request. This statement confirms that there are no formal landscape designations within or immediately adjacent to the site. Other than Gull Coppice Local Nature Reserve (LNR), which lies to the east of Swanwick, there are no areas of nature conservation value within the site or its receiving landscape (within 1.0km of the site). However, the site lies within the SSSI Impact Risk Zone for a number of SSSI's. The statement confirms that the proposed development will have no perceived impact, either direct or indirect, on these designations.
- 5.10 There are no TPO's located on the site, or close to the site which could be affected by the proposals.

- 5.11 The site itself falls within the 'Burrige/Swanwick/Whiteley' Character Area'. The key characteristics of this area are set out in section 3.2 of the Preliminary Landscape Statement.
- 5.12 An initial Landscape and Visual Appraisal of the site has been carried out and this concludes that the site is of a medium landscape quality overall, has a low to medium landscape sensitivity, and does not constitute a 'valued landscape' as set out in paragraph 174 of the NPPF. Section 5 of the Preliminary Landscape Statement sets out the landscape and visual impact of the proposed development. In summary, due to the visually intervening landform within the site boundary, in particular the elevated land in the southern section of the site, and a high degree of visual enclosure provided by existing tree cover both on the perimeter of the site and the surrounding area, the proposed development will be well-screened from the wider area with only a small number of locations from where views of the proposals will be visible.
- 5.13 The Preliminary Landscape Statement highlighted that the proposals create the opportunity to provide landscape mitigation which should focus on ensuring the protection and retention of key habitats identified in the ecological appraisals, protecting and strengthening (where appropriate) boundary vegetation, providing new landscape structure and gains for biodiversity, and providing attractive green infrastructure and landscape enhancements within the proposed development. Through such mitigation, it is considered that the proposals will respect and enhance the surrounding landscape character and will soften the built form in any localised or wider views.
- 5.14 In light of the above, it is considered that the proposed development of the site at Rookery Farm will not result in a significant landscape and visual impact. In fact, through appropriate mitigation the proposed development could conserve and enhance the surrounding landscape.

Ecology

- 5.15 A Preliminary Ecological Appraisal has been undertaken and is submitted together with this screening opinion request. The site is not subject to any ecological designations, section



2.12 of this statement and the Preliminary Ecological Appraisal sets out the designated sites of importance for nature conservation as well as protected species records.

- 5.16 The appraisal identifies that the site consists of a mosaic of habitats including modified grassland, mixed deciduous woodland, wet woodland, dense mixed scrub with scattered trees, bramble scrub, buddleia scrub, previously developed land and tall ruderal vegetation. There are four ponds on the site. A Phase 1 Habitat Map has been produced for the site and is included within the Preliminary Ecological Appraisal.
- 5.17 There are no buildings on site and the u-shaped wall on site has been identified as having negligible potential for roosting bats. The trees on site are also considered to have negligible potential for roosting bats. Some of the habitats on the site itself are considered to offer potential for foraging and commuting bats and as such Phase II surveys are required. Such surveys have also been recommended for breeding birds, reptiles, great crested newts, dormice and invertebrates. Such survey work will be undertaken to support an outline planning application.
- 5.18 Further ecological work will provide recommendations for mitigation and enhancements on site for protected species. In light of the above and the further survey work, it is considered that the proposed development will be able to suitably mitigate and potentially provide enhancements for protected species which would result in a biodiversity net gain on the site. As such, the proposals are not considered to result in significant adverse ecological impacts.

Heritage and Archaeology

- 5.19 An Archaeological Desk Based Report has been undertaken and is submitted in support of this EIA screening opinion request. The report confirms that there are no known heritage assets on the site. It does however suggest that there is a low possibility of some visual interaction between the site and Rookery Farmhouse and Yew Tree Villa listed buildings. As such, any proposed development would need to be sympathetic to the setting of these heritage assets as required by Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 which states:



“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 5.20 The report concludes that archaeologically, the area appears not to be rich in historical remain, however this could be due to the lack of opportunity for archaeological investigation. It also highlights that the landfill development may already have compromised any archaeological deposits present on the site. It may be necessary to provide further information about the potential of the site from field observation in order to draw up a scheme to mitigate any potential impact. Appropriate archaeological investigation work will be carried out as part of a planning application to identify and protect (as appropriate) any archaeological assets that may be present on the Site.
- 5.21 The outline planning application will identify any potential impacts of the proposed development on the significance of the identified heritage assets and their settings, particularly through further landscape assessments, and will be sensitively master planned to ensure there is no, or a very limited impact on such heritage assets.
- 5.22 Our preliminary analysis indicates that the proposals are not considered to have a significant impact on neighbouring heritage assets or archaeological remains.

Flood Risk and Drainage

- 5.23 The high-level Drainage Technical Note submitted with this EIA screening opinion request confirms that the site lies wholly within Flood Zone 1 and is at very low risk of flooding from all water sources. However, land lying to the north of the site and at the site access is at risk of flooding.
- 5.24 The nearest significant watercourse is the River Hamble located 1.7km away to the north-west of the site and does not pose a flood risk to the proposed development site.



- 5.25 Initial work identifies the site being underlain by chalk, and it is therefore likely that infiltration techniques will not be suitable at this location. However, further investigative work and infiltration testing will confirm this.
- 5.26 The drainage technical note has set out that it is likely a drainage strategy for the proposals will form a piped network draining with attenuation devices and discharge into an existing water course if suitable, or the nearest surface water sewer subject to a Section 106 (Water Industry Act 1991) with Southern Water.
- 5.27 In light of the above, it is considered that the proposed development will not result in any significant flood risk impacts.

Noise

- 5.28 A Preliminary Noise Impact Assessment has been undertaken and is submitted in support of this screening opinion request. It is acknowledged that the site is subject to noise from road traffic on the M27 motorway which is located to the south of the site. It is pertinent to note that the extant permission for the aggregate recycling facility included a bund which would 'plug' the gap along the boundary with the motorway. This bund would be constructed and has been taken into account in the Preliminary Noise Impact Assessment.
- 5.29 The Preliminary Noise Impact Assessment concludes that for internal noise, outline recommendations in terms of glazing and ventilation have been provided to ensure that noise within habitable rooms, due to road traffic, would comply with maximum internal levels at both day time and night time. It also confirms that noise levels in external amenity areas will be below the required standard for the majority of the site with amenity noise levels elsewhere mitigated and reduced to a minimum through provision of suitable garden fences. Therefore, it is considered that an appropriate acoustic environment can be provided to the proposed residential properties, both externally and internally and the proposed development will not result in any significant noise impacts.



Air Quality

- 5.30 An Air Quality Preliminary Assessment has been undertaken to assess the potential impact of the proposed development on the nearby Air Quality Management Areas.
- 5.31 The preliminary assessment has concluded that monitoring undertaken by Fareham Borough Council indicates that local air quality is good and that there are no exceedances of the air quality objectives. However, traffic generated by the proposed development may travel through an AQMA declared by Eastleigh Borough Council.
- 5.32 It is highlighted that there is the potential for dust to be created in the construction phase and therefore it will be necessary to undertake a construction dust risk assessment to determine the level of mitigation required during the construction phase.
- 5.33 The potential air quality impacts will be assessed further as part of an outline application and appropriate mitigation will be recommended if adverse effects on air quality are predicted. The proposed development is therefore unlikely to result in any significant adverse impact on air quality.

Land Contamination

- 5.34 A Phase I Environmental Site Assessment and a Phase II Geo-environmental Site Assessment have been undertaken and are submitted with this EIA screening opinion request. The Phase I assessment recommended further survey work, hence the Phase II assessment. The assessment concluded that the site is generally low risk with respect to contaminated land liability. The assessment also set out that the data does not indicate that the site poses a significant risk to the proposed development. Further survey work will be undertaken to inform an outline planning application; however, the preliminary findings suggest that the proposed development of the site is unlikely to result in any significant land contamination issues. Any further work could be conditioned as part of the outline planning application.



6.0 **Outline Planning Application Content**

6.1 It is envisaged that the following reports will be submitted in support of an outline planning application for the Proposed Development:

- Planning Statement;
- Design and Access Statement;
- Statement of Community Involvement;
- Transport Assessment (including a Framework Travel Plan);
- Tree Survey;
- Flood Risk Assessment (including foul and surface drainage assessment);
- Utilities Assessment;
- Noise Assessment;
- Land Stability Report;
- Biodiversity Report including Biodiversity Net Gain Assessment;
- Nutrient Neutrality Assessment;
- Air Quality Assessment;
- Ground Conditions Assessment;
- Heritage Statement;
- Archaeological Desk-Based Assessment and
- Landscape and Visual Impact Assessment.

6.2 These reports will provide a thorough assessment of the relevant technical matters to demonstrate the acceptability of the Proposed Development against the relevant planning policies and material considerations.

7.0 **Conclusions**

- 7.1 In light of the analysis above, it is considered that the proposed development at Rookery Farm, Botley Road is not likely to have significant effects on the environment by virtue of factors such as the development's nature, size and location.
- 7.2 Whilst it is acknowledged that some identified receptors will experience a change as a result of the proposed development, no significant environmental effects will be experienced either during the short construction phase or during occupation of the development. In any event, it is considered that any effects are likely to be localised and can be adequately mitigated, as demonstrated in the high-level technical reports which are submitted as part of this EIA Screening Opinion Request. Mitigation can be appropriately secured through imposition of suitable conditions and/or planning obligations.
- 7.3 All of the technical reports submitted with this report have considered any impacts as a result of the proposed development and appropriate mitigation will be provided to ensure no residual significant effects.
- 7.4 The above assessment, together with the technical reports, conclude that undertaking an EIA is not required for the proposed development. Therefore, we request a formal EIA screening opinion from Fareham Borough Council as the relevant planning authorities under Regulation 6(1) of the EIA Regulations to confirm that an EIA is not required for the proposed development.