



**FAREHAM BOROUGH COUNCIL**

**LPP2: DEVELOPMENT SITES & POLICIES PLAN EXAMINATION**

**RESPONSE TO**

**DCD-28 List of actions arising from the Hearing Sessions**

**Prepared By:**

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**On Behalf of**

<b>DREP394</b>	<b>Mr William Tracy</b>
<b>DREP398</b>	<b>Mr S Figgis</b>
<b>DREP406</b>	<b>Mr &amp; Mrs J Roughton-Bentley</b>
<b>DREP407</b>	<b>Persimmon Homes PLC</b>
<b>DREP408</b>	<b>Mr S Dunleavy</b>

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## Issue 2

### **1. Council to explain the suitability of the methodology of the Fareham Borough Gap Review (DNE05)**

The explanatory appendix provided by David Hare Landscape focuses on the justification for the proposed exclusions from the former Strategic Gap areas i.e. land west of the Meon valley. This is a broad approach which does not look at the detailed evaluation of the existing boundaries.

It is acknowledged that Strategic Gaps will inevitably include areas of development, however the boundaries equate to the existing urban settlement boundaries. There has been no review of these boundaries either in terms of the definition of the urban settlement boundary or in terms of the strategic gaps. This leads to a perpetuation of the status quo and fails to have met the requirements of the Core Strategy for a comprehensive review.

The most obvious case is that of Southampton Hill, Titchfield where the boundary currently passes through the front door of the former office block formerly occupied by Mitie. The land has been included in the Gap which makes no contribution to its function. A similar situation exists at Crofton Manor (DREP406).

## Issue 3

### **1. Council to consider criteria based policy for frontage infill outside of settlement boundaries.**

The introduction of the provision of frontage infilling within Policy DSP7 is supported.

## Issue 7

### **3. Council to explain the relationship between housing at Welborne and the rest of the Borough**

The Council has admitted that there is a shortfall with regard to Welborne (LPP3). However it continues to argue that this is a sub-regional SDA and, therefore, that this can be “ring fenced”. If this is the correct position then the shortfall should have been referred back to the sub-regional umbrella PUSH for re-distribution (as required by the Inspector in his Report on the core Strategy). There is no evidence that the Council has undertaken this in the formal



requirements of the Duty to Co-operate. This is a legal requirement and, if it has not been undertaken the Local Plan must be unsound and not legally compliant.

It is evident that if the Council had consulted PUSH or any of the adjoining districts the answer would have been that they have no capacity to contribute to the shortfall. It is known for example that the Eastleigh Borough Plan has been suspended because it cannot meet its housing requirements and clearly cannot contribute to any shortfall. Many of the other Districts have adopted Core Strategies/Local Plans and are not in a position to contribute to the shortfall.

Alternatively as advocated by many objectors the shortfall should be resolved by bringing forward sites in the remainder of the Borough with immediate effect. It is considered that the shortfall is approximately 3000 units. The figure can be calculated on the simple basis of the proposed trajectory to 2026 (2860 dwellings) as against the figure in the South Hampshire Strategy of 5400 dwellings. In addition, there is the short-term shortfall caused by the delay in the commencement of development at Welborne.

There is no need to await the Review of the Core strategy which is unlikely to be available for several years and this will undoubtedly delay the resolution of the shortfall significantly.

The latest position as set out by the Council indicates that the early review by PUSH will be completed by 2016. However it is noted that this is simply the start of the consultation on the revised Core Strategy and this is expected to take until 2018 to have an adopted plan. This is 3.5 years subject to no further delays in the Plan preparation. Thus the shortfall plus the objectively assessed need would not be addressed until this process is completed.

#### **4. Council to set out their approach to increasing flexibility through the rewording of Policy DSP40**

The Council has now acknowledged that it should make provisions within the plan in the event that a shortfall could occur. Whilst this is welcomed it does seem that the provisions of the plan amount to no more than is provided for in the NPPF. In the event of a failure to provide a five year land supply then sustainable sites may be appropriate for development if there are no other material considerations which indicate the site is unsuitable. This is not the proper way to provide new sites as it does not amount to plan-led development. How are the sites to be assessed? This approach will lead to speculative developments assessed on appeal on an ad hoc basis.

## **6. Council to set out Council's approach to ensure that sufficient affordable housing is delivered within the Borough**

The Council has acknowledged a shortfall in affordable housing in paragraph 6.4. This does not take into account the acknowledged shortfall in Welborne. Its proposal to resolve this issue is to put forward a policy to allow exception sites in appropriate locations. This policy is unworkable. The requirement is that only sites which adjoin existing settlement boundaries would be appropriate. It is difficult to believe that any landowners with sites adjacent to the urban boundary would put forward such proposals when it is quite clear that these same sites have a considerable hope value given the identified shortfall whether it is resolved immediately or as part of the early review. This is particularly pertinent in review of the proposed amendment to Policy DSP40 to allow for release of additional land adjoining the settlement boundary.

The solution would be to make allocations for market housing with the appropriate proportion of affordable housing.

## **10. Council to re-consider approach to self-build and the wording of paragraph 5.181**

The Council has put forward two solutions for the provision of more self-build in the Borough. Curiously, given the Council's proposal to ring fence Welborne, the Council has referred to the provision of 60 units in the LPP3. However these are spread over a 20 year period which would provide an average of 3 per annum. These are unlikely to be provided in the short term as the necessary infrastructure will not be available and housing proposals for market housing will be given priority.

For LP2 there are new proposals for sites in particular H12 (Sea Lane) and H13 (Stubbington). This is the first time that these sites have been mentioned in the context of self-build and the Council has simply stated that self-build will be given "encouragement". There is no indication that the promoters of these sites support the concept. It is noted that both sites are beneath the threshold of 10 units where it is unlikely that affordable housing will be included. In order to provide self-build plots it is necessary to provide the requisite infrastructure. It seems probable that market housing will be preferred on these sites.

## Issue 8

### 1. Council to set out how LPP2 meets the needs for older people

The Council has failed to recognise the magnitude of the increasing ageing population that it is facing. In simple terms it is the projected growth in the over 85 year olds that will create the greatest demands on housing, social services and the NHS.

It is accepted that most people state that they prefer to remain in their homes. This position is rejected (para 8.2) A report by the Institute of Public Care noted that:- “There is evidently a shortage of alternative housing for the elderly. The Ageing Alliance reported that 90% live in mainstream housing. “The simplistic view of older people’s housing preferences is that all older people wish to remain in their traditional family home. **However, the research suggests this is as much a reflection about what is available and the difficulty of moving, as about a genuine desire to stay put**” (Identifying the health gain from retirement housing: Institute of Public Care: June 2012).”

However most of the over 85s suffer from life limiting illnesses. They also lose the support of partners. Their homes need adaptation if they are to remain in the same house e.g. installation of Stannah lifts, removal of baths and replacement with walk-in showers. Accessibility in wheelchairs is often impossible in much of the existing housing stock.

There is an urgent requirement to provide housing that not only meets these physical requirements but also provides support close-by in the form of nursing care and other support services in order to ensure that the need to move into a care home is delayed as long as possible.

The Council’s proposals include the identification of three sites. None of these is very suitable for elderly persons. The site in Portchester (H20) lies on a roundabout. It has difficult access. The site has been available for at least 35 years and its viability must be questionable. The site is only proposed for 15 units and it is difficult to envisage how any support services can be provided in association with such a low number of units.

The site at Fareham Station West (H16) is also unattractive as a setting for the elderly. 80 units are proposed on a site that adjoins the railway station and access is proposed through the station forecourt.

The site in Locks Heath at the Genesis Centre (H17). It proposes 35 flats on a site that displaces a youth facility.



In total these sites make a minimal contribution towards the rapidly rising demand and are probably only suitable for use as “extra care” facilities. There is also a question of viability. Are the sites large enough to create enough units to support the necessary services?

The proposed Policy DSP42 provides that if the sites are not viable then other uses may be considered. If this proves to be the case there is no other mechanism to provide land for such specialist accommodation.