

Planning Strategy
Fareham Borough Council
Civic Offices
Civic Way
Fareham

(Representations submitted by email to planningpolicy@fareham.gov.uk)

27th March 2015

Re: Fareham Local Plan Part 2: Development Sites and Policies Plan Main Modifications

Introduction

This letter is in response to the above consultation and provides Gladman Developments' representations on the Main Modifications to Fareham District Council's Development Sites and Policies Plan. Gladman understand that the preparation of these changes follows the completion of the Development Sites and Policies Plan Examination hearings in November 2014 and are now being proposed in response to the Examination Inspector's Preliminary Findings letter.

Gladman request to be kept informed of further updates on the Development Sites and Policies Plan's preparation and to be notified of the document's adoption by the Council.

MM1 – Local Plan Review

Gladman welcome the inclusion of additional text within the Development Sites and Policies Plan that re-emphasises the Council's commitment to undertake a review of its Local Plan. This is particularly significant in light of the existing housing requirements for the district set out in Policy CS2 of the adopted Fareham Core Strategy and the National Planning Policy Framework (The Framework) requirement to ensure Local Plans are based on meeting the full objectively assessed needs for the housing market area (paragraph 47) and up-to-date and relevant evidence (paragraph 158).

It is the case that the Council's existing housing target for providing 3,729 new dwellings in Fareham over the period 2006-2026 is derived from the now revoked and dated South East Plan. Whilst this figure has now been increased by 472 dwellings in light of the 2012 South Hampshire Strategy review and carried forward into the Development Sites and Policies Plan, this requirement has not been based on the findings of a Framework-compliant assessment of the authority's full objectively assessed housing needs and falls significantly short of providing the 395 dpa that the January 2014 PUSH SHMA suggests are now needed in the district.

In light of the Framework's requirements and more recent evidence of Fareham's full objectively assessed housing needs, Gladman submit that there is now a clear need for the Council to revisit the existing housing requirements for the district set out in the Council's 2008 Core Strategy. To provide a sufficient supply of deliverable and developable land in the authority area there is a need to bring forward further housing sites, over and above the level currently planned for in the district, to ensure the authority's housing needs are met in full.

Gladman note that consideration has been given to the implications of the decision in Gladman v Wokingham Borough Council¹ for the Development Sites and Policies Plan's preparation. In this regard Gladman would emphasise that whilst it is only necessary for the Inspector to consider the extent to which the Development Sites and Policies Plan conforms to the housing requirements set out in the Council's Core Strategy, this does not represent an endorsement of its targets or those put forward in the 2012 South Hampshire Strategy for the purpose of representing the Council's objectively assessed housing needs.

MM21 – Five-Year Housing Land Supply

Gladman welcome the addition of further text to Policy DSP40 that provides greater flexibility when considering housing applications outside of the authority's existing urban settlement boundaries. Where a five-year supply of housing land cannot be demonstrated and policies for the supply of housing are out-of-date, applications should be properly considered against the Presumption in Favour of Sustainable Development. Gladman refer the Council to a recent appeal decision in respect of Land adjacent to 'the Navigator', Lower Swanwick², in this regard.

Gladman would be opposed to the use of restrictive policies such as urban settlement boundaries and strategic gaps if these would only act to prevent otherwise sustainable development from going ahead. As set out in paragraphs 21 and 23 of a recent a High Court decision in respect of North Devon District Council³, policies that place a blanket restriction on development would be fundamentally contrary to the Framework in that they fail to allow the proper planning balance it advocates to be carried out.

I hope you have found these representations constructive, if you require any further information or wish to meet with one of the Gladman team then please do not hesitate to contact me.

Yours faithfully

Peter Dutton
Strategic Land Team
Gladman Developments

¹ Gladman Developments Limited v Wokingham Borough Council [2014] EWHC 2320 (Admin)

² Appeal Reference APP/A1720/A/14/2220031

³ Colman v. (1) SoS for Communities and Local Government and (2) North Devon District Council and (3) RWE Npower Renewables Limited [2013] EWHC 1138 (Admin)