



# Fareham Local Plan Examination

## **Matter 2 Hearing Statement**

February 2022



[gladman.co.uk](http://gladman.co.uk)



01260 288888

**Page intentionally left blank**

## MATTER 2: DEVELOPMENT STRATEGY

Q5 Will the settlement boundaries, combined with other policies and allocations, enable the Plan to meet the need for housing and employment whilst providing sufficient flexibility to adapt to change?

- 1.1.1 Firstly, Gladman are receptive to criterion e) of Policy DS1 which confirms that housing development outside of the settlement boundaries and in compliance with Policy HP4 (Five Year Housing Land Supply) will be supported. This gives the Plan a degree of suppleness to respond to any identified housing land supply shortfall.
- 1.1.2 Nonetheless, we remain concerned that the use of defined settlement boundaries acts as little more than an arbitrary tool to prevent otherwise sustainable proposals from going forward. The policy wording as currently drafted only allows for development in a narrow set of circumstances (i.e. replacement dwelling, previously developed land, tourism use etc.) and does not accord with the positive approach to growth required by the Framework which establishes a presumption in favour of sustainable development.
- 1.1.3 Through ongoing work on housing need and supply undertaken by Partnership for South Hampshire (PfSH), it is widely acknowledged that there is a significant quantum of unmet housing need in neighbouring authorities. Indeed, the latest SoCG details that the unmet need currently stands in the region of 13,000 dwellings and is likely to alter further as plan-making across the region progresses. Whilst the Plan makes a modest contribution to neighbouring unmet need, given there remains significant uncertainties in determining the wider unmet need Gladman contend that appropriate flexibility is required to ensure the Plan can respond expeditiously to any future apportionment of additional unmet housing need.
- 1.1.4 Resultingly, Gladman recommend that Policy DS1 is modified and worded more flexibly to ensure compliance with paragraphs 11 and 16(b) of the Framework and the requirement for policies to be sufficiently flexible to adapt to rapid change. The implementation of a criteria-based policy (as detailed in our Regulation 19 representation) would provide a more appropriate mechanism for assessing the merits of individual development proposed, based on their specific circumstances and ability to deliver sustainable development, rather than being discounted simply due to a sites location beyond an artificial boundary.

Q10 Is it clear to decision-makers, developers and local communities how proposals should demonstrate the requirement for a location outside of an urban area?

1.1.5 It is not clear within Policy DS1, nor the supporting text, how proposals should demonstrate the requirement for a location outside of an urban area, especially given any development proposals will be tested against all other relevant policies in the Plan. Consequently, to ensure Policy DS1 is clear and concise, Gladman suggest that this element of Policy DS1 should be removed unless suitable wording and justification is forthcoming from the Council.