



Date 24 October 2014

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

Dear Ms Jones-Hughes

**INDEPENDENT EXAMINATION OF THE FAREHAM LOCAL PLAN PART 2: DEVELOPMENT SITES AND POLICIES PLAN
ISSUE 2: THE EXISTING SETTLEMENTS (DSP2 – DSP6)
WYG FOR PRIVATE LANDOWNER
RESPONDENT REF: DREP399**

I refer to the above matter and confirm that my client wishes to be included in the list of participants for the Hearing Session for Issue 2 of the Independent Examination of the Local Plan Part 2: Development Sites and Policies Plan to take place on 11th November 2014.

I will be representing my client at the Hearing Session.

I set out below our response to the relevant Inspector's 'Issues and Questions' document, September 2014.

I confirm that our previous written submissions relating to the Publication Version of the Local Plan Part 2 remain valid and request that the comments below are read in conjunction with our previous statements.

Question 2.1

The Council's stance as set out at Paragraph 3.9 of the Local Plan Part 2 that it does not need to review the settlement boundaries based on evidence studies is now flawed in light of the publication of the PUSH Strategic Housing Market Assessment, January 2014, that shows the "full, objectively assessed needs for market and affordable housing" in accordance with the NPPF (Paragraph 47). The housing need for Fareham Borough at 395 dwellings per annum is more than double the Core Strategy requirement of 186 dwellings per annum.

As set out in our response to Issue 1, the Core Strategy is out-of-date and there is a clear rationale for allocating housing development sites based on either the Fareham Borough housing need as set out in the PUSH Strategic Housing Market Assessment, January 2014 prepared by GL Hearn, or as an alternative the under-delivery of housing at Welborne. Failure to allocate sites on either of these bases would be contrary to the objectives of the NPPF to boost significantly the supply of housing (Paragraph 47).

The NPPF is clear that local planning authorities need to meet "full, objectively assessed needs for market and affordable housing" and therefore Fareham Borough Council now need to review the Defined Urban Settlement Boundaries to take account of this additional housing need from sustainable sites.





My client's site at Posbrook Lane, Titchfield is a highly sustainable site which is located adjacent to the southern boundary of Titchfield. The site is available for housing development and would form a natural extension to the village.

Housing at Great Posbrooke Farm is located adjacent to the southern boundary of my client's site, and therefore development is proposed that seeks to revise the settlement boundary of the village adjacent to this housing development. My client's site is highly sustainable given its proximity to shops and services in Titchfield, Titchfield Primary School, and wider employment and retail facilities within Fareham town centre.

We therefore recommend that my client's site is allocated for housing and the settlement boundary is redrawn to include my client's site at Posbrook Lane and adjacent housing at Great Posbrooke Farm, as set out below at Appendix 1.

Question 2.2

The publication of the 2014 PUSH SHMA also means that the Council's review of the Strategic Gap boundaries is now flawed and requires a completely fresh approach to allow sustainable sites with a low impact on the Strategic Gap to come forward.

My client's site at Posbrook Lane, Titchfield is located at the southern end of Titchfield, and therefore the impact on the coalescence of Titchfield is considered to be low.

We would therefore recommend that my client's site is removed from the Strategic Gap.

Conclusions

The Local Plan Part 2 is deemed to be unsound in relation to the following:

- Paragraphs 3.1-3.9
- Proposals Map

The Plan fails the key tests of soundness as follows:

- **Positively prepared** – No, because it does not seek to meet “objectively assessed needs for market and affordable housing”, and therefore sites outside of the existing settlement boundaries have not been duly assessed.
- **Justified** – No, because the Council has ignored the latest and only objectively assessed needs assessment of the Borough. In addition, there is an absence of strategy to deal with the under-delivery at Welborne.
- **Effective** – No, because the ring-fencing of Welborne is leading to an under-delivery of housing for Fareham and the sub-region, especially as sites outside of the settlement boundaries are not assessed.
- **Consistent with National Policy** – No, because it seeks to allocate sites based on the housing numbers as set out in South Hampshire Strategy 2012, and this does not reflect “objectively assessed needs” (Paragraph 47 of the NPPF). The Core Strategy housing figures pre-date the NPPF and are out-of-date as the Local Plan Review will not be in place until 2018, 7 years after the adoption of the Core Strategy, and not in accordance with the NPPG. The shortfall in



housing is also not boosting significantly the supply of housing in the Borough and therefore also contrary to the NPPF (Paragraph 47).

The Plan can be made sound, where the Council adopts the SHMA 2014 housing figures for Fareham at 395 dwellings per annum for the period 2011-2026 which totals 5,925 dwellings, or alternatively the under-provision at Welborne over the development plan period from 2006-2026 of 2,490 dwellings. One of these two bases should be used to allocate housing sites.

The Plan needs complete change, including the parts as itemised above, plus the allocation of my client's site within Chapter 7 of the DPD and associate Tables. The settlement boundary also needs to be redrawn on the Proposals Map to include the site at Posbrook Lane and adjacent existing housing, as shown at Appendix 1.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CH Hemmings', written in a cursive style.

Christopher Hemmings
Associate Director
For and on behalf of WYG



APPENDIX 1: AMENDMENT TO THE SETTLEMENT BOUNDARY AT TITCHFIELD

INSET 6

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