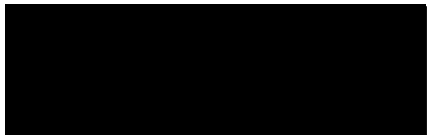


email to

# MADDOX

PLANNING CONSULTANTS

First Floor, 7-10 Bateman's Row  
London  
EC2A 3HH



Linda Jewell  
Head of Strategic Planning and Design  
Fareham Borough Council  
Civic Offices,  
Civic Way,  
Fareham,  
Hampshire.  
PO16 7AZ

a part of the evidence  
base -  
Development Strategy -  
EVII - SHLAA.  
'omission of their site'.

8 December 2017

Dear Ms Jewell,

Fareham Borough Council Draft Local Plan Consultation representations

---

On behalf of our client, Devine Homes, please find below representations made regarding the Fareham Borough Council Draft Local Plan consultation. These representations relate to a parcel of land outside the settlement boundary of the village of Locks Heath, to the west of Botley Road and north of Beacon Bottom. Our comments are made after appraising national policy and guidance set in the National Planning Policy Framework (NPPF), Planning Practice Guidance, and Localism Act 2011.

Overall, we strongly support the decision by the Council to prepare a new Local Plan as it will create the platform to engage proactively with the Council to speed up the delivery of sustainable development in the Borough.

Our client notes that the Council has put forward a number of sites allocated for housing in the emerging plan. However, these representations provide further detail below as to the availability, achievability and suitability of an area of land to west of Botley Road and north of Beacon Bottom.

### Site

The site is a 5.21ha area of vacant land located north of the village of Locks Heath outside the defined urban settlement boundary, just south of the M27 and parallel rail line, and west of Botley Road. The proximity of the site to Locks Heath means that any development will be able to utilise its existing infrastructure in place already.

The site is an irregular shape, divided into two parts; the first a 2.75ha area of land to the west, designated as 'existing open space' and 'countryside' on the adopted Fareham proposals map. The entire northern edge of this part of the site runs alongside the line of the railway. The other is a 2.46ha area of land to the east proposed to be residential, also designated as 'countryside'. Please refer to the attached site location plan for the exact boundaries of both sites.

The site is located immediately adjacent to three sites proposed to be allocated in the Draft Local Plan

---

[www.maddoxassociates.co.uk](http://www.maddoxassociates.co.uk)

for residential uses. To the south, the site HA15 is a 1.24ha area of land bordering Beacon Bottom, with an indicative capacity for 30 dwellings. To the east, the site HA17 is located at 69 Botley Road and is a 0.79ha area proposed to accommodate 24 dwellings, whilst to the south east of the site lies HA26 which is identified as being suitable for five dwellings.

The site as a whole is currently vacant, however is covered by moderately dense scrub. Part of the southern edge of the site which adjoins HA15 is a line of approximately eight English Oak trees protected under a TPO.

Swanwick train station is 0.4 miles (seven-minute walk) away from the site, with trains travelling to Brighton, London, Portsmouth, and Southampton. The site is within Flood Risk Zone 1, affording a low probability of flooding and there is a locally listed building to the south east of the site at 14 Beacon Bottom, which is subject to the housing allocation HA26.

There are no public rights of way crossing or adjacent to the site.

There are no land ownership constraints to the site and our client is able to bring the site forward immediately.

#### Indicative density

The Fareham's SHLAA (2017) assessment of site HA15 assumes 80% of the land is developable with a density of 30dph. When calculating the indicative density of the site the same presumption has been used. This has subsequently resulted in an indicative density of approximately 60 dwellings (30 dph). Therefore, the proposal as a whole is for a comprehensive scheme comprising a 2.57ha area of public open space and approximately 60 new dwellings.

#### Sustainable development

Paragraph 7 of the Framework states that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles to achieve its purpose of contributing to the achievement of sustainable development (paragraph 6). It is explained below how the site would fulfil these three roles and therefore should be considered to be a sustainable development.

#### *Economic role*

The proposed development fulfils the economic role by contributing to building a strong, responsive and competitive economy. Our client's clear position is that the development proposed will generate employment during construction and occupational phases, including by way of additional spending in the local economy by residents. This will subsequently cement the viability and vitality of nearby local services, with easy access by non-motorised means.

#### *Social role*

The social role is fulfilled by providing a supply of housing required to meet the present and future generations within what will be well-designed, high quality built environment. The provision of adjacent recreational open space will create a vibrant, healthy and active community which has access to large accessible space within walking distance of their homes.

#### *Environmental role*

The environment role is fulfilled by enhancing the natural and built environment through the creation of a high-quality residential development supported by substantial landscaping and enhancements to publicly accessible open space and the preservation of existing mature trees on site where possible.

## *Deliverability*

The assessment of developable sites to contribute to housing supply is found within the Framework and the PPG which define the criteria of suitability, availability and achievability. As the below assessment sets out, the site can be deemed to be developable in the context of both the Framework and PPG.

## *Suitability*

In accordance with the NPPG, a site is considered 'suitable' for development when assessed against its physical limitations, landscape impact, appropriateness and market attractiveness, contributing to regeneration priority areas, and environmental/amenity impacts on occupiers and neighbouring areas.

In planning policy terms, the site is deemed to lie within the 'countryside' due to it being outside of the settlement boundary, albeit immediately to the north. However, as set out above, the site is not specifically guarded from development by any protective designation, i.e. there is no specific environmental reason why development should not occur.

Moreover, the site is within a suitable location which has good road and rail access, existing local shops, existing employment opportunities and existing community facilities all within walking distance. As mentioned above, it will provide the opportunity to further enhance the vitality and viability of the existing local shops and services, thereby strengthening the economy of Fareham as a whole. The site is in a suitable position with the physical barrier of the railway line to the north and the allocated sites to the south and east, alongside the environmental barrier of the proposed open space to west preventing any urban sprawl at a later date. It is also imperative to note that the SHLAA (2017) determines that the parcels of land adjoining the site immediately to the south (HA15), east (HA17) and south east (HA26) are all suitable for residential development.

As our client privately owns the area of vacant land within the proposal site, designated as 'existing open space', it is currently not accessible to the public. Through the proposed allocation of the land adjacent for a residential use it will in turn enable our client to bring forward this land to become publicly accessible open space and therefore realise the land's designation. The provision of open space around the village of Locks Heath is somewhat minimal and by actively bringing forward this land specifically for the public's enjoyment will bring about a number of environmental, and social benefits for existing and new residents in the area.

The site is available immediately.

## *Achievability*

A site is considered achievable when there is a reasonable prospect that the particular type of development will be developed on site at a particular point in time. The site is achievable and provides the opportunity to develop much needed housing early in the plan process which is a significant consideration given the level of housing required immediately in the Borough as discussed in further detail below.

## *Strategic matters*

Our client views the decision to prepare a new Local Plan as essential to ensure a viable, deliverable and sustainable solution to growth in Fareham. There are a number of strategic matters that need to be considered in the preparation of a new Local Plan in Fareham and these are set out below:

### *National Planning Policy Framework*

For the Local Plan to comply with the Framework, it is necessary for the Local Plan to address the following:



- Widen the choice of high quality homes (paragraph 9);
- Positively seek opportunities to meet the development needs of the area (paragraph 14);
- Meet objectively assessed needs, with sufficient flexibility to adapt to rapid change (paragraph 14);
- Contain policies which follow the approach and are based upon the presumption in favour of sustainable development (paragraph 15);
- Meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth (paragraph 17);
- Set out a clear strategy for allocating sufficient land which is suitable for development in the area, taking account of the needs of the residential and business communities (paragraph 17);
- Secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings (paragraph 17);
- Boost the supply of housing and meet the full, objectively assessed need for market and affordable housing in the housing market area (paragraph 47);
- Deliver a wide choice of high quality homes and plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community (paragraph 50);
- Set out the strategic priorities for the area including the homes and jobs needed. (paragraph 156);
- Be drawn up over an appropriate time scale, preferably fifteen years and be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations (paragraph 157);
- Allocate sites to promote development, bringing forward new land where necessary and also, identify land where development would be inappropriate, for example because of its environmental and historic significance (paragraph 157); and
- Should be deliverable and viable (paragraph 173).

In addition to the above, paragraph 182 of the Framework sets out that for a plan to be considered sound it must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with policies in the Framework.

#### Housing targets

Policy H1 (Strategic Housing Provision) of the emerging Local Plan sets out that 11,300 net additional dwellings will be provided in the Borough over the period 2011-2036. This equates to a provision of 454 dwellings per annum over the life of the plan.

In arriving at this figure, the Local Plan sets out that the Borough Council, along with its neighbouring authorities, form part of the Partnership for Urban South Hampshire (PUSH) which produced a Strategic Housing Market Assessment for the PUSH sub-region in 2014 within an OAN update published in 2016. The PUSH update 2016 set out that the Council's OAN is 420 dwellings per annum for the period between 2011-2036. However, following on from that document, further work was undertaken by PUSH in June 2016 which resulted in the PUSH Spatial Position Statement. This subsequently sets out that Fareham's OAN has increased to 455 dwellings per annum. However, this was over the period of 2011-2034 rather than up 2036 as per the OAN update.

As a result, the Council has based its housing target on providing for the 10,460 figure (455dpa) as set out within the Spatial Position Statement for the period of 2011-2034; however, for the final two years of the plan period (2034-36) the Plan outlines that the annualised rate will drop to 420 dwellings per annum in line with the PUSH update 2016. This subsequently results in the Local Plan target of 11,300 net additional dwellings.

In this context, we support the Council's aim to maximise its strategic housing target based on an objective assessment of housing need. However, we dispute that that the final two years of the plan period should see a reduction in the annualised target and should instead remain at 455 dpa. This would consequently result in a greater total housing target for the plan period which equates to 12,210 dwellings.

In addition to the above, it is imperative to note that the Council at this time cannot demonstrate a five years supply of housing land. As set out in the recent planning appeal decision issued in April 2017 (ref: APP/A1720/W/16/3156344), and subsequently acknowledged by the Council in its five-year housing land supply report submitted to the Council Executive for decision on 9 October 2017, "**the Council has marginally over 2 years housing supply**" (*our emphasis*). It is therefore essential that this shortfall is also addressed within the first five years of the emerging Local Plan as required under the Sedgfield method for calculating land supply.

Notwithstanding the above, attention must also be drawn to the Government's recent consultation on 'planning for the right homes in the right places', which included a standard methodology for calculating local authorities housing need. As set out within the consultation document, the Government has set out that if a Council has a plan that has been published but not yet submitted prior to the 31 March 2018, then it must use the new standardised method. Having reviewed the Council's Local Plan timetable within the Plan itself, we note that it does not intend submitting the Plan until Autumn 2018 and therefore, it will need to consider the new standardised method.

The Government's current indicative assessment of housing need based on the proposed formula for the period of 2012 to 2026 calculates a need of 531 per annum for Fareham. This is an uplift of 111dpa against the PUSH OAN update 2016 and 76dpa against the PUSH Spatial Position Statement 2016. On the basis of meeting the Government's indicative assessment of 531dpa over the plan period, the Council should be planning for 12,744 dwellings within the new Local Plan, rather than the currently proposed 11,300 dwellings.

Taking the above into consideration, we emphasise the need for the Council to consider allocating further sustainable sites for residential development to meet the additional housing requirements mentioned above. As we have set out, the site put forward in these representations can be considered to be available, suitable and deliverable and will provide circa 60 additional dwellings to assist the Council on its housing delivery.

#### Duty to co-operate

We note the Council has included an interim duty to co-operate statement as part of the evidence base submitted alongside the emerging Local Plan for consultation. The statement sets out that the Council has a high level of cooperation with neighbouring authorities, with the PUSH Spatial Position Statement presented as evidence of such co-operation. At this stage, no detailed logs or reports of co-operation matters have been evidenced; however, we note that the Council set out that they will be provided in due course. With this in mind, it is important to note that the failure to demonstrate compliance with the duty to co-operate would render the plan incapable of being found legally compliant and we would urge the Council to co-ordinate with adjacent authorities in the delivery of the Local Plan and encourage this throughout the life of the Plan.

We also recommend the Council considers preparing a Statement of Common Ground as also set out within the recent Government consultation. The Statement of Common Ground will cover the relevant housing market area and will set out the cross-boundary matters, including housing need for the area,



distribution and proposals for meeting any shortfalls and record where agreement has or has not been reached. As a minimum, Councils will be expected to have an outline statement in place within six months following the publication of the revised Framework and as such, we recommend that the Council consider the preparation of a statement of common ground alongside the emerging Local Plan.

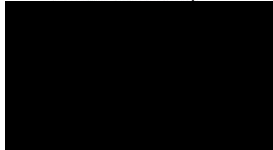
Summary

The site put forward as part of these representations can be considered to meet the tests of the Framework and PPG as it has been demonstrated that it is suitable, available and deliverable. The residential provision which the site is capable of accommodating should be viewed in the context that Fareham is an authority which is struggling to provide a five-year supply of housing and is expected to see its objectively assessed need significantly increased as part of the Government's standard methodology for calculating need. There are also no overriding site constraints that prevent its allocation which will assist the Council on its housing delivery. We therefore request that the site is allocated for residential development within the next reiteration of the emerging Local Plan.

Thank you for providing us with the opportunity to comment of the draft Local Plan document. We trust these comments are of assistance and would be grateful for confirmation that they have been considered as part of this consultation. We also confirm that we would like to be involved in the future stages of the Local Plan preparation.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Senior Planner

cc: 

ref: 0606- Botley Road