



Fareham Local Plan 2037
Revised

**Representations to
Windfall Analysis Update
July 2022**

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Prepared on behalf of Raymond Brown Rookery Properties

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1.0 Introduction

- 1.1 These representations have been prepared by Southern Planning Practice Ltd (SPP) on behalf of Raymond Brown Rookery Properties who own land at Rookery Farm, Botley Road, Swanwick which was proposed to be allocated as a residential development site in the Supplement to the Draft Local Plan in January 2020; however, it was subsequently removed as an allocation from the Regulation 19 Submission Version of the Local Plan.
- 1.2 These representations are made in respect of the Windfall Analysis Update (FBC077) which has been produced by Fareham Borough Council following the Local Plan Hearings in March 2022 and in response to the Inspector's Post Hearing Letter in dated 6 June 2022. The Inspector has invited representations on three topic papers produced by the Council namely this paper: FBC077: Windfall Analysis Update as well as FBC090 Revised Housing Supply and FBC089: Revised Affordable Housing Background Paper. Separate papers have been prepared by SPP in respect of each of these topic papers and together form the further representations by SPP on behalf of Raymond Brown Rookery Properties to this focussed consultation.
- 1.3 Representations have been made on behalf of our client, Raymond Brown Rookery Properties throughout the preparation of the emerging Local Plan. We also represented our client at the Local Plan Examination Hearings in March 2022. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan or the Matter Statements prepared for the hearings, this statement draws on previous responses where necessary.
- 1.4 We request to participate in any further hearing sessions which may be held as part of the Local Plan Examination.
- 1.5 Notwithstanding the new evidence produced by the Council, it is our continued view that the draft Plan remains UNSOUND for the reasons outlined in each of the papers.

2.0 Windfall Analysis

- 2.1 We note that the updated supply position also reflects the updated windfall rates, as set out in FBC077. The information presented is largely factual but is not particularly straightforward to understand in terms of why sites are included in the table but then excluded from the windfall analysis and the time periods over which the analysis has been undertaken.
- 2.2 We would particularly like to highlight that the Council appears to have included permissions for domestic annexes and ancillary outbuildings to the windfall results. There are over 30 annexes or outbuildings included. We would question the reasons for their inclusion as most of these permissions are controlled by condition to ensure that their use remains ancillary or incidental to the residential use of the main property. They are not therefore creating a new 'market' dwelling.
- 2.3 We would be grateful for further clarification in this regard as their inclusion would potentially show a higher result than would otherwise be the case, and therefore would affect the reliance that can and should be made on windfall sites as a source of the overall housing supply figures moving forward.