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30<sup>th</sup> March, 2015

Dear Mr. Jolley,

**FAREHAM LOCAL PLAN - SHAPING FAREHAM'S FUTURE**  
**LOCAL PLAN PART 2**  
**DEVELOPMENT SITES AND POLICIES – MAIN MODIFICATIONS**  
**MARCH 2015**

We write on behalf of our client, Hallam Land Management Ltd. (HLM) in response to the above public consultation on the Council's Development Sites and Policies Plan (DSP). Within this submission we consider the Main Modifications to policies DMM1, DMM21, DMM27, and DMM34.

**DMM1**

Main Modification DMM1 confirms that at the text at page 8, paragraph 1.11 will be amended to confirm the Council's commitment to a review of the Local Plan, which will be informed by the current review of the South Hampshire Strategy. The current timetable anticipates the following:

- Summer 2016 – Consultation on draft Local Plan (Regulation 18)
- Summer 2017 – Publication of pre-submission Local Plan (Regulation 19)
- Autumn 2017 – Submission to Secretary of State (Regulation 22)
- Winter 2017 – Examination (Regulation 24)
- Spring/Summer 2018 – Adoption (Regulation 26)

HLM submit that the proposed timetable for review is overly cautious and suggest that a review could be facilitated much earlier than that currently set out in the DSP – we question why the initial consultation on the draft Plan is not due to take place for over a year and would suggest that, factoring in the high likelihood for slippage, adoption in 2018 is ambitious: it is crucial that the Council brings the programme forward if there is to be any realistic prospect of this target being achieved. HLM conclude that it is highly undesirable for the Council to wait until September 2018 for the adoption of their plan, given that the current Core Strategy is not up to date, and therefore not in accordance with Para. 12 of the NPPF requiring local planning authorities to have an up to date plan in place.



We note that the additional text states *that "The Local Plan Review undertaken by the Council will be comprehensive in nature, updating and reviewing the adopted Core Strategy, Development Sites and Policies and Welborne Plans, to form one Local Plan"*. This assertion is welcomed however it is not considered to carry sufficient emphasis and we would therefore suggest that the text needs strengthening to the effect that it provides clear details and a framework for how it plans to deliver Fareham's forecast housing needs across the Plan period, whilst ensuring that the Plan is subject to ongoing review and monitoring to ensure that the spatial location of new housing is planned for appropriately and at the correct time.

### **DMM21**

HLM acknowledge that the modifications put forward under DMM21 provide some flexibility and potential for additional sites to come forward, over and above the allocations in the Plan, where it can be proven that the Council cannot demonstrate a five year land supply against the Core Strategy housing targets. HLM welcome the proposed revisions to DMM21 on the basis that it is representative of pragmatic approach towards delivering housing growth and indicates a willingness to adapt to changing circumstances.

We note the new text at the end of Policy DSP40 that states *"Where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements of the Core Strategy (excluding Welborne) additional housing sites, outside the urban area boundary, may be permitted where they meet all of the following criteria:*

- *The proposal is relative in scale to the demonstrated 5 year housing land supply shortfall;*
- *The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;*
- *The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;*
- *It can be demonstrated that the proposal is deliverable in the short term; and*
- *The proposal would not have any unacceptable environmental, amenity or traffic implications."*

HLM wholly support the additions to DSP40 in particular the recognition that in the absence of a five year housing land supply, the release of sites outside the urban boundary may well be necessary – including, potentially, sites within Strategic Gaps, subject to sensitive design.

### **DMM27**

HLM consider that the proposed modifications set out within DMM27, in relation to the Stubbington Bypass, are broadly positive. Notwithstanding this, HLM note that the preferred route which connects the B3334 Gosport Road, south of Stubbington to the B334 Titchfield Road, north of Stubbington, does not align to the that proposed in HLM's current application (P/14/0222/OA) for up to 1,550 residential dwellings.

The alignment of the road as set out in planning application reference P/14/0222/OA has been carefully designed to ensure that the route does not undermine the purpose of the Strategic Gap and does not result in any significant adverse effect on the physical or visual separation of Stubbington/Lee on the Solent and Fareham/Gosport.

### **DMM34**

In relation to Policy DMM34, HLM are pleased that the Brent Geese and Waders sites have been downgraded from "important" to "uncertain".

**Conclusions**

We would be grateful for confirmation that these representations have been received, that they have been registered as duly made.

We trust this submission is clear and helpful but should there be any queries in relation to any element of the above and attached, please do not hesitate to contact the writer.

Yours sincerely,



**GEMMA CARE**  
Associate

- cc. R. McKeown - Hallam Land Management
- C. Penny - Hallam Land Management