

FAREHAM LOCAL PLAN PART 2: THE DEVELOPMENT SITES AND POLICIES PLAN**Issue 7: Housing Allocations including Alternative Sites for Consideration (DSP40)****Actions arising from Hearing Session (December 2014)****RESPONSE TO COUNCIL'S COMMENTS (DCD-24)****Prepared by Barton Willmore on behalf of Hallam Land Management (HLM)**

This statement is submitted to the Examination into the Fareham Local Plan Part 2: Development Sites and Policies (LP2) (June 2014) ('the Examination') on behalf of Hallam Land Management Ltd (HLM). This statement addresses the Council's response to actions identified by the Inspector during the hearing session for Issue 2: The Existing Settlements (contained within document DCD-20).

Specifically, this statement considers the Council's response to the following action items:

- 1. Council to confirm with PUSH the timescale for delivery of the review of the South Hampshire Strategy;*
- 2. Council to explain the content of the 2014 PUSH SHMA, the weight that has been attached to it and the implications for LP2.*

HLM has no further comment to make in respect of items 3 (relationship between housing at Welborne and the rest of the Borough), 4 (approach to increasing flexibility through the rewording of Policy DSP40), 5 (Fleet End Road housing site), 7 (use of Croft House, Redlands Lane), 8 (Heath Road), 9 (delivery of Town Centre redevelopment sites), 10 (approach to self build and the wording of paragraph 5.181).

We consider items 1, 2, 3 and 6 individually below.

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

The Council's response to this request is set out at paragraph 1.1 of document DCD-24. The Council states that the most up-to-date timescale for the delivery of the South Hampshire Strategy Review is set out in the report to the 23rd September 2014 PUSH Joint Committee. This Committee Report advises that the evidence review will commence in May 2014 for a period of 8 weeks leading into a public consultation on the options in July/August 2015. The Council envisaged that consultation on the draft Strategy, final amendments and adoption of the document will occur in early 2016.

Whilst we note the timetable set out within the 23rd September Committee Report, we consider this timescale to be somewhat ambitious and one which should be treated very much as a 'best case' scenario in light of the review process required following the options consultation and the requirement to engage effectively with various authorities, which could inhibit the delivery of the strategy within the proposed timescales.

As set out within our hearing statement and as emphasised at the hearing session for Issue 7, should LP2 be found sound and the requirement for an early review of the Plan with specific regard to the proposed housing figures adopted as policy within the Plan, such a policy **must** set out clear details of when the review will be undertaken and a framework for how it will be reviewed. This will ensure that there is an effective mechanism in place to enable Fareham Borough Council to deliver Fareham's forecast housing needs across the Plan period. Whilst the Plan may not necessarily be the most suitable or effective approach to revisit these housing figures, there is a requirement on Fareham Borough Council to ensure that the plan is subject to on-going monitoring and review to ensure that the spatial location of new housing is planned for appropriately, and at the correct time.

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

We have considered the Council's response to this action item, as set out at paragraphs 2.1 - 2.9 of document DCD-24. We note the comment at paragraph 2.5 that the SHMA analysis provides a 'starting point' for ascertaining the level of required housing growth across the PUSH area, with the final distribution decided at a local level through dialogue between the authorities within the PUSH Partnership, which is to take place through a comprehensive review of the PUSH South Hampshire Strategy.

Paragraph 2.6 notes that '...the 2014 SHMA is considered to represent the most up-to-date objectively assessed housing needs evidence.' Paragraph 2.8 goes on to explain that the Council has fully considered the SHMA, but 'very little weight' has been attached to the findings at this stage on the basis that it is only a 'starting point' and so to place weight on it would be 'premature.' Paragraph 2.8 goes on to confirm that the primary purpose of LP2 is to complete the Local Plan, not to review housing requirements as these have already been set by the Core Strategy.

HLM's position in respect of the SHMA and the implications for LP2 are set out in detail within the submitted hearing statement for Issue 7 and as such it is not necessary to repeat those again here. To summarise, our understanding of the legal position is that ultimately no statutory requirement exists to undertake a review of housing needs now and we acknowledge that the SHMA figures must only be considered as a starting point. That said, we are of the view that it would be unwise to proceed with LP2 as it stands and on the basis of outdated evidence regarding housing need: it is likely to render housing policies in the plans, with immediate effect, upon adoption, 'not up to date' (paragraph 49 of the Framework). HLM consider that ultimately LP2 fails to demonstrate how the full housing needs of Fareham will be met and in this respect it is **unsound** (albeit potentially lawful). We submit that there is a difference. Regardless of whether or not the approach to LP2 in failing to review housing needs is considered permissible in *legal* terms, to proceed with the plan on the basis of an outdated evidence base seems perverse and completely at odds with positive and proactive planning.

Barton Willmore has produced an Open House Assessment which sets out our position in respect of the objectively assessed needs issue. This is contained at Appendix 2 to the Issue 7 hearing statement. HLM remain gravely concerned that in respect of development needs LP2 fails to meet the requirements of the NPPF or the PPG, and that the Plan is unsound on this basis. Our concerns notwithstanding the legal intricacies largely relate to the need for the Council to plan appropriately to meet the shortfall of housing against its objectively assessed housing requirements in line with the requirements of the NPPF. The Council must provide sufficient housing to support future population growth, and as it stands, HLM has significant concerns that the Council is not doing so.