

Introduction:

This note is a response to the Council's Actions arising from the Hearing Sessions relating to Issue 7 in document DCD-24: Housing Allocations including alternative sites for consideration (DSP40).

It is on behalf of Sustainable Land PLC and the Hammond Family who have interests in land east of Newgate Lane and north of Gosport Road, Fareham. The potential for sustainable residential development in this area has been promoted through successive stages of Fareham Borough Council's Core Strategy and Development Sites and Policies Plan. The case for residential development east of Newgate Lane has been reinforced by Hampshire Council's confirmation of their preferred route for the re-alignment of Newgate Lane, which will fragment agricultural land holdings, and by further evidence of future housing requirements in the South Hampshire Strategic Housing Market Assessment (SHMA) of January 2014.

There are related statements on Issue 2 (The Existing Settlements, DCD-20), Issue 9 (Facilities and Infrastructure, DCD-26) and Issue 10 (Delivery and Monitoring DCD-27).

Our comments on Issue 7 relate to points 2, 3, 4, and 6 in DCD-24.

2. Council to explain the content of the 2014 PUSH SHMA, the weight that has been attached to it and the implications for LP2

This explanation adds little to the evidence of the Council at the hearings on their approach to the 2014 SHMA, although it does refer to the proposed modification of paragraph 1.1 of the plan to include an explicit commitment to review of the plan following the South Hampshire Strategy Review, which is welcome.

We do not agree that it is necessary to await completion of the South Hampshire Strategy Review to address the evident gap between objectively assessed housing needs and housing provision in the Development Sites and Policies Plan, including the implications of reductions in the assessment of housing capacity for Welborne. These matters were discussed in the hearings. There is an inconsistency between the commitment to an early review and the attempt to confirm settlement boundaries and the Strategic Gap, which should be defined for the long term, but will need to be re-considered in conjunction with an early review of housing provision. Indeed there is a

real concern that the Strategic Gap and settlement boundaries will become policy constraints that prevent accommodation of any additional housing apportionment in the South Hampshire Strategy Review.

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

The Council's response re-iterates some of what they said at the hearings. Their approach was challenged by a number of participants on the basis that some provision in Fareham was clearly appropriate to compensate for the reduction in capacity at Welborne, as the Borough contributes part of the sub-regional requirement and will inevitably be affected by a reduction in housing provision at Welborne.

Although the Core Strategy Inspector concluded that a sub-regional approach should be taken to addressing the implications of reductions in capacity at Welborne, that was in 2011 and the Council's statement on the South Hampshire Strategy indicates that it will not be adopted before 2016 and any re-apportionment will not be incorporated in a Local Plan Review before 2018. In view of this delay, a contingency should be provided in the Fareham Development Sites and Policies Plan through greater flexibility in the plan's housing provision.

The Council's response does not refer to a statement made at the hearings that it would be relying on all housing completions in Welborne for the first three years as part of the Borough's five-year housing land supply. That approach to housing supply at Welborne would be inconsistent with the Council's approach to reductions in housing capacity at Welborne.

4 Council to set out their approach to increasing flexibility through the re-wording of Policy DSP40

The proposed modifications to the wording of Policy DSP40 and paragraph 5.180 are a welcome recognition of the need for '*sufficient flexibility to adapt to rapid change*' (as required by the NPPF), but in practice they will add nothing to the policy approach to five-year housing land supply in paragraphs 14 and 49 of the NPPF.

Additional flexibility will only come from increased provision for housing and a more flexible approach to settlement boundaries and the Strategic Gap, including the allocation of land east of Newlands Lane which should be added to the Proposals Map

and to the list of sites set out in Appendix C, Table 8, as indicated in our evidence at the hearings.

6 Council to set out the Council’s approach to ensure that sufficient affordable housing is delivered within the Borough

The Council acknowledges that the plan’s focus on development within the existing urban areas will limit the scope to secure affordable housing through planning obligations because of site development costs and viability. These issues were discussed at the hearings and the Council appears to be discounting the viability assessments of sites undertaken by Knight Frank (DHO10).

The proposed modifications to include a new policy DSP7 for exception sites outside the urban boundaries, for up to 20 affordable dwellings, is a welcome recognition of the problem of delivering affordable housing, but there is no evidence that this approach is financially viable and that any sites would come forward. A modest allocation of market housing in suitable locations adjoining the existing urban areas, including land east of Newlands Lane, would make a larger and more reliable contribution to making up the expected deficit in affordable housing provision.

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