

Our Ref: 5372

Your Ref:

8th January 2015

Claire Jones-Hughes
Banks Solutions
% 6 Brading Road
Brighton
BN2 3PD

Email: jb@alliance-plan.co.uk
sc@alliance-plan.co.uk

Via Email (bankssolutionsuk@gmail.com) and postal hard copy.

Dear Claire

RE: Fareham BC Development Sites & Policies: Actions Arising From Hearings

Response to the Council's Additional Work and Responses to the Inspector's Requests Made at the Hearing Sessions: Specifically Document DCD-24 - Actions Arising Issue 7

On Behalf of Stone Falconer Ltd (Respondent Ref.: DREP/395).

This letter comprises a further formal written submission, prepared on behalf of our client, Stone Falconer Ltd, relating to the content of the Council's additional work and responses to the Inspector's requests made at the recent Examination Hearing Session – specifically the matters of Issue 7 and the content of document ref. DCD-24.

Please note, this submission should be read in parallel with the content of our client's preceding formal written submissions dated April 2014 and October 2014.

Paragraphs 4.1 and 4.2

Our client remains concerned by the Council's confidence in the ability of LP2 to deliver sufficient housing to meet the objectively assessed housing needs of the Borough in regard to both 5-year housing land supply and the housing needs of the overall Plan period.

Paragraph 4.3

We support the Council's acceptance that the wording of Core Strategy Policy CS6 conflicts with the wording of the NPPF in that as originally drafted it failed to provide sufficient flexibility to adapt to rapid change, e.g. reliance on a finite supply of urban area sites is not sufficiently flexible in relation to dealing with unforeseen changes in the delivery and supply of housing.



Paragraphs 4.4 – 4.6

In principle, the Council's proposal to modify the flexibility of the approach in LP2 regarding the delivery of housing, including amendments to Policy DSP40: Housing Allocations and its supporting text is fully supported.

We are however concerned by the mechanism which has been recommended by the Council to achieve this. In summary, the proposed amendment comprises a criteria based approach whereby in the event the Council is unable to demonstrate that it can meet five year housing land supply targets (against the Core Strategy (LP1) targets) proposals for additional sites outside the urban area boundaries will be considered. Such sites being required to meet the following criteria of the proposed amendments to Policy DSP40:

- The proposal is relative in scale to the demonstrated 5 year housing land supply shortfall;
- The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;
- The proposal is sensitively designed to reflect the character of the neighbouring settlement to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;
- It can be demonstrated that the proposal is deliverable in the short term; and
- The proposal would not have any unacceptable environmental, amenity or traffic implications.

As the Inspector will no doubt appreciate, it is the consequence of the first criterion's future application which raises concern, e.g. '...relative in scale to the demonstrated 5 year housing land supply shortfall'.

By way of simple example, in the event the Council accepts the future identification of a 5 year housing land supply shortfall of 50 units this criterion would limit alternative sites coming forward to those which are of a 'relative scale', e.g. 50 units. This approach would preclude the delivery of a site which could have larger development potential and where such a site could be more sustainable and offer greater potential for the delivery of much needed affordable housing, etc., than other sites which although they may be of a relative scale are only capable of delivering comparatively less sustainable development. It is also conceivable that this criterion will encourage sites to come forward in a piecemeal fashion to the detriment of achieving comprehensive and efficient delivery of a site's overall development potential. Clearly this would be contrary to both the underlying policies and objectives of the NPPF and the principles of good planning in its simplest form.

In addition, this mechanism also has the potential to generate a significant degree of uncertainty in the planning process given the scale of under provision has the potential to swiftly fluctuate. The effect of which being that the relative scale of undersupply could increase and decrease between given moments of time during the lifetime of the LP2 plan period and indeed during the consideration period of a specific planning application itself.

We would therefore suggest that in seeking to provide more flexibility within the wording of Policy DSP40 and its supporting text this could be achieved without the inclusion of the Council's overly restrictive first criteria that requires development to be relative in scale to an identified 5 year housing land supply as proposed.

If you would like to discuss any aspect of this further submission or require additional information, please do not hesitate to contact either myself, or my colleague, Stuart Crickett by email (addresses are at the top of page 1 of this letter) or tel. 01483 579 098.

Yours faithfully

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

Jim Bailey
Director
Encs.