

B1

Which part of the Revised Publication Local Plan is this representation about?

- A paragraph Go to B1a
- A policy Go to B1b
- The policies map Go to B1c
- A new housing allocation site Go to B1d
- The evidence base Go to B1e

B1a Which Paragraph? Please enter the correct paragraph found in the Revised Publication Local Plan, e.g. 1.5 would be the fifth paragraph in chapter 1

B1b Which Policy? Please enter the correct policy codes from the Revised Publication Local Plan, e.g. HA1 is Housing Allocation Policy 1- North and South of Greenaway Lane

B1c Which part of the Policies Map ?

Strategic gap delineation and allocation boundary of land south of Longfield Avenue

B1d Which new housing allocation site? E.g. HA55- Land south of Longfield Avenue

B1e Which new or revised evidence base document ? E.g. Viability Assessment

B2 Do you think the Revised Publication Local Plan is:

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

B3 Please provide details you have to support your answers above

Please see the attached Representations.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation.

B4a What modification(s) is necessary to make the Revised Publication Local Plan legally compliant or sound?

Please see the attached Representations.

B4b How would the modification(s) you propose make the Revised Publication Local Plan legally compliant or sound?

Provide a sound policy.

B4c Your suggested revised wording of any policy or text:

Please see the attached Representations.

Please remember this may be your only chance to make a representation, so try to make sure you put in all the evidence and information needed to support your representation. You do not need to resubmit any comments you made during a previous Publication Local Plan Consultation.

B5a If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

Yes, I want to take part in a hearing session

No, I don't want to take part in a hearing session

B5b Please outline in the box below why you consider it necessary to take part in the hearing session(s):

The issues raised in the Representations are important to the achievement of a sound Local Plan and the delivery of housing to meet identified need.

The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination.

Thank you for taking part and having your say.

FAREHAM
BOROUGH COUNCIL



LRM
PLANNING
LIMITED

FAREHAM LOCAL PLAN 2037

Revised Regulation 19 Publication Draft

Response prepared on behalf of Hallam Land Management Limited

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Primary author: Owen Jones

Initialled: OJ

Review by: Kate Coventry

Initialled: KC

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Executive Summary

Hallam Land Management Limited ('Hallam') control a substantial tract of land to the South of Fareham, south of Longfield Avenue, west of HMS Collingwood and to the north of Stubbington Bypass, the construction of which has recently commenced and is due to be completed in Spring 2022.

In successive representations to the Local Plan Review we have drawn attention to the merits and advantages of locating development to the South of Fareham and how this would achieve the Borough Council's objective of *Good Growth*.

In this Revised Regulation 19 Plan, Policy H1 has rightly been amended to accord with the Government's Standard Method for calculating local housing need as required by the NPPF. As a matter of principle, we agree with this approach.

For various reasons set out herein, it is right that Policy H1 is framed in the terms "at least 9,560 new homes" as this is the minimum justifiable amount of new housing needed in the Borough.

Whilst additional housing allocations have been proposed, it remains the case that the Plan's housing supply strategy provides very little flexibility to deal with different circumstances that might arise to those assumptions that it is based upon. This underscores the need for the additional housing allocations as a matter of principle and for them to be delivered with alacrity.

Policy H1 includes as an additional proposed allocation land south of Longfield Avenue to provide 1250 new homes and associated uses. Hallam control the overwhelming majority of the site area shown on the Plan on page 146 of the consultation document.

This land was previously identified in the 2020 Local Plan Supplement as a potential *Strategic Growth Area*. Whilst the 2020 Regulation 19 Plan did not carry this forward because it proposed a lower level of housing, this allocation is a continuation of that earlier approach and the assessment work undertaken at that time. Importantly, this proposed allocation is entirely consistent with and supports delivery of the Plan's *Vision, Strategic Priorities* and the *Development Strategy*.

It is evident from the above that development in accordance with Policy HA55 would deliver positive *social and economic benefits*. As is often the case, there are conversely *negative environmental effects* associated with greenfield development. Importantly, as the Sustainability Appraisal and Habitats Regulations Assessment both acknowledge, mitigation measures will be achieved either by embedded elements in the scheme or by measures secured pursuant to other Local Plan policies that will minimise these potential negative effects.

Policy HA55 lists site-specific requirements that development proposals should meet. It is important to recognise that these criteria will be those that are used to assess future development proposals at the Development Management stage. In this regard, we are mindful of the requirement in paragraph 16(d) of the NPPF for policies "*to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*".

In the context of comments on various of the Policy's criterion we have prepared alternative policy wording which we consider better meets the NPPF's requirements whilst retaining the thrust of the policy's intended outcomes.



Whilst we support the inclusion of an Illustrative Land Use Framework Plan on page 148 of the consultation document, our representations have drawn attention to important considerations; firstly, the extent of green infrastructure not related to the development proposals, and secondly, the potential constraint in achieving the overarching policy requirement of 1250 new homes and associated uses by the way the developable area is delineated.

Finally, the delineation of the Strategic Gap south of Fareham should be amended to exclude the proposed allocation HA55. The southern boundary of the allocation should be drawn at Tanners Lane, rather than extending south and across open fields.



1 Introduction

- 1.1 Hallam Land Management Limited ('Hallam') control a substantial tract of land to the South of Fareham, south of Longfield Avenue, west of HMS Collingwood and to the north of Stubbington Bypass, the construction of which has recently commenced and is due to be completed in Spring 2022.
- 1.2 In successive representations to the Local Plan Review we have drawn attention to the merits and advantages of locating development to the South of Fareham and how this would achieve the Borough Council's objective of *Good Growth*.
- 1.3 In the January 2020 Local Plan Supplement, this land, along with other parcels in this broad location, was identified by the Borough Council as a potential *Strategic Growth Area*. In June 2020, an outline planning application was submitted for development south of Longfield Avenue, reflecting the direction of travel of the Local Plan at that time. The LPA has yet to determine this application.
- 1.4 In the November 2020 Regulation 19 Plan, such an allocation was not carried forward because the Council were proposing a level of housing that was different to and lower than the Government's published Standard Methodology for calculating housing need.
- 1.5 By now, the Council has rightly reverted to calculating its housing need by reference to the Standard Method consistent with the NPPF. This has increased the overall housing requirement and led to additional proposed allocations to meet this.
- 1.6 In this context, Policy HA55 proposes the allocation of a new urban extension to the South of Fareham for 1250 new homes and associated uses. Hallam support the principle of this proposed allocation.
- 1.7 Land South of Fareham is an eminently suitable and sustainable location for future development. In the context of the Borough Council's *Good Growth* principles that underpin the Plan's Development Strategy, the development proposals will achieve the high-level development principles and requirements set out in the Local Plan.
- 1.8 Development at South Fareham can be brought forward to provide new homes and associated community and commercial facilities within an overall scheme that provides accessible green infrastructure and open space, enabling residents and visitors to experience a high quality of life and well-being. The accessibility of this location can be capitalised upon with investment in new sustainable and active modes of travel. By locating new development here, valued landscapes and natural environments elsewhere in the Borough will be preserved.
- 1.9 It is especially significant that the Borough Council's assessment of Strategic Gaps has drawn the conclusion that new development can be located south of Longfield Avenue without harming the integral purpose of this earlier designation. We agree with this conclusion, which accords with our previous submissions that carefully planned development will not result in the coalescence of Fareham and Stubbington and that the separate identities of these settlements can be retained. That said, we disagree with the way in which the Key Diagram and Policies Map continue to define land proposed for development as being within the Strategic Gap; the delineation of the Strategic Gap should be amended accordingly to provide the plan reader an



unambiguous explanation of its intentions.

- 1.10 In the following Sections we comment on the changes proposed in this current version of the Regulation 19 Plan – the Revised Plan. Certain of our previous representations have been superseded by these changes, however, a number of others remain and we have not repeated those on this occasion. For convenience we have prepared a Schedule at *Appendix 1* which identifies those earlier representations that remain relevant and those that have been superseded and are no longer relevant.
- 1.11 In one instance we draw attention to how Policy HP9 should have been amended to reflect the fact that the overall amount of housing to be provided has increased.
- 1.12 In summary, our representations are as follows:
- a. We support the reversion to the Government’s published Standard Methodology - the minimum housing requirement should be defined by reference to 540 dwellings per annum;
 - b. Whilst the strategic housing requirement has been increased to “at least 9,556 additional dwellings” for the period 2021 to 2037, for various reasons this represents the minimum housing level:
 - No account has been taken of the low level of completions from 2018 onwards compared to the level of local housing need;
 - The nominal 900 dwellings identified to meet unmet need is only a small proportion of the estimated shortfall across the sub-region;
 - c. Whilst assumptions about the delivery of new housing at Welborne have been revisited and revised down, it remains the case that the Plan is very dependant of delivery from this one large site;
 - d. No further evidence has been provided to justify the windfall allowance;
 - e. The level of flexibility or contingency has reduced in the overall housing supply strategy;
 - f. These considerations underscore, as a matter of principle, the need for the additional allocations made in the Revised Plan, and in particular Policy HA55 (land south of Longfield Avenue) given its importance in contributing to the Plan’s *Vision, Strategic Priorities and Development Strategy*.
 - g. To ensure that the text relating to Policy HA55 is “*clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”, we have proposed alternative wording.
 - h. The Illustrative Framework Plan as presently drawn is not supported:
 - firstly, the extent of green infrastructure shown is not related to the development proposals, and
 - secondly, the potential constraint imposed by the delineation of the extent of built development in achieving the overarching policy requirement of 1250 new homes and associated uses.
 - i. Separate from the allocation of land South of Fareham, the boundary of the Strategic Gap south of Longfield Avenue and west of HMS Collingwood should be amended so as not to



include the land identified by the Borough Council's *Technical Assessment* that is not considered integral to the Gap function.



2 Policy H1: Addressing housing needs by the end of the plan period in an appropriate and sustainable manner

2.1 In this Section we consider the revision to Policy H1 which increases the housing requirement to “at least 9,560 dwellings” and the housing supply strategy proposed to achieve the provision of this number of new homes within the plan period.

Housing Requirement

2.2 Policy H1 has been amended so as to accord with the Government’s Standard Method for calculating local housing need as required by the NPPF, absent any exceptional circumstances to justify a different approach. As a matter of principle, we agree with this approach.

2.3 However, it is important to consider the adequacy of Policy H1 in the context of the Plan’s Vision and Strategic Priorities.

2.4 The Borough Council’s Vision as set out in the consultation document intends that it:

- *“will accommodate development to address the need for new homes and employment space in Fareham Borough; and*
- *new housing will address the particular needs in the Borough, such as our growing housing need and an ageing population and creating attractive places to live”.*

2.5 Set within this Vision, the Plan’s first Strategic Priority is to:

- *address the housing and employment needs by the end of the plan period in an appropriate and sustainable manner, creating places people want to live or where businesses want to locate.*

2.6 In this context, it is instructive to consider the key housing issues identified in the Sustainability Appraisal in its Baseline Report:

- a. House prices in Fareham, whilst lower than Hampshire and South East averages, are higher than other authorities (e.g. Havant and Gosport) in south east Hampshire;
- b. Affordability of housing is a key issue for Fareham; the ratio between median earnings and house prices in the Borough remains in excess of 9 times earnings;
- c. Annual housing completions in the Borough have fallen since the highs for 2006-07 and 2007-08, but have recovered to more than 250 per annum over the last five years;
- d. An ageing population in the borough will increase the demand for certain types of housing.

(para 9.9.1 refers)



- 2.7 Moreover, it identifies that, without a new Local Plan, the supply of housing would not be sufficient to meet identified needs. Hence the importance that Policy H1 is prepared with the objective of contributing to the achievement of sustainable development and is prepared positively, in a way that is aspirational but deliverable.
- 2.8 As amended, Policy H1 requires the “**provision of at least 9,560 new homes across the Borough between 2021 and 2037**”. Table 4.1 of the consultation document provides the genesis for this, which for convenience has been reproduced below:

Local Plan Housing Requirement	
Fareham Annual Housing Need	541
Plan Period 2021-2037	16 years
Total Housing Need	8,656
Contribution to unmet need from Neighbouring authorities	900
Total Housing Requirement	9,556

- 2.9 There are four observations to make in relation to this.

Providing for objectively assessed needs for housing as a minimum

- 2.10 The NPPF’s presumption in favour of sustainable development requires that a local plan’s strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
- 2.11 Only if, by reference to policies in the NPPF that protect areas or assets of particular importance, there exists strong reasons for restricting the scale of overall development, or that any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, would there be a justifiable reason not to provide for such a level of new housing.
- 2.12 No such reasoned justification exists in this instance. Neither the Sustainability Appraisal nor the Habitat Regulations Assessment suggest that this scale of development is close to exceeding any identifiable environmental threshold.

Past completions

- 2.13 The way in which the plan period has been defined, covering the period from 2021 onwards, does not recognise past housing delivery relative to the established level of housing need. We drew attention to this in our previous representations and set out a comparison between past completions at that time and have updated this below:

Year	Number of Completions	Level of Local Housing Need	Shortfall
2018/2019	290	520	230
2019/2020	285	520	235
2020/2021*	214	541	327

*Projected housing supply Five Year Land Supply Position February 2021

- 2.14 On this basis, the number of new homes built (or projected to be built) in the years since plan making commenced and the Government’s Standard Method was first published, is some 800 less than is shown to be required.



Unmet need from adjoining authorities

- 2.15 Section 33A of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to cooperate with, *inter alia*, other local planning authorities, and engage constructively, actively and on an ongoing basis in the preparation development plan documents, so far as relating to strategic matters. Paragraph 25 of the NPPF says '*strategic policy making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans*'.
- 2.16 In this regard, the 'plan-making' section of the PPG provides guidance in relation to the duty to cooperate. Paragraph 022 states that strategic policy making authorities are expected to have addressed key strategic matters through effective joint working, and not deferred them while relying on an inspector to direct them. It states "*[An] Authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved; this will be thoroughly tested at the plan examination.*"
- 2.17 Fareham is part of the Partnership for South Hampshire (PFSH) area and a Joint Committee structure exists to inform consideration of strategic matters across this sub-region. In 2016, it produced a Position Statement which identified a distribution of new housing across the constituent local authority areas. More recent work was undertaken by PFSH in 2020 to reflect the requirement to calculate local housing need by reference to the Standard Method¹.
- 2.18 Reflecting this 2020 work, the consultation document acknowledges that there is "*a significant likelihood of a substantial level of unmet need in the sub-region*" (para 4.4) and that over the plan period the level of unmet need in the sub-region could be circa 10,750 new homes.
- 2.19 In this context the consultation document makes an allowance of an additional 900 dwellings houses as a contribution to meeting unmet need from Fareham's Neighbouring Authorities; (increased from 847 previously).
- 2.20 There is no evidence of how this figure has been derived. All that is evident from the earlier passages of paragraph 4.4 is the very unclear picture that exists and which is subject to additional work by PFSH. Consequently, the proposed contribution of 900 dwellings - less than 10% of the possible unmet need - doesn't appear to have any basis in a full and proper assessment of future housing requirements and supply across the sub-region.
- 2.21 In comparison, the request from Portsmouth City Council in response to the emerging Local Plan in February 2020 was for Fareham to accommodate 1000 new homes which is approximately a third of the City's unmet need. Moreover, it is understood that there is expected to be an unmet need of in the order of 2,500 homes from Gosport. Similarly, Southampton's local housing need calculation is now based on the Cities uplift which would not have been accounted for in the September 2020 PFSH work, and the unmet need is therefore likely to be greater still.

¹ This figure originates from the September 2020 Partnership for South Hampshire Joint Committee Paper entitled 'Statement of Common Ground – Revisions and Update' and which is referred to in the Council's 'Statement of Compliance with the Duty to Co-operate'.



The minimum 15-year plan period

- 2.22 The current consultation document is based on the plan period 2021-2037, but in reality the plan will not be adopted until 2022, meaning it would cover the minimum period of 'at least 15 years'. This provides little "flexibility to adapt to rapid change".

Summary

- 2.23 Each of the above reasons indicate that the housing requirement in Policy H1 is the minimum justifiable amount necessary. This underpins why Policy H1 refers to this as a minimum requirement, with the term "at least". Equally, it demonstrates why the land supply strategy, and the additional land allocated to meet this higher housing requirement is, as a matter of principle, necessary.

Housing Supply

- 2.24 Having considered the housing requirement in the preceding paragraphs, it is also important to consider the Plan's housing supply strategy (i.e. how it intends to provide the number of new homes specified in Policy H1). We make three observations in respect of this.

Delivery at Welborne

- 2.25 The consultation document's housing strategy is still heavily reliant on housing delivery at Welborne, which was previously identified to meet sub-regional requirements. Table 4.2 of the consultation document indicates that some 3,600 new homes are to be built at Welborne by 2037 to meet Fareham Borough's local housing need. Whilst this is some 400 less than was suggested in the 2020 consultation document, it is still a significant amount on housing.
- 2.26 It has been readily apparent for some time that past delivery assumptions at Welborne could not be achieved. Despite the Core Strategy and the Welborne Plan assuming a significant number of new homes would have been built at Welborne by the present time, there is still no outline planning permission some 21 months after the Borough Council's Planning Committee first resolved to grant permission (P/17/0266/OA) in October 2019. Indeed, planning obligations have needed to be renegotiated.
- 2.27 A number of housing trajectories have been proposed for Welborne at different stages. We understand the most recent to have been published is that prepared by Lichfields². This concludes at paragraph 5.7 that "Taking account of the above evidence, Lichfields and the Council believe that a delivery rate of c250 homes per annum (following a two year bedding in period) is the realistic maximum annual rate of delivery that can be supported by evidence at this juncture". Later it suggests that this could increase to 275 dwellings per annum whilst the site promoter believes 300+ dpa could be achieved.
- 2.28 Assuming that development commences in 2023/2024, on the basis of the "realistic build rate", this would mean little more than 3,000 completions by 2037.
- 2.29 Only if the higher build rate of 300dpa is achieved would the Plan's assumption of 3,600 new

² Welborne Garden Village: A Delivery Trajectory for Welborne



homes be realised.

Windfall

- 2.30 In our previous representations we commented on the evidence to support the windfall estimate in Table 4.2 of 1,224 new homes between 2021 and 2037. We do not repeat that here.
- 2.31 It is important to recognise that windfall opportunities are finite. Opportunities to redevelop vacant or redundant land will have largely been exhausted by the present time because of planning policies that have prioritised such sources of supply for the past decade and longer. Consequently, future windfall over the plan period will rely to a much greater extent on recycling of land (i.e. existing uses being changed). This is inevitable a less certain source of housing supply.
- 2.32 By the present time the Council has included a Town Centre Broad Location to deliver some 600 new homes, in addition to the various other allocations made in the town centre (FTC3 - FTC9). It is not clear whether in fact housing in the Broad Location would have been part of the windfall assumption otherwise and in the fact double counting has arisen.

Flexibility

- 2.33 Paragraph 4.12 of the consultation document refers to the flexibility that the Council propose within its housing supply strategy. As indicated previously we agree with this as a matter of principle.
- 2.34 The Council state: "*A minimum of 10% additional supply is suggested by the Planning Inspectorate but given the reliance on large sites within the supply, a more precautionary 11% is proposed*". The additional 1% precautionary allowance over and above the 10% that is suggested to be standard practice amounts to an additional 83 dwellings. We note that in the 2020 Regulation 19 Plan the level of additional flexibility proposed was 15%.

Summary

- 2.35 Whilst additional housing land has been identified in the new Regulation 19 plan, it remains the case that, as set out previously, the Plan's housing supply strategy provides very little flexibility to deal with different circumstances that might arise to those assumptions that it is based upon. This underscores the need for the additional housing allocations as a matter of principle and for them to be delivered delivered with alacrity.



3 Policy HA55: Land South of Longfield Avenue

- 3.1 Policy H1 includes as a proposed allocation to meet the Borough's housing requirement, land south of Longfield Avenue to provide 1250 new homes and associated uses. Hallam control the overwhelming majority of the site area shown on the Plan on page 146 of the consultation document.
- 3.2 This land was previously identified in the 2020 Local Plan Supplement as a potential *Strategic Growth Area*. Whilst the 2020 Regulation 19 Plan did not carry this forward because it proposed a lower level of housing, this allocation is a continuation of the Council's earlier approach and the assessment work undertaken at that time.
- 3.3 It is evident from the previous Section concerning Policy H1 and the amount of housing the Plan proposes and its assumptions as to how this will be met, that the Longfield Avenue site is an extremely important part of the housing supply strategy. Significantly, it can provide housing land over the plan period, both in the short term and continuity over the long term.
- 3.4 In this Section we describe the following:
- the consistency of this proposed allocation with the Local Plan's Development Strategy,
 - the merits and benefits of development in this location, and
 - the findings of the Sustainability Appraisal and the Habitats Regulations Assessment.
- 3.5 We also comment on the Site-Specific considerations set out in the Policy and the Land Use Framework Plan and suggest alternative wording in some instances to aid with its clarity and practical application at the development management stage in the context of Section 38(6) of the Act.

Development Strategy

- 3.6 This proposed allocation is entirely consistent with and will contribute towards the Plan's Development Strategy.
- 3.7 The Council's Development Strategy is explained in its *Sustainability Appraisal* on page 29. Having considered a range of potential alternative strategies, **Residential Option 2F** is comprised of a number of elements:
- priority is afforded in the first instance to maximising developable sites in the urban area with a focus on regeneration and redevelopment opportunities in Fareham Town Centre
 - to supplement this, there is a focus on larger sites to achieve place making and wider benefits with a range of other sites as a portfolio approach
 - new development is distributed across the Borough relative to accessibility considerations
 - there is an identified preference for locations that have lower landscape sensitivity and sites that provide a logical extension to the existing urban area and / or defensible urban edge



for the future.

- 3.8 Plainly it is not possible for all of the Borough’s future development needs to be met within the urban areas or on previously developed land; as such greenfield sites, such as HA55, are a legitimate and necessary part of the housing land supply strategy.

Locational Merits

- 3.9 Fareham is a sub-regional centre and is the main focus for facilities and services in the Borough. The town is the largest in the Borough with a population of around 37,300. It follows that development which adjoins the existing urban area will benefit from accessibility and connectivity to these facilities and services, enhancing opportunities for active travel and supporting the vibrancy and vitality of the town.
- 3.10 Fareham is also an important economic centre, which has developed further over recent years with the success of The Solent Enterprise Zone at Daedalus to the south of the town supported by significant investment in infrastructure improvements including improvements to Newgate Lane and the Peel Common Roundabout.
- 3.11 In this context, a new, mixed use masterplanned development to the South of Fareham benefits from its proximity to the town centre, Daedalus, the railway station and existing local services and amenities with good access to walking, cycling and public transport links. These are locational merits that align with the Plan’s intention to achieve *Good Growth*.
- 3.12 The accessibility advantages of this location, coupled with the intended mix of uses proposed as part of the development, enables positive promotion of active travel.
- 3.13 The *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* identifies that the land south of Longfield Avenue and west of HMS Collingwood could accommodate new development without a significant adverse effect on the objectives of the Strategic Gap designation. This land is not identified as a ‘special landscape area’.
- 3.14 The Stubbington Bypass is being constructed to connect Gosport Road, Peak Lane and Titchfield Road. This is located immediately south of the proposed allocation HA55 as is shown on various plans including the Key Diagram on page 23 of the consultation document. This built infrastructure will inevitably change the character of this location and create an urbanising influence through the centre of the existing Strategic Gap between Fareham and Stubbington. Development to the south of Fareham would assist in assimilating the bypass and soften the impact of the road beyond what could be achieved from constructing the bypass alone.

Sustainability Appraisal

- 3.15 Appendix K of the Sustainability Appraisal provides commentary regarding land south of Longfield Avenue. In summary form its conclusions are also shown at Appendix F and are reproduced for convenience below:

SEA Objective	
SA1	To provide good quality and sustainable housing for all
SA2	To conserve and enhance built and cultural heritage
SA3	To conserve and enhance the character of the landscape



SEA Objective		
SA4	To promote accessibility and encourage travel by sustainable means	Minor Mixed
SA5	To minimise carbon emissions and promote adaptation to climate change	Minor Negative
SA6	To minimise air, water, light and noise pollution	Minor Negative
SA7	To conserve and enhance biodiversity	Minor Negative
SA8	To conserve and manage natural resources	Moderate Negative
SA9	To strengthen the local economy and provide accessible jobs	Minor Positive
SA10	To enhance the vitality and viability of centres and respect the settlement hierarchy	Minor Positive
SA11	To create a healthy and safe community	Moderate Positive

- 3.16 It is evident from the above that development in accordance with HA55 would deliver positive *social and economic benefits*. As is often the case, there are, conversely, negative environmental effects associated with greenfield development. Importantly, as the Sustainability Appraisal and Habitats Regulations Assessment both acknowledge, mitigation measures will be achieved either by embedded elements in the scheme or by measures secured pursuant to other Local Plan policies that will minimise these potential negative effects.
- 3.17 In this regard various of the Plan’s policies provide a framework for ensuring that individual development proposals provide the necessary and associated mitigation.³ In certain instances the site-specific policies reflect the need for mitigation measures also. The site-specific criteria are discussed at paragraphs 3.30 – 3.59.

Habitats Regulation Assessment

- 3.18 Development of the land south of Longfield Avenue has been considered to have a *potential* effect on various European designated sites as explained in the Habitats Regulation Assessment. Section 2 of the HRA lists and describes the various Special Protection Areas, Special Areas of Conservation, and Ramsar Sites in the locality. Site HA55 has the *potential* to impact on the River Itchen SAC, Solent Maritime SAC, New Forest SAC/Ramsar, New Forest SPA, Porsmouth Harbour SPA/Ramsar, Solent & Dorest Coast SPA, Solent & Southampton SPA/Ramsar. This proposed allocation is not unique in this sense; the HRA identifies that all proposed housing allocations, namely HA1 to HA56, FTC3 to 9 and BL1, give rise to *potential* effects for various reasons.
- 3.19 Of particular relevance to HA55 are the following *potential* impacts:
- a) nitrate levels and water quality;
 - b) disturbance to breeding birds / overwintering birds either through loss of or displacement from functionally-linked habitat; and
 - c) increased recreational pressure.
- 3.20 These potential impacts are discussed in the following paragraphs.

³ Policies HE1 to HE6 and D1 in respect of Heritage, Policies DS3 in respect of landscape, Policies TIN1 and TIN3 in respect of travel, Policies D1, NE6 and NE8 in respect of climate emissions and adaptation to climate change, Policies NE1 to NE6 in respect of the natural environment, Policies D1 to D5 in respect of Design and environmental performance.



Nitrates

- 3.21 The land is located directly west of the edge of urban area that forms part of the designated Chichester, Langstone and Portsmouth Harbours Eutrophic NVZ (TraC) (Nitrate Vulnerable Zone). The land is currently predominantly arable farmland; intense farming with fertilization with natural manures will lead to nitrate leaching into the surrounding surface water and ground water environment.
- 3.22 With development of the land, the leeching of nitrates through farming activities will be curtailed. Appendix III of the HRA indicates that development of Site HA55 will have a positive effect on the nutrient budget (i.e. reducing the *kg/TN/year* compared to the current situation). This is clearly a beneficial aspect of Site HA55 being developed for housing.
- 3.23 Peel Common Wastewater Treatment Works, which are close to Site HA55 but serves a very wide catchment area extending to Eastleigh, Gosport, Test Valley and Winchester, is predicated to reach capacity by 2025 at which point a review of the N permit will be required. Importantly, given that HA55 has been assessed as nutrient negative, its development will not exacerbate the nutrient load but will rather enable other development to be accommodate that would otherwise increase the nutrient load at the WWTW. In other words, HA55 creates additional capacity within the nutrient budget.

Breeding Birds / Overwintering Birds

- 3.24 The Policies Map includes designations relating to Waders and Brent Geese that are associated with Policy NE5. This designation covers four categories of land – Core and Primary Support Areas, Secondary Support Areas, Low Use Areas and Candidate Areas. As it relates to the HA55 area, this is shown as *BG&W Classification 4 - low use*.
- 3.25 Previously we commented on this illustration in the context of Policy NE5 and that representation remains. To delineate these areas in the manner shown on a Policies Map, which affords permanence to the designation, fails to take account of the potential changes in circumstance and is not sound as a matter of principle.
- 3.26 Development at HA55 could potentially lead to an adverse effect on breeding birds and overwintering birds as a consequence of the loss of this low use functionally linked habitat. However, as the HRA acknowledges, Policy NE5 provides a counteracting measure by requiring on-site mitigation or off-site enhancement and/or financial contribution consistent with the approach taken to mitigating and off-setting adverse effects. In the instance of HA55, the Policy proposes that an area of land west of Peak Lane is 'retained, enhanced and managed to provide sufficient habitat to mitigate the proposed development'. This is considered to effectively avoid and mitigate the potential impact.

Increased Recreational Pressure

- 3.27 Site HA55 is within the 5.6km zone associated with various designated sites and will give rise to an increase in population that could cause a greater recreational pressure in those areas. This increased activity could cause trampling of vegetation, soil compaction and erosion and displacement of birds from otherwise suitable feeding or roosting habitats.
- 3.28 Again, as the HRA acknowledges, Policy NE3 provides a counteracting measure, devised in



conjunction with Natural England as part of the *Solent Recreation Mitigation Partnership* which is considered likely to effectively avoid and mitigate such an impact.

HRA Conclusions

- 3.29 The HRA concludes that the proposed allocation (and the Plan as a whole) is not likely to cause significant effects on the various European designated sites and is therefore compliant with the Habitat Regulations.

Site-Specific Criteria

- 3.30 Policy HA55 lists site-specific requirements that development proposals should meet. It is important to recognise that these criteria will be those that are used to assess future development proposals at the Development Management stage. In this regard, we are mindful of the requirement in paragraph 16(d) of the NPPF for policies *"to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"*. We comment on these criteria in the following paragraphs.

Criterion A. Masterplan and Design Code

- 3.31 We agree that the development proposals should be based upon a Masterplan. This accords with NPPF para 75(c). We interpret this to be similar to that set out on Figure 11 of the National Model Design Code (page 15).
- 3.32 In our experience, the preparation of such a Masterplan is best served by this being a collaborative exercise rather than Council led to ensure that its content is properly informed by a range of considerations.
- 3.33 We do not understand what is intended by an *"appropriate policy tool such as a supplementary planning document"* as this implies a particular statutory process defined by Regulations. We do not consider such a statutory process to be necessary and the same outcome, a collaborative process with appropriate engagement, can be satisfactorily achieved without being a formal SPD.
- 3.34 Lastly, the phrase *"in accordance with the HA55 Strategic Land Use Framework Plan"* gives the statutory weight of the development plan to this [Illustrative Plan](#) on page 148 of the consultation document. We disagree with this approach.
- 3.35 Rather, the masterplanning process must be allowed to develop that Illustrative Framework Plan through rigorous testing of development and land use objectives to arrive at:
- A landscape strategy, taking account of existing natural features of the site and wider area, biodiversity and new structural elements.
 - Green infrastructure including the amount and position of open space provision.
 - The number, type and tenure of homes and other uses (from the local plan allocation).
 - The points of access and connection to the wider street network.
 - The broad position of the primary and secondary streets but not local streets.



- The position of the local centre, primary school and sports hubs.
 - The area types that will apply to different parts of the site (which will in turn reference rules on density, height, street building line etc.)
 - Sustainability measures and supportive design in respect of masterplanning
- 3.36 This process could result in a different arrangement of development. For example, the extent of the flexible development edge may not be sufficient to achieve the place making objectives, land use requirements and other planning policy and masterplanning considerations. We propose an alternative form of words at para 3.59.
- 3.37 We also agree that a Design Code would be an appropriate tool to guide future detailed development proposals, given its scale and likely delivery period. In our opinion there is an important distinction to be drawn between a Site Wide design code which establish design 'rules' at a strategic level (rules on density, height, street building line etc.) as compared with a much finer grain Code that is focused on the individual character areas. It would not be necessary or appropriate to require such a level of detail as suggested by Stage 3A in the National Model Design Code prior to the submission of an outline planning application.
- 3.38 The scale of development concerned is such that it will be delivered over a long term – some ten years – and it is critically important that the design coding process can adapt to circumstances that exist at different points in the development programme as reserved matters applications are prepared and determined. To fix detailed design rules at the outset and for them to endure for some ten years will not allow for those changes in circumstance. For example, implementation of the Future Homes Standards will give rise to changes in housebuilding both in terms of layout and appearance. Similarly adaptation strategies for climate change will evolve over time as best practice changes. It is imperative that the design coding process allows for adaptability over time.
- 3.39 In this context, we see a Strategic Level Design Code being required at the outline planning application stage as part of the Masterplan but that more detailed Area Level Design Codes are required pursuant to a planning condition. We understand a similar two stage approach is proposed at Welborne. We have set out at *Appendix 2* what we consider to be a suitable structure for this design cascade.

Criterion B. Built form, its location and arrangement to protect integrity of the Strategic Gap

- 3.40 In earlier representations we have drawn attention to the conflict between (a) the proposed allocation at South Fareham and (b) retaining the Strategic Gap designation across all of the undeveloped land between Fareham and Stubbington on the Policies Map. We discuss this in detail in Section 5, however, we consider that the boundary of the Strategic Gap should be redrawn at Tanners Lane to accord with the Plan at *Appendix 3*.
- 3.41 It is inevitable that there will be a change in the character and appearance of the land that is to be developed; new housing and associated uses will replace open countryside. Importantly the analysis undertaken on behalf of the Council and set out in the *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* draws the significant conclusion that development in this location can be accommodated without significant adverse effect on the function of the



Strategic Gap.

- 3.42 There will continue to be undeveloped land between the new urban edge of Fareham and the northern extents of Stubbington such that the settlements do not coalesce, and their separate identities will be retained. It is important to recognise that north of Tanners Lane there is a substantial existing belt of woodland planting that to a large extent encloses the land to the north thereby limiting ones viewing opportunity and experience from this Public Right of Way. Moreover, the Stubbington bypass results in urban infrastructure between Tanners Lane and Stubbington alongside existing farm buildings associated with Newlands Farm. Each of these features has a material effect on the actual sense of openness between the two settlements and, together with new planting limit inter-visibility and intra-visibility between the new development and Stubbington is minimised if not avoided altogether.
- 3.43 In this context, it is not clear what this criterion is seeking to achieve, other than ensuring a sensitive landscape edge to the new development is maintained or created, the principle of which is unobjectionable. We have proposed alternative wording in the following section.

Criterion C. West of Peak Lane.

- 3.44 We agree with the concept of focusing built development east of Peak Lane and, as with the Land Use Framework Plan in the consultation document, land west of Peak Lane should provide green infrastructure. The land west of Peak Lane is already subject to informal recreational use, either by means of the existing Public Right of Way between Peak Lane and Ranvilles Lane or by well used informal (and unauthorised) routes within Oxley's Coppice and fields to the south and west of existing woodland.
- 3.45 Criterion H also concerns the land west of Peak Lane and suggests that all of this land should be provided as habitat to mitigate the site's existing *BG&W low use classification*. The creation of new habitat on-site is a counteracting measure that Policy NE5 permits for low-use classification land. The alternative is off-site enhancement and/or financial contribution consistent with the approach taken to mitigating and off-setting adverse effects.
- 3.46 We interpret this criterion as requiring the creation of an area of more suitable habitat that could encourage 'higher use' to compensate for the loss of larger areas of 'low use'. It is important to recognise that in fact the evidence of Brent Geese and Waders using the land concerned is extremely sparse and successive surveys has not substantiated the use of this land by any of the target species in recent years. Some of the land east of peak lane remains in low use by golden plover, with a small number using localised parts of the site on a semi-regular basis.
- 3.47 Whilst the land west of Peak Lane has the potential to perform this function and suitable habitats could be provided in the forms of short open grassland, wetland and *scrapes*, its potential utility is influenced by its character and that of its surroundings which in this instance includes the proximity of Peak Lane, the proximity of Stubbington bypass, the substantial vegetation associated with Oxley's Coppice, existing hedgerows, the Public Right of Way that runs east-west in this location and the informal (and unauthorised) public access across the land. A portion of the land will need to be fenced, and some sections screened, to provide a permanent undisturbed areas of wader habitat, but it will be possible to create a space that incorporates public access and mitigation.



- 3.48 This land can at the same time provide an important recreational and educational opportunity by regularising and formalizing public access. This would reduce recreational pressure at the nearby designated sites in accordance with Policy NE3. This would be consistent with criterion G.
- 3.49 In reality, therefore, land west of Peak Lane has the potential to serve as a multifunctional greenspace and the policy wording should allow this flexibility. We have proposed alternative wording in the following section.

Criterion D. Walkable Neighbourhoods.

- 3.50 We agree that development in this location should prioritise walking and cycling as a means of movement with the development capitalising on the mix of uses that will be provided and that exist locally. Integral to the design is a permeable neighbourhood which priorities walking and cycling, and which provides easy access to public transport services. To improve the clarity of this criterion, especially the reference to the Rapid Transit uniquely in the opening line from other destinations in the final line, we have proposed alternative wording in the following section.

Criterion E. Access from Longfield Avenue and Peak Lane.

- 3.51 We agree that pedestrian, cycle, public transport and vehicular access should be provided from two points of access: Longfield Avenue and Peak Lane. None of the highway assessment work conducted by the Council or Hallam has suggested that an access on to Stubbington bypass is necessary.

Criterion F. Pedestrian and cycle links and Rapid Transport.

- 3.52 We agree that the proposed development should be served by an internal network of footways and access arrangements that can be utilised by both pedestrians and cyclists. The site is surrounded by Public Rights of Way that in turn can serve as connections from the site to other destinations in its vicinity. These will be maintained and improved in order to encourage an alternative sustainable modes of travel.
- 3.53 Bus based public transport is also a feasible means of sustainable travel from this location. The scale of development proposed is sufficient to deliver dedicated public transport coverage between the Site and key destinations that will have the frequency and reliability to attract patronage to secure long term viability. Any improvement will be discussed with the necessary stakeholders, but it is envisaged that the development will support the introduction of new services.
- 3.54 The Eclipse Busway - a Bus Rapid Transport scheme between Fareham and Gosport opened in 2012 providing a priority public transport route connecting the two towns – operates to the east of the Site. As part of off-site walking and cycle improvements, connectivity with the Busway could be improved.
- 3.55 In many respects this criterion overlaps with Criterion C in terms of accessibility and connectivity, and we have proposed an alternative wording in the following section.



Criterion G. Publically accessible and managed green infrastructure.

- 3.56 We agree that an important part of place making and maximising the assets of this location is the creation of publicly accessible greenspace. There are identifiable opportunities to create a new linear park along the southern edge of the proposed development that can serve both as public open space for the new and existing communities whilst also achieve new and sensitive landscaped edge to the town. Again, a similar opportunity exists west of Peak Lane to achieve a carefully placed recreational route alongside new habitat creation as part of a multifunctional greenspace offer. There is overlap between criteria B, C and G and we have proposed alternative wording in the following section.

Criteria H. Solent Wader and Brent Goose habitat.

- 3.57 We have discussed this in the context of Criterion C above.

Criteria I. Construction Environmental Management Plan.

- 3.58 We have no comments in relation to this Criterion; it replicates custom and practice and is a counter measures identified in the HRA.

Criterion J. Infrastructure Provision

- 3.59 **Primary school.** We agree a new primary school is required to accommodate primary school children from the proposed development.
- 3.60 **Mixed use local centre.** We agree that a mixed-use local centre will provide local services and facilities to support the new community. Moreover, such provision will complement that available to the existing community at *inter alia* Broadlaw Walk.
- 3.61 **Sports Hub.** The requirement for the Sports Hub emanates from the Council's Playing Pitch Strategy undertaken by WYG on behalf of the Council (February 2021). This Study identified that, firstly, there are existing deficiencies and shortfalls in the available playing pitches for various sports in the Borough that would, secondly, be exacerbated with future population growth. It follows that, whilst the proposed development will give rise to new sports provision requirements, the Sports Hub is not directly related to just this proposed allocation and is required in any event. Whilst the proposed allocation can make land available for this use, the delivery mechanism will need to be discussed with the Council reflecting its wider role and purpose.
- 3.62 **Extra Care.** As is explained in the supporting text to Policy HP8, there is an identified need for elderly persons and specialist housing provision. This type of provision extends more widely than Extra Care. The Background Paper entitled *Specialist Housing* draws the overarching conclusion that "*there is a shortfall of 'housing with care; - accommodation which allows older people to live independently with access to care and support – rather than a shortfall of any specific model*". (Para 2.22 refers)
- 3.63 In effect, a flexible approach is required at this stage. Accordingly, we believe the policy requirement in this instance should be broadened to allow this wider definition of housing – comprised of both C2 and C3 accommodation - to be provided. Moreover, as is suggested in the Background Paper certain of the specialist housing is required as part of the affordable housing



element and could contribute to the overall proportion that is sought.

Self and Custom Housing

- 3.64 Policy HP9 requires 10% of all dwellings on sites of 40 or more to be provided as plots for sale to address local self or custom build. It is instructive that this proportion has not changed between the 2020 Plan and the current plan yet the overall amount of new housing to be provided has increased (i.e. the total number of self or custom build houses provided under Policy HP9 would now be greater). The addition of new allocated sites increases the number of self or custom build by 261, of which 125 would be provided at HA55. It is not obvious how the evidence supporting the principle of self or custom build houses has changed to justify the increase in provision by the application of a constant %.
- 3.65 The Background Paper entitled *Self or Custom Build* suggests that for a three year period since 2016 the average register list was 41. On the basis that this remains similar over the 16 year plan period that amounts to a demand for circa 200 self or custom build houses.⁴
- 3.66 On this basis, the total potential supply of self or custom build is significantly greater than that level of demand.
- 3.67 Moreover, it is not obvious that 125 self or custom build houses concentrated in a single location in fact reflects the evidence.
- 3.68 For these reasons, and reflecting the fact that a lower proportion of self or custom build housing is required at Welborne because of its overall scale, we propose that a specific criterion as applied to HA55 seeking 3% of the total number of new homes to be provided as self or custom build. This would be broadly equivalent to one delivery period.

Alternative Policy Wording

- 3.69 In the context of the preceding paragraphs we have prepared the following alternative policy wording which we consider better meets the requirements of paragraph 16(d) of the NPPF.

Within the area identified South of Longfield Avenue, a mixed-use development will be delivered that meets the following site-specific requirements:

- a. delivery of 1,250 dwellings of which 40% shall be affordable housing in accordance with Policy HP5;*
- b. specialist elderly persons care accommodation of between 50 – 100 units;*
- c. residential densities shall reflect the existing character of the Site's surroundings with an average range of between 30 and 50 dwellings per hectare to reflect the predominant mix of family sized homes;*
- d. development to be located to the north and east of the site in order to respect the landscape sensitivity of the wider site and to retain undeveloped land between Fareham and Stubbington*

⁴ 16 year plan / 3 year delivery period = 5 periods * 40 per period = 213



- e. *the creation of accesses for pedestrians, cyclists, public transport and vehicles from Longfield Avenue and Peak Lane with additional sustainable transport improvements to off-site routes to the town centre, bus routes and other local destinations;*
- f. *provision of a new 2-form entry primary school on site;*
- g. *provision of a mixed-use local centre providing flexible commercial floorspace (c.1500sq.m) to meet the day to day needs of the neighbourhood, together with a healthcare facility and community space;*
- h. *land for a sports hub to provide new playing pitches and associated facilities to meet existing and future demands;*
- i. *a network of green infrastructure that will:*
 - *provide a new landscaped edge to the north of Stubbington bypass to mitigate the visual impact of new development in important views*
 - *conserve the landscape setting of Peak Lodge to protect its residential amenity*
 - *strengthen boundary planting adjacent to HMS Collingwood*
 - *establish new ecological habitats and achieve a biodiversity net gain*
 - *mitigate the increased recreational pressure on nearby sensitive wildlife sites*
 - *provide a new linear parkland or equivalent area of multifunction greenspace*
- j. *Land west of Peak Lane shall be laid out to provide informal recreational space and Solent Wader & Brent Goose Habitat to mitigate the effects of the development in accordance with policy NE3 and Policy NE5*
- k. *Further infrastructure improvements will be delivered in accordance with an Infrastructure Delivery Plan; and*
- l. *provision of 3% self and custom build houses.*

A Site Wide Masterplan that reflects the principles of the Local Plan's Illustrative Land Use Framework shall be prepared collaboratively between the applicant and the Council and development proposals shall be consistent with this. A Design Code shall also be required as part of the development process.

- 3.70 These amendments are considered necessary to ensure that the policy is *positively prepared, justified, effective and consistent with national policy*, and thus in accordance with the tests of soundness required by the NPPF (para 35).



Land Use Framework Plan

- 3.71 In broad terms we support the Illustrative Land Use Framework Plan on page 148 of the consultation document in how it interprets the spatial aspects of the development criteria, but would draw attention to the following considerations.
- 3.72 It identifies areas of land for *green infrastructure* which are outside of the area of the allocation shown in the preceding page of the consultation document:
- land south of the Stubbington Bypass which is associated with Housing allocation HA54 and not this proposed allocation, and
 - existing areas of amenity space at Bishopsfield Road, Lasham Walk and Dunstable Walk which are associated with existing housing.
- 3.73 We consider this to be a graphical error but could be wrongly interpreted as being areas of green infrastructure associated with future development proposals pursuant to the allocation.
- 3.74 The NPPF requires that the design of new places and buildings should be *inter alia* grounded in an understanding and evaluation of each area's defining characteristics. This underscores the importance of the masterplanning process being allowed to fully explore how best to arrange new development and associated uses in the context of the wide range of planning objectives listed in paragraph 130 of the NPPF to strike the appropriate balance.
- 3.75 In this context, the Illustrative Land Use Framework Plan should not be afforded a status that predetermines the masterplan process. Reflecting its indicative nature, the extent of the developable area shown by the solid colour block and the flexible development edge, should only be seen in that term and should not be interpreted as definitive. To do otherwise, could present an unnecessary risk to the ability to achieve the various development requirements, and the ability to adapt through the masterplan process should not be undermined.
- 3.76 For example a relevant considerations in the masterplanning process will be the predominant character of the existing urban environment which is two storey housing; only along Bishopfield Avenue is there more dense flatted accommodation. Equally, evidence of housing mix at *Appendix 4* suggests that the proposed development will need to be primarily for family housing. The masterplanning process must be able to achieve these legitimate planning objectives without being fettered by the a Illustrative Land Use Plan.
- 3.77 As indicated in paragraph 3.69 we have proposed to amend the manner in which the Illustrative Land Use Framework Plan is referred to. This amendment is considered necessary to ensure that the policy is *positively prepared, justified and effective*, and thus in accordance with the tests of soundness required by the NPPF (para 35).

Trajectory

- 3.78 The outline planning application submitted in 2020 referred to a construction programme extending from 2022 to 2036 as a basis for the Environmental Impact Assessment. To deliver 1250 new homes within the plan period would require some 125 houses built per annum over a ten-year period. This is both achievable and credible and represents half of the realistic build rate suggested for Welborne.

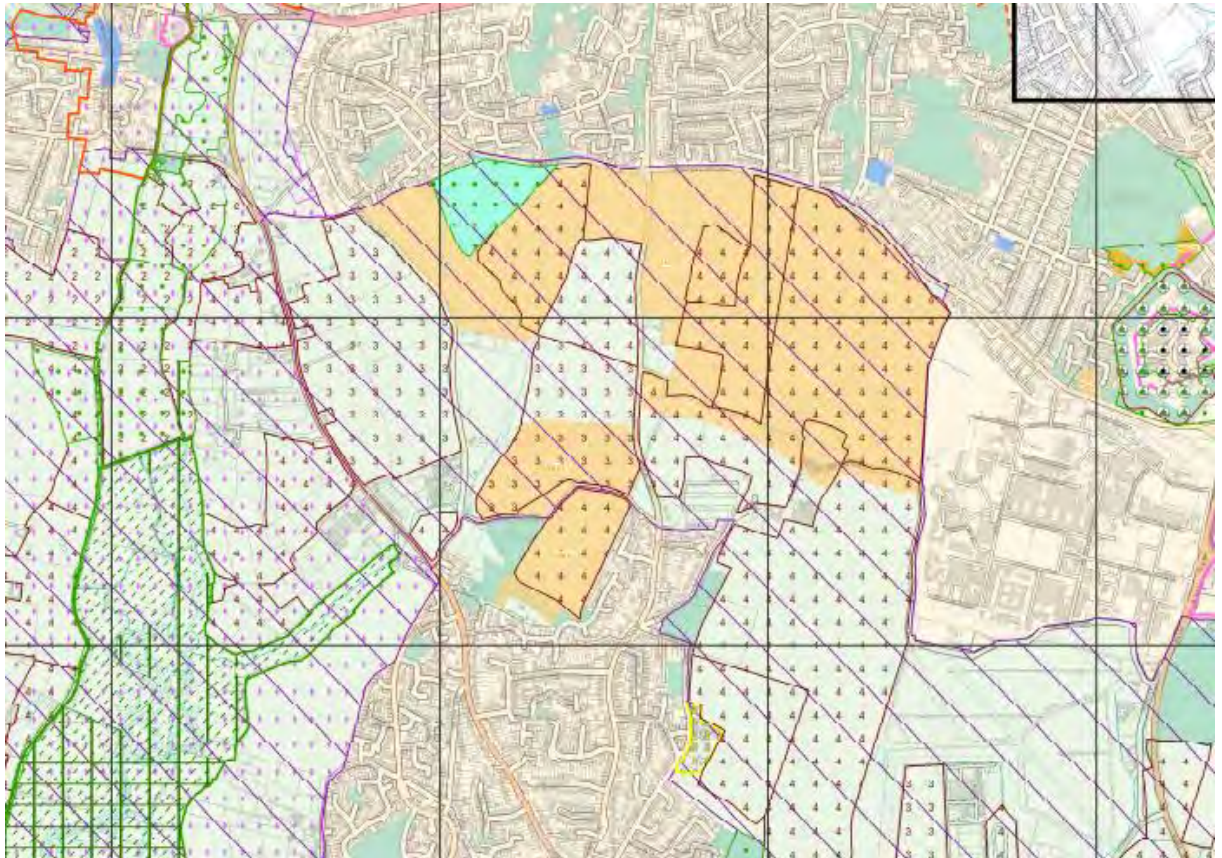


- 3.79 At the present time it is anticipated that outline planning permission could be granted in 2022, reflecting the fact the current application is likely to be amended to reflect Policy HA55. Allowing for a further two-year period to address planning conditions and reserved matters approvals for an initial phase, development would commence in 2024. Assuming the build rate averaging 125, development would be complete within the plan period. There is strategic infrastructure required to enable development in this location.



4 Policies Map

4.1 An extract from the consultation document's Policies Map is included below.



4.2 We have two comments to make in relation to this:

Delineation of the Strategic Gap

4.3 The blue diagonal hatch illustrates the land that is subject to the Strategic Gap Designation, which, as can be seen, extends across the area of land identified as HA55. There are two observations to make in relation to this.

4.4 Firstly, there is an unnecessary conflict between land being shown on the Policies Map both as a major housing allocation and subject to specific provision in Policy HA55 and at the same time the requirements of the Strategic Gap policy. The *Technical Review of Areas of Special Landscape Quality and Strategic Gaps* draws the significant conclusion that development in this location can be accommodated without significant adverse effect on the function of the Strategic Gap. It follows that this land is not an integral part of the Fareham and Stubbington Gap.

4.5 Put simply, such a designation should not include more land than is necessary to achieve its



purpose. As such the Strategic Gap should not extend across this land, as this would add a policy restriction that ought not apply on the basis of the published evidence.

- 4.6 Secondly, the Plan is inconsistent in how it is delineating allocations within the Strategic Gap. Also shown on the extract is the proposed allocation at HA54 (land east of Crofton Cemetery and west of Peak Lane). Whilst the Inset Map (no.10) published in the adopted Local Plan Part 2 Development Sites and Policies includes this land within the Strategic Gap, on the extract it is proposed to amend the boundary of the designation to exclude this future development site.
- 4.7 For these reasons, and for the Local Plan to be justified, and to be sound, the delineation of the Strategic Gap south of Fareham should be amended to exclude the proposed allocation HA55. This amendment is considered necessary to ensure that the policy is *positively prepared, justified* and *effective*, and thus in accordance with the tests of soundness required by the NPPF (para 35).

Southern extent of the allocation

- 4.8 East of Peak Lane, the southern extent of the allocation extends south of Tanners Lane. Tanners Lane represents an entirely appropriate southern extent, particular where any boundary beyond that is only partially provided by the Stubbington bypass and otherwise crosses through an open field. The Policies Map should be amended to accord with *Appendix 3*. This amendment is considered necessary to ensure that the policy is *positively prepared, justified* and *effective*, and thus in accordance with the tests of soundness required by the NPPF (para 35).



5 Summary

- 5.1 These Representations have been prepared on behalf of Hallam Land Management Limited (Hallam), who control a substantial tract of land to the South of Fareham, south of Longfield Avenue, west of HMS Collingwood and adjoining the Stubbington Bypass, the construction of which has recently commenced and is due to be open in Spring 2022.
- 5.2 In successive representations to the Local Plan Review we have drawn attention to the merits and advantages of locating development to the South of Fareham and how this would achieve the Borough Council's objective of *Good Growth*.
- 5.3 In this Revised Regulation 19 Plan, Policy H1 has rightly been amended to accord with the Government's Standard Method for calculating local housing need as required by the NPPF. As a matter of principle, we agree with this approach.
- 5.4 For various reasons set out herein, it is right that Policy H1 is framed in the terms "at least 9,560 new homes" as this is the minimum justifiable amount of new housing needed in the Borough.
- 5.5 Whilst additional housing allocations have been proposed, it remains the case that the Plan's housing supply strategy provides very little flexibility to deal with different circumstances that might arise to those assumptions that it is based upon. This underscores the need for the additional housing allocations as a matter of principle and for them to be delivered with alacrity.
- 5.6 Policy H1 includes as an additional proposed allocation land south of Longfield Avenue to provide 1250 new homes and associated uses. Hallam control the overwhelming majority of the site area shown on the Plan on page 146 of the consultation document.
- 5.7 This land was previously identified in the 2020 Local Plan Supplement as a potential Strategic Growth Area. Whilst the 2020 Regulation 19 Plan did not carry this forward because it proposed a lower level of housing, this allocation is a continuation of that earlier approach and the assessment work undertaken at that time. Importantly, this proposed allocation is entirely consistent with and supports delivery of the Plan's Vision, Strategic Priorities the Development Strategy.
- 5.8 It is evident from the above that development in accordance with Policy HA55 would deliver positive social and economic benefits. As is often the case, there are, conversely, negative environmental effects associated with greenfield development. Importantly, as the Sustainability Appraisal and Habitats Regulations Assessment both acknowledge, mitigation measures will be achieved either by embedded elements in the scheme or by measures secured pursuant to other Local Plan policies that will minimise these potential negative effects.
- 5.9 Policy HA55 lists site-specific requirements that development proposals should meet. It is important to recognise that these criteria will be those that are used to assess future development proposals at the Development Management stage. In this regard, we are mindful of the requirement in paragraph 16(d) of the NPPF for policies "to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".
- 5.10 In the context of comments on various of the Policy's criterion we have prepared alternative policy wording which we consider better meets the NPPF's requirements whilst retaining the



thrust of the policy's intended outcomes.

- 5.11 Whilst we support the inclusion of an Illustrative Land Use Framework Plan on page 148 of the consultation document, our representations have drawn attention to important considerations; firstly, the extent of green infrastructure not related to the development proposals, and secondly, the potential constraint in achieving the overarching policy requirement of 1250 new homes and associated uses by the way the developable area is delineated.
- 5.12 Finally, the delineation of the Strategic Gap south of Fareham should be amended to exclude the proposed allocation HA55. The southern boundary of the allocation should be drawn at Tanners Lane, rather than extending south and across open fields.

LRM Planning Limited
29th July 2021



Appendix 1: Schedule of Representations Submitted to 2020 Regulation 19 and current status

2020 Regulation 19 Plan Reference	Summary of Representations	Present Status
The Vision	The Plan overall is not Positively Prepared. The approach to housing was not aligned with the Vision where the need for new homes would be addressed. Housing supply assumptions misjudged likely delivery. Sub-regional role of Fareham not properly acknowledged.	The use of the Government’s Standard Method as the basis of local housing need and Policy H1 is welcomed; this is better aligned with the Vision and leans more towards a positively prepared plan. Representations in relation to Policy H1 herein explain why this is the minimum level of provision and also why supply assumptions remain an important consideration in ensuring that the housing strategy and Vision are suitably aligned.
Strategic Priorities	The Plan overall is not Positively Prepared. The approach to housing was not aligned with the Plan’s Strategic Priority where the need for new homes would be addressed. Housing supply assumptions misjudged likely delivery. Sub-regional role of Fareham not properly acknowledged.	The use of the Government’s Standard Method as the basis of local housing need and Policy H1 is welcomed; this is better aligned with the Plan’s Strategic Priorities and leans more towards a positively prepared plan. Representations in relation to Policy H1 herein explain why this is the minimum level of provision and also why supply assumptions remain an important consideration in ensuring that the housing strategy and Vision are suitably aligned.
Development Strategy	Good Growth	No further comments – the proposed allocation of land south of Longfield Avenue (HA55) would contribute to <i>Good Growth</i> .
	Landscape and Countryside	No further comments – the proposed allocation of land south of Longfield Avenue is consistent with the Council’s evidence which identifies the most sensitive landscape areas.
	Settlement Boundaries	No further comments – the proposed allocation of land south of Longfield Avenue will require the settlement



		boundary on the Proposals Map to be amended.
	Settlement Identity	See representations in the relation to the delineation of the Strategic Gap in Section 4.
	Climate Change	No further comments
	Protected areas for nature conservation	No further comments
	Transport corridors and opportunities to encourage more active travel	No further comments
	Need to encourage diversity in the housing market	No further comments
	Sustainability and accessibility to services	No further comments
	Requirement to meet housing and employment needs	See comments in respect of Policy H1
	Spatial Interpretation	See comments in respect of Development Strategy in Section 3
Policy DS1	Development in the Countryside – Criterion v Best and Most Versatile Land	Representation remains as no change proposed to the wording of the Policy.
Policy DS2	Development in Strategic Gaps	Policy HA55 now allocates land to the South of Fareham but does not amend the extent of the Strategic Gap in this location. See representations at Section 4.
Policy DS3	Landscape	No further comments
Policy H1	Housing	Previous comments to be read in the conjunction with Section 2 herein. The use of the Government's Standard Method as the basis of local housing need and Policy H1 is welcomed and leans more towards a positively prepared plan. Representations explain why this is the minimum level of provision and also why supply assumptions remain an important consideration in ensuring that the achievement of Policy H1.
Omission of land south of Fareham		Previous comments to be read in conjunction with Section 3 which allocates land in this location as Policy HA55.
Policy NE5	Delineation of Brent Goose and Wader Bird classification.	No further comments



Appendix 2: Suggested Design Code Structure

Land south of Longfield Avenue Masterplan and Strategic Design Code Skeleton

- 1. Introduction –**
 - a. Background – Local Plan proposed allocation HA55
 - b. purpose of the Masterplan and Strategic Design Code
 - c. content and structure

- 2. Context -**
 - a. the location of the development and the attributes of its immediate and, local surroundings
 - b. baseline characteristics – environmental considerations
 - c. an understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments.

- 3. Vision and Identity –**
 - a. The place we aspire to create

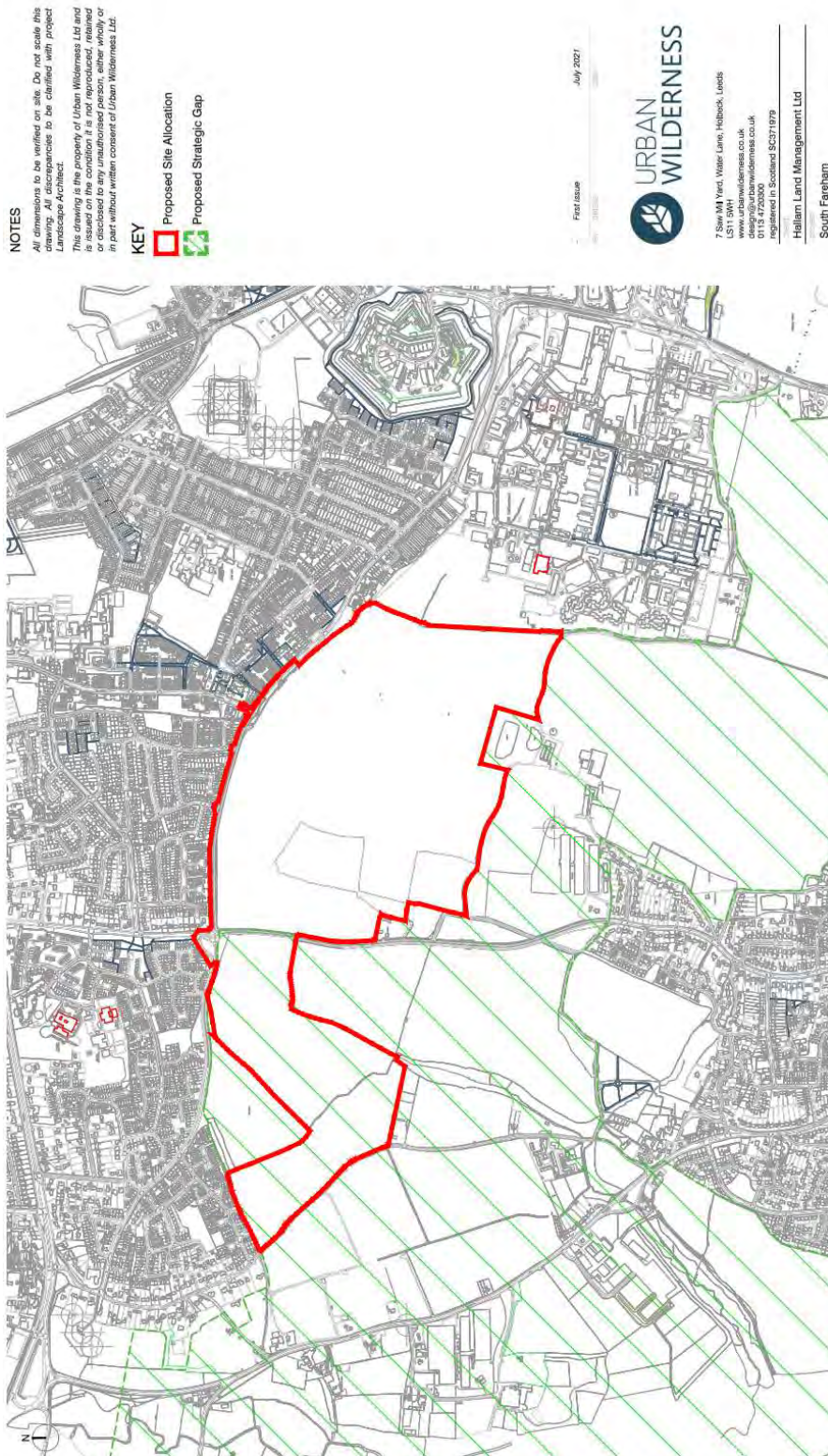
- 4. Place making strategies**
 - a. Built Form
 - b. Movement
 - c. Nature
 - d. Public Spaces
 - e. Uses
 - f. Homes and Buildings
 - g. Resource efficiency and resilience
 - h. An enduring place – governance and stewardship

- 5. Whole Site Framework Masterplan – spatial information**
 - a. The landscape strategy
 - b. The amount and positioning of open space
 - c. The number of homes and other uses
 - d. The points of access and connection to the wider street network
 - e. The primary and secondary streets
 - f. The position of the local centre and primary school
 - g. The area types that will apply to different parts of the site

- 6. Strategic Design Code**
 - a. Developing the area typologies
 - b. Defining the key parameters (the rules rules on density, height, street building line etc)



Appendix 3: Alternative Plan





Appendix 4: Housing Mix

1. Germane to the form and density of the development is the housing mix that should be delivered from this proposed allocation. In the following paragraphs we consider the various assessments of housing mix to understand its implications as to the nature of the proposed development.

Strategic Housing Market Assessment

2. The 2016 Strategic Housing Market Assessment records various estimates of the necessary future housing mix. For Fareham East this proposes the following:

	1 bed	2 bed	3 bed	4 bed
Affordable	51.0%	31.1%	16.5%	1.5%
Market	12.3%	40.6%	44.4%	2.8%

3. For the HMA as a whole this is expressed in the following terms:

	1 bed	2 bed	3 bed	4 bed
Affordable	35-40%	30-35%	20-35	5-10%
Market	5-10%	30-35%	40-45%	15-20%

4. Assuming this mid-point for each of these and applying this to the proposed number of new homes, the mix would suggest the following:

	1 bed	2 bed	3 bed	4 bed
market	56	244	319	131
affordable	188	163	113	38
Total	244	406	431	169

5. Paragraphs 9.4.0 and 9.4.1 provide important context in interpreting these figures.

"Our strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households. It is however important to recognise that smaller properties (i.e. one bedroom homes) typically offer limited flexibility in accommodating the changing requirements of households which can feed through into high turnover". (Para 9.40)

"In the market sector, we would expect the focus of housing need to be on two and three-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2 and 3 beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay."



Market evidence

6. Market facing assessments suggests demand for the following mix:

	1 bed	2 bed	3 bed	4 bed
Market facing assessment	5	25-30	40-45	25-30

7. In comparison with the SHMA, this indicates a greater demand for 4 bed properties and less for 2 bed properties. However, for the purpose of the assessment herein we have employed only the SHMA figures.

Affordable Housing Provision

8. More recently, the Council's Affordable Housing Strategic Lead provided the following response to the submitted planning application:

"Fareham South is one of our higher areas of affordable housing need in the Borough. In terms of the starting point for the mix I would expect the Social/Affordable Rent to sit at approximately 35% 1 bed, 20% 2 bed, 40% 3 bed and 5% 4 bed....Other points of note:-

- *The 2 beds should include a good proportion of 4 person 2-bed housing (as opposed to predominantly flats)*
- *Within all property sizes there should be a range on m² to include the larger of each type (i.e. 4bed 6 person etc.)*
- *Affordable housing should be appropriately distributed in small cluster, in particular 1-bed flats should be carefully considered so as to avoid excessive concentration of this property type.*

The affordable home ownership products (shared ownership etc) are less prescriptive as this is partly market driven. As an indication the mix should include 20-25% 1-bed, 45-55% 2 bed, 25-35% 3 bed and 0-5% 4bed."

A blended approach

9. Applying the above SHMA assumption for market housing and the advice of the Council's housing officer in respect of affordable housing, a blended approach yields the following:

	1 bed	2 bed	3 bed	4 bed	
market	56	244	319	131	750
affordable social/affordable rent	114	65	130	16	325
affordable home ownership	38	85	50	3	175
	208	394	499	150	1250
%	17	31	40	12	

10. The above analysis points clearly to family housing being the predominant housing type required:

- Nearly twice as many 2 bed houses are suggested as opposed to 1 bed
- The 2 bed houses should, in the main, comprise houses, rather than flats



- 3 and 4 bedroom houses amount to over half of the new homes

11. In turn, this contributes to the character of the proposed development and it being a neighbourhood for new families. We have proposed an amendment to Policy HA55 to reflect this.

12. If the market facing demand indicator was employed this would further emphasize the family housing nature of the proposed development.

Respondent: Mr Joe Maphosa (307-511857)

Legally compliant	Yes
Sound	No
Complies with the duty to co-operate	Yes

Please provide details you have to support your answers a...

The current policies map does not recognize Burr ridge as a settlement despite its significantly built-up nature similar to the settlements of Hook & Chilling and equally Funtley which are identified as settlements in their own right despite being similar or smaller in size in comparison to Burr ridge.

What modification(s) is necessary to make the Revised Pub...

The inclusion of a settlement boundary for Burr ridge.

How would the modification(s) you propose make the Revise...

The proposed modification would make the plan sound by reflecting a Justified approach.

Your suggested revised wording of any policy or text:

Include a settlement boundary for Burr ridge.

If your representation is seeking a modification to the P...

Yes, I want to take part in a hearing session

Please outline in the box below why you consider it neces...

The matters raised by our representation have significant implications for the plan and require significant discussion at EiP.
