

Fareham Borough Council Hearing Statement

Matter 4 – Housing Policies

Prepared on behalf of

Metis Homes

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1.0 INTRODUCTION

- 1.1 Tetra Tech Planning have been instructed by Metis Homes to participate in the Examination of the Fareham Local Plan 2037.
- 1.2 Metis Homes have an opportunity to bring forward development at Land to the Rear of 35 Burridge Road, Burridge, as identified on the plan attached at **Appendix A**. Metis Homes have previously made representations in response to the Regulation 19 Fareham Revised Publication Local Plan 2037 consultation (July 2021).
- 1.3 This Hearing Statement sets out our client's position in relation to Matter 4 of the Examination which relates to Housing Policies. Metis Homes' interest in this matter emanates from their interests in promoting for development Land to the Rear of 35 Burridge Road.
- 1.4 Careful consideration has been given to the Inspector's Matters, Issues and Questions (INSP004) and the relevant published examination material available on Fareham Borough Council's (FBC) Examination webpage, all of which has informed the contents of this Statement.
- 1.5 This Statement will expand on the points made during the Regulation 19 consultation in relation to policy HP2 and suggest that in order to make the plan sound, the wording of policy HP2 should be amended.
- 1.6 This Statement should be read alongside the Regulation 19 representation, as well as the separate Hearing Statements submitted in relation to Matter 2 (Development Strategy), Matter 3 (Housing Need and Supply), Matter 5 (Gypsies, Travellers and Travelling Showpeople) and Matter 7 (Housing Land Supply).

2.0 POLICY HP2

2.1 Policy HP2 relates to new small-scale development outside the urban areas. It states:

“New small-scale housing development outside the Urban Area boundary, as shown on the Policies map, will be permitted where:

- 1) *The site is within or adjacent to existing areas of housing; or*
- 2) *The site is well related to the settlement boundary; and*
- 3) *The site is within reasonable walking distance to a good bus service route or a train station as well as safe walking and cycling routes that connect to a local, district or town centre; and*
- 4) *It comprises development that does not adversely affect the predominant development form of the area, taking particular account of:*
 - a. *building line and scale of adjacent dwellings;*
 - b. *plot size and proportion,*
 - c. *site coverage/ratio,*
 - d. *space between dwellings,*
 - e. *landscape and views through to countryside beyond; and*
- 5) *It comprises development:*
 - a. *Of not more than 4 units; and*
 - b. *Where the design and external appearance of each dwelling is demonstrably different, unless a terrace or semi-detached form is appropriate; and*
 - c. *That does not extend the settlement frontage.”*

What is the justification for defining small scale as no more than 4 units?

2.2 Given the significant levels of unmet need across the South Hampshire region, the need to increase the buffer due to reliance on strategic sites (as explained in the Matter 3 Statement) and the constraints to the short-term supply of housing, the inclusion of an arbitrary limit of “*not more than 4 units*” under criterion 5a is not a justified approach. Criterion 4 is sufficient alone to prevent over-development of sites outside the urban areas.

2.3 Criterion 5a should be amended to a more appropriate limit, which we consider should be replaced with “*not more than 1 hectare*”. This would align with paragraph 69a of the NPPF which states that local planning authorities should “*identify, through the development plan...land to accommodate at least 10% of their housing requirement on sites **no larger than one hectare**; unless it can be shown,*

through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved” (emphasis added).

- 2.4 Amending the limit to one hectare would also align with policy HP6 which relates to exception sites. This policy permits entry-level exception sites suitable for first time buyers, inter alia, on sites less than one hectare. Amending the limit to one hectare would therefore ensure consistency across national and local policies and is considered a more justified approach.
- 2.5 The Plan acknowledges the NPPF paragraph 69a requirement and states that *“In order to support small sites, the Council proposes a specific policy to encourage small sites in sustainable locations in the Borough.”*¹ Yet the Plan is still only allowing for 9.4% of homes to be on sites of one hectare or less and policy HP2 in its current form is preventing such sites from coming forwards through the inclusion of an arbitrary limit of *“not more than 4 units”*, which is not a justified approach.
- 2.6 Moreover, the policy requires the design and external appearance of each dwelling to be *“demonstrably different”*, however this is highly subjective, difficult for the decision-taker to assess and unnecessary. Furthermore, this is not a requirement of NPPF paragraph 69a. We therefore suggest this requirement is removed from the policy.

On what basis has the requirement for the site to be within a reasonable walking distance to a good bus service been defined in paragraph 5.16 of the supporting text?

- 2.7 Supporting text² to the policy, specifically in relation to criterion 3, provides explanation behind what FBC considers sustainable and accessible. However, this does not properly take into account accessibility by means of cycling – it sets out the acceptable walking distances but not cycling.
- 2.8 The National Model Design Code states that *“Coding should reflect the aim that walking and cycling should be the first choice for short local journeys, particularly those 5km or less”*³. This emphasises the importance of promoting sustainable transport and hence the wording of the supporting text should be amended accordingly.
- 2.9 The supporting text⁴ also does not take into account the effects of the COVID-19 pandemic and the subsequent increase in people working from home, as well as grocery delivery demand and an increase in update of active modes of travel, meaning a likely significant decrease of journeys made on an average working week.

¹ Paragraph 4.13

² Paragraph 5.16

³ Paragraph 33

⁴ Paragraph 33

2.10 To make the plan sound, the wording of policy HP2 should be amended as per the above suggestions and with the policy amended as follows:

“New small-scale housing development outside the Urban Area boundary, as shown on the Policies map, will be permitted where:

- 1) The site is within or adjacent to existing areas of housing; or*
- 2) The site is well related to the settlement boundary; and*
- 3) The site is within reasonable walking distance to a good bus service route or a train station as well as safe walking and cycling routes that connect to a local, district or town centre; and*
- 4) It comprises development that does not adversely affect the predominant development form of the area, taking particular account of:*

- a. building line and scale of adjacent dwellings;*
- b. plot size and proportion,*
- c. site coverage/ratio,*
- d. space between dwellings,*
- e. landscape and views through to countryside beyond; and*

5) It comprises development:

- a. Of not more than ~~4-units~~ 1 hectare; and*
- ~~b. Where the design and external appearance of each dwelling is demonstrably different, unless a terrace or semi-detached form is appropriate; and~~*
- c. That does not extend the settlement frontage.”*

3.0 SUMMARY

- 3.1 This Statement demonstrates that in response to question 3 of the Inspector's MIQ's, there is no justification for defining 'small scale' as "*no more than 4 units*". This is particularly given the significant levels of unmet need across the South Hampshire region, the need to increase the buffer due to reliance on strategic sites (as explained in the Matter 3 Statement) and the constraints to the short-term supply of housing.
- 3.2 To make the plan sound, the wording of policy HP2 should be amended so that the development limit is a more appropriate limit of "*not more than 1 hectare*", aligning and ensuring consistency with national and local policy. We also suggest removing the requirement for each dwelling to be "*demonstrably different*" from the policy.
- 3.3 The supporting text to the policy should also be amended to properly take into account cycling as a valid means of determining accessibility and sustainability, as well as the lifestyle changes as a result of the COVID-19 pandemic.

APPENDICIES (Attached Separately)

Appendix A – site location plan