

Examination of the Fareham Local Plan 2037

Hearing Statement: Matter 4 Housing Policies

Hallam Land Management Limited

This Hearing Statement has been prepared on behalf of Hallam Land Management Limited. Hallam submitted representations to various stages of the Local Plan during its preparation. In representations to the Revised Regulation 19 Plan which proposed the allocation of HA55, Hallam commented on the practical application of Policy HP9 in the different circumstances that now existed with the housing requirement having been increased and additional allocations having been proposed.

Policy HP9 Self and Custom Build Homes

Question 27. What is the current demand for self and custom-build housing in Fareham? How does Policy HP9 relate to the identified need?

1. The Council's website¹ indicates that at 30th October 2020 there were 143 person(s) on the self and custom build register.
2. This is comprised of 5 base periods between 2016 and 2020 and takes account of "*suitable planning applications granted*" (i.e., this is a net figure) but includes persons who may have removed themselves from the register (see para 5.4 of HOP004).
3. Across the five periods, the average number of "new entries" joining the register is 41 per annum.
4. Appendix 1 of HOP004 provides a degree of further information, noting that this is simply a snapshot in time: 79 people on the list at register at April 2019 were canvassed, of which 60 replied but only 56 confirmed that are still interested in pursuing a self or custom build plot. This suggests the register could be overestimating demand.
5. It is notable that Policy HP9 was not amended in the Revised Regulation 19 Plan despite that Plan increasing the housing requirement and supply of housing land. Had there been a genuine connection with the supply which Policy HP9 was seeking to secure, it is reasonable to expect the percentage in the policy to reduce.

¹ https://www.fareham.gov.uk/planning/local_plan/selfbuild.aspx

Question 28. What is the threshold of 40 or more dwellings based on, and what is the justification for requiring 10% of the dwelling capacity to be provided as self-build and custom build plots?

6. Paragraphs 5.12 – 5.14 provides the Council's justification for the approach in Policy HP9; this is referred to "*as an effective way of generating a significant number of plots for self and custom build properties where there is an established demand.*" This appears to be a rather blunt approach to secure supply without it necessarily being aligned with the evidence; the effectiveness of the Policy in actually providing a meaningful supply is therefore questionable.
7. It is instructive that there is no specific justification as to the threshold of 40 dwellings other than it ensures that self build will not be reliant entirely on windfall contribution.
8. Nor is there a justification as to the 10%.
9. Both the threshold and the percentage appear arbitrary figures.
10. Equally, this blanket approach does not appear to account for information expressed in applications to the *register* as to locational preference. Appendix 1 of HOP004 provides information in respect of locational preference, highlighting "*The west of the Borough is the area in which the majority of people would prefer to be located, in particular 50% of responses chose Warsash, 37.5% chose Titchfield and 27% Sarisbury*". In comparison, very limited interest in a property in Fareham South and Stubbington & Hill Head (page 14 refers).

Question 29. Is the requirement for plots to be marketed for 12 months justified?

11. No justification is provided as to the marketing period of 12 months although this is a provision we are familiar with elsewhere.
12. There is however a practical consideration for large sites that deliver housing on a phased basis over a number of years. In those instances, a legal agreement will need to take account of that circumstance.

Question 30. Bearing in mind the provision of custom and self-build homes on the Welborne Garden Village and the potential for windfall development, would the application of the policy result in an over provision? Has the potential delivery over the plan period been assessed against the potential need?

13. Based on the housing trajectory in FBC001 the application of Policy HP9 would appear to generate a supply of self and custom build houses in the order of 500. Of which, some 25% would be provided at HA55 to the South of Fareham.
14. This concentration of future supply in at one large development bears little relationship to the understandable locational preference for more rural locations and the very limited interest in Fareham South or Stubbington and Hill Head as a location. For example, the 125 new self build plots is a significant amount in its own right but is three times more than will be provided at Welborne over the plan period and twice as much as over the life of that development. There is no compelling evidence to support this approach,

15. For these reasons we have proposed an amendment to Policy HA55 that would take precedence over Policy HP9 a seek 3% of the number of new homes as self or custom build. That would equate to some 40 such plots which is similar to one years requirement and is a comparable level of supply to Welbourne over the plan period.

Question 31. Part c) of the policy requires design parameters to be in place. Is it clear who and when these parameters would be prepared and how they would relate to the wider site?

16. Those matters are not clear from the Policy nor the supporting text
17. We assume that where self or custom build plots are secured as part of larger developments there will be a planning condition requiring design parameters to be agreed with the local planning authority and that this would need to relate to the wider design considerations of the site and the development objectives of a wider scheme. We infer from the policy that these parameters would be set out in the first instance by the persons marketing the plot and that the persons acquiring the site would be responsible for complying with that through the approval of reserved matters.

Question 32. Is it clear to decision-makers, developers and local communities how the policy will be applied? Is it sufficiently flexible?

18. Paragraphs 5.71 – 5.76 explain how the policy will be applied.
19. There is a degree of flexibility in the policy provided in the final paragraph that serves to exempt particular types of housing; high density flatted development or specialist housing provision as an example. HA55 will provide both types of housing yet there is no obvious adjustment to the percentage requirement for that development; in practice a greater proportion still of the conventional houses would be provided as self and custom build to account for this.
20. There are other instances where a degree of flexibility would be appropriate, such a location and scale relative to evidence of demand.

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