



Date 5 January 2015

Claire Jones-Hughes
Programme Officer
c/o Banks Solutions
6 Brading Road
Brighton
BN2 3PD

Dear Ms Jones-Hughes

**FAREHAM BC DEVELOPMENT SITES & POLICIES: ACTIONS ARISING FROM HEARINGS
ISSUE 7: HOUSING ALLOCATIONS INCLUDING ALTERNATIVE SITES FOR CONSIDERATION
(DSP40)
WYG FOR COASTAL WATERWATCH LTD
RESPONDENT REF: DREP411**

I refer to the above matter, and confirm that this response provides additional points to those previously submitted through the representations and hearing statement made on the Submission and Publication versions of the Fareham Local Plan Part 2.

Question 1 – Council to confirm with PUSH the timescale for delivery of the review of the South Hampshire Strategy

The South Hampshire Strategy, which is identified by the Council as the vehicle for determining the housing need for the Borough is not anticipated to be completed at the earliest by 2016. This would, in effect create a policy vacuum in the Borough with more and more applications having to go to Appeal (as is the case with The Navigator) to demonstrate that the Council does not have a robust policy position against the out-of-date Core Strategy. This is not a satisfactory position for either landowners/developers or the Council to be in. On this basis, the Local Plan remains unsound, as it is not justified and will not be effective.

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

In its response to the Inspector, the Council acknowledges that the 2014 PUSH Strategic Housing Market Assessment (SHMA) is the most up-to-date evidence on objectively assessed housing needs. In accordance with the National Planning Policy Framework, it is the only basis on which to allocate housing sites. This is because, the difference between the out-of-date Core Strategy figure of 186 dwellings per annum and the 2014 SHMA figure of 395 dwellings per annum figure is so significant as to render the current allocations within the Fareham Local Plan Part 2 inadequate. Therefore, the SHMA should be given greater weight as the "Objectively Assessed Needs" of the Borough compared to the Core Strategy housing targets, which are based on the revoked and out-of-date South East Plan. This approach is advocated in the NPPG (Paragraph ID 3-030-20140306).

It is also worth reiterating our previous point on the Council's early review of the Local Plan. This is not set to be adopted until Spring/Summer 2018, which is circa 7 years from the date of adoption of the current Core Strategy (Local Plan Part 1), and outside of the five years test of soundness under the National Planning Practice Guidance (NPPG).





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

There is nothing new in the Council's response to the Welborne issue and the lack of clarity remains a major omission from the Plan. No explanation for the split of housing at Welborne between the local authorities within PUSH has been given at this stage, or at any other previous stage of the process. Therefore, Fareham Borough Council has clearly failed to comply with the Duty to Co-operate.

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

The proposed new text and rationale for Policy DSP40 put forward by the Council is meaningless. The Council can adequately demonstrate a five-year housing land supply position against the Core Strategy, because the housing numbers are very low and out-of-date at 186 dwellings per annum. This new wording would be contrary to the NPPF and NPPG as the five-year housing land supply position would be based on the out-of-date Fareham Core Strategy, which is taken from the revoked South East Plan, and does not meet the objectively assessed housing needs as set out in the 2014 PUSH SHMA. Therefore, we would direct the Council to allocate more housing sites within the Plan, including the allocation of the land to the rear of 69 Botley Road rather than expand Policy DSP40.

Question 5 – Council to remove additional access points (Green Lane and between 43 and 47 Fleet End Road) into the Fleet End Road housing site (H7) and restrict access to the site via Shorewood Close

As previously stated, we do not believe that Fleet End Road is a deliverable housing allocation given the landownership position. It has not come forward for development since its allocation in the Local Plan Review 2000 and should not be rolled forward in this Plan.

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

The Council's proposed Affordable Housing Exception Sites at Policy DSP7 will do little to address the affordable housing needs in the Borough. The full affordable housing need as set out in the 2014 PUSH SHMA is 296 dwellings per annum (Table 34 of the SHMA), ignoring the Private Rented Sector (PRS), as this is not a recognised source of affordable housing in accordance with the NPPF (Annex 2). The disregarding of PRS from strategic housing market assessments was endorsed in November 2014 by the Inspector at the Eastleigh Borough Local Plan 2011-2029 Examination (please see ID/4: Inspector's Preliminary Conclusions on Housing Needs and Supply and Economic Growth – Post Hearing Note 2) and also by the Inspector at Test Valley Revised Local Plan Examination (IN 009) in December 2014.

By taking the full affordable housing need of 296 per annum over the development plan period, and comparing this to the Council's identified supply of 584 affordable dwellings to 2026 (as at Table 1), this would create a shortfall of 3,856 affordable homes, which is an acute position. The Council's solution of a small number of affordable housing exception sites is not going to fundamentally address this shortfall. Therefore, the only credible source of additional affordable housing over the plan period is an increased number of housing allocations that can deliver affordable homes through s.106 agreements. This provides further evidence for allocating my client's site to the rear of 69 Botley Road.



Question 8 – Council to provide the following information with regards to housing site at Heath Road (H11): Insert potential access points into Site Plan; Confirm capacity of Hampshire County Council owned portion of the site; and provide comments from Council’s Tree Officer regarding delivery of the site in light of TPO coverage

Whilst, we acknowledge that Hampshire County Council is seeking to bring the Heath Road site forward, the timing of the development is still open to question, as to date there has not been any pre-application advice, screening opinions, or public consultation exercises etc. In terms of the marketing, the County Council may also need to dispose of the site through an OJEU procurement process, which may push the timetable out. The Knight Frank Viability Assessment identified the County Council’s land at Heath Road for Years 6-10, and it appears appropriate to use this full timeframe moving forward.

Question 9 – Council to provide further comfort on the delivery of the Town Centre redevelopment sites

The Council’s comments provide no reassurances that housing will be delivered in Fareham town centre, especially on the Civic Area and Market Quay sites, which are allocated for 140 dwellings in total combined. The Knight Frank Viability Assessment was clear in its advice on the Civic Area/Market Quay sites, stating that *"The site is considered to be a long term regeneration project, but the residential component of any scheme should be viewed as a Windfall for the purposes of the site allocations DPD"*. There is no difference between Civic Area and Market Quay and other sites within the town centre where housing numbers are not attributed due to viability issues, such as Fareham Station East and Russell Place. The delivery of the Civic Area/Market Quay regeneration project requires some key strategic re-locations, such as the theatre from its current position at the Civic Area to Market Quay car park to create a new arts centre, which in turn requires the re-provision of car parking from Market Quay. According to the Knight Frank Viability Assessment, the new Arts Centre would cost £8.7m, and land receipts from commercial and residential development would only amount to £2m-£3.3m, which leaves a shortfall of at least £5.4m to find to build the new arts centre. Therefore, currently the scheme is not financially viable, and there is no evidence from the Council to suggest it would be viable in the future. Therefore, the Council should not be relying on the delivery of 140 dwellings from the Civic Area and Market Quay sites, and these numbers should be deleted from the housing trajectory and associated tables in the Plan.

Summary

The Core Strategy is out-of-date, and the Council is not planning positively to deliver the Objectively Assessed Housing Needs in the Borough. The proposed changes to the proposed policies, especially DSP40 and DSP7 will have little impact on housing delivery. The only credible solution to deliver much needed affordable homes, and the private housing needs is to allocate additional housing sites outside of the existing defined urban settlement boundaries. The site at land to the rear of 69 Botley Road should therefore be allocated for housing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CH', with a large, stylized flourish at the end.

Christopher Hemmings
Associate Director
For and on behalf of WYG