

**Fareham Local Plan 2037
Revised**

**Examination Statement
Matter 6
Site BL1**

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Prepared on behalf of Raymond Brown Rookery Properties

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1.0 Introduction

- 1.1 This Statement has been prepared by Southern Planning Practice Ltd on behalf of Raymond Brown Rookery Properties who own land at Rookery Farm, Botley Road, Swanwick which was allocated 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 It is pertinent to note that representations have been made on behalf of our client, Raymond Brown Rookery Properties throughout the preparation of the emerging Local Plan. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan, this statement draws on previous responses where necessary.
- 1.3 This Statement is prepared in response to the Inspectors' Matters, Issues and Questions – Matter 6 – Housing Allocations and in particular in respect of the following proposed allocations:
- FTC 3 Land East of Fareham Station
 - FTC4 Land West of Fareham Station
 - HA42 Land South of Cams Alders
 - HA55 Land South of Longfield Avenue
 - HA56 Land West Of Downend Road
 - BL1 Town Centre
- 1.4 This should not be taken to be the only sites to which objection is raised on grounds of soundness but we do not wish to repeat the representations we have earlier submitted in December 2020 and July 2021, which remain before the Inspector. We have therefore focused these further statements on a small number of key sites which we consider are unsound and should not be allocated. The assessments which are submitted individually are accompanied and supported by a number of Appendices.

2.0 **Response to Inspector's Questions**

Question 53 – On what basis has the indicative yield of 620 homes been calculated?

- 2.1 The indicative yield of 620 homes proposed to be allocated in the Town Centre by Policy BL1 does not appear to have been calculated in an informed, realistic way. There has been no evidence submitted with the Local Plan to suggest how such a figure has been arrived at. Instead it would appear a very broad, vague figure has been stated to fit with the required housing provision. Such comments were raised in response to the draft Local Plan and the council did not provide clarity in their responses to our comments.
- 2.2 Therefore, due to the lack of any evidence to confirm how the figure of 620 dwellings has been arrived at, as currently drafted the Local Plan is unsound.

Question 54 - Is the Policy justified? What consideration has been given to delivery and viability at this stage?

- 2.3 We are supportive of the Local Plan being ambitious when planning for growth, however, Policy BL1 is not considered to be justified for several reasons.
- 2.4 Whilst Paragraph 68 of the NPPF sets out that planning policies can allocate broad locations for growth for 6-10 years and, where possible, years 11-15 of the plan, we do not believe that the deliverability of the allocation proposed by Policy BL1 has been assessed. Whilst the NPPF supports Local Plans to plan for longer term growth, the Planning Practice Guidance (PPG) sets out that it is recognised that there may not be certainty at the time the plan is produced. Paragraph: 059 Reference ID: 61-059-20190315 of the PPF confirms that *“In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged.”* There is no evidence to suggest that there is a reasonable prospect of the 620 homes allocated by Policy BL1 coming forward in the later years of the plan period, if at all.
- 2.5 It is pertinent to note that the site proposed to be allocated by Policy BL1 is likely to be in multiple landownerships which is likely to create delays in sites within the allocated area coming forward. It is acknowledged that the council intend to prepare a Supplementary

Planning Document to guide the comprehensive mixed-use redevelopment of the site, however there is no indication of timescales for the preparation of this document which could help to provide some certainty over when the site is likely to come forward.

- 2.6 In addition, it is noted that brownfield town centre sites are notoriously slow to come forward due to many complexities regarding both land ownership and various other technical issues. One example locally of where a brownfield, town centre redevelopment has taken some years to come forward is in Winchester District. Around 20 years ago, Winchester City Council allocated a city centre site known as Silver Hill for redevelopment. However, due to several complexities including land ownership, technical issues and uses still being required on the site, this allocation has not yet come to fruition. A Supplementary Planning Document for the Central Winchester Regeneration Area was produced in 2018, some 15 years after the allocation of the site. It is considered that this site is very similar to the site allocated by Policy BL1 and therefore the council should be realistic with its ambitions.
- 2.7 In light of the above, it is considered that there is such uncertainty over deliverability and viability of the site given that there is no evidence of the suitability, availability and achievability of the site within the Local Plan or its evidence base. It is therefore unlikely that the site will be able to deliver the required number of homes in years 10 to 16 of the plan period. As such, Policy BL1 is considered to be unrealistic both in terms of the number of homes it proposes to allocate and the timeframe in which it suggests it will come forward. Therefore Policy BL1 is not positively prepared, justified or effective and is therefore unsound.

Question 55 – In order to be effective, should Policy BL1 refer to conserving and enhancing heritage assets in the Town Centre?

- 2.8 Notwithstanding the above, in order to be effective Policy BL1 should have a criterion which requires new development to respect the historic context and make a positive contribution towards protecting and enhancing the local character and heritage assets within the area as well as any important historic views of the Town Centre. Such a criterion is essential to ensure the policy is consistent with national planning policy.

3.0 Conclusion

3.1 This is a site where the issue does not simply relate to whether the site can properly accommodate the number of units being proposed, but the suitability, availability and achievability must be questioned. It therefore remains our conclusion that the allocation is UNSOUND and should be deleted.