

## **Summary of examples of Broad Location for Growth in other recent Local Plans**

### **1. Introduction**

- 1.1 As discussed at the hearing sessions for Matter 6.8 on Tuesday 29<sup>th</sup> March on Broad Location for Growth in Fareham Town Centre (BL1), it was felt helpful for the Inspector and interested parties for the Council to provide examples of two Adopted Local Plans which include Broad Locations for Growth to meet their Local Plan housing needs and the Independent Inspector's reports which found those plans sound. This is a summary note providing the relevant and key pieces of information on two Local Planning Authorities (Harrogate and Maidstone Borough Councils) Local Plan Policies on Broad Locations for Growth are referred to as well as relevant paragraphs of the examining Inspector's reports on those policies in which it was concluded they were sound.
- 1.2 The Council considers this information to be useful to the Inspector examining the Fareham Local Plan 2037 in that it helps to further support and justify Fareham Borough Council's approach to the Broad Location for Growth within Fareham Town Centre.

### **2. Harrogate Local Plan 2014-2035 - adopted 2020**

- 2.1 Policy DM4 (Green Hammerton/Cattal Broad Location for Growth) is identified in [Harrogate's Adopted Local Plan](#) for housing growth in the plan period (and beyond). The growth area has been included in the supply for the last 10 years of the plan period (2024 -2035). The policy proposes a new settlement of at least 3000 homes, (with 1,000 homes in plan period). The contribution to the Local Plan supply is noted in paragraph 10.17 (page 416) and [Appendix 2 the Housing Trajectory](#), which confirms that it is expected that at least 1,000 dwellings will be delivered by 2034/35 within the plan period.
- 2.2 The policy refers to the production of a New Settlement Development Plan Document whereby the boundary, nature and form of a new settlement within this broad location will be established.
- 2.3 Further useful information on the content of the DPD is contained within paragraph 10.14 (page 415) of the Plan and paragraph 10.11 states that 'a substantial part of the land within the broad location is being actively promoted for development'. It is understood that production of the DPD is underway following adoption of the Local Plan.

### **3. Examining Inspector's Report-**

[Appendix 1 - Report of the Planning Inspectorate - 30 January 2020.pdf](#)  
([harrogate.gov.uk](http://harrogate.gov.uk))

*24. The Council has made a balanced planning judgement (informed by both the SA and a, careful and considered, comparative assessment of potential new settlement locations) that a new settlement is an appropriate response to accommodating the borough's longer-term housing needs. The conclusion in relation to the most suitable (broad) location for that new settlement necessarily involves matters of planning judgement, including consideration of 'fit' with the overall Growth Strategy. The process is not just a box ticking exercise. I consider it to be sound.*

*26..... Nonetheless, I conclude that there is a reasonable prospect that a new settlement in this broad location could make a significant contribution towards the delivery of homes by the end of the plan period and in the longer term. Should the case prove otherwise, the matter can be addressed during a plan review (notably as delivery from the new settlement is not needed to support the Council's five-year housing land supply)."*

*27. Policy DM4 will provide an appropriate framework for the production of a New Settlement Development Plan Document (NSDPD), which itself will provide more detailed policy guidance in relation to the precise location, design and delivery of the new settlement. It will also need to address very carefully the implications of the new settlement for nearby villages, having regard to the degree to which the new settlement is just that, rather than being merely an extension of an extant settlement.*

*28. I do not consider that there is sufficient evidence at this stage for the plan formally to allocate specific pieces of land effectively. Indeed, such an approach could fetter the NSDPD's ability to ensure high-quality, comprehensive development, having regard to the key issues (as set out in DM4) that it will need to address."*

### **4 Commentary**

- 4.1 Whilst it is appreciated that this example from Harrogate is different to Fareham's Policy BL1 in that it is for a new greenfield settlement as opposed to a town centre location redevelopment, there are clear similarities in approaches between Policy BL1 (Fareham) and Policy DM4 (Harrogate). They are both being included within the Councils' housing supply in the latter parts of the plan period and both have substantial parts of the land being actively promoted for development. BL1 has the additional benefit of being under majority ownership (over 70%) of Fareham Borough Council.
- 4.2 As shown, the examining Inspector found Harrogate Council's approach to allocating the broad location for growth to accommodate the borough's longer-term housing needs to be sound, in particular its fit with the development strategy. As set out in the hearings on this matter, Fareham Borough Council considers its approach to BL1 sound in also accommodating the borough's longer-term housing needs particularly in light of the assessment carried out

in terms of the SA as well as with the preferred residential development strategy.

- 4.3 Importantly the examining Inspector concluded that there is a reasonable prospect that this broad location could make a significant contribution towards the delivery of homes by the end of the plan period. It is worth noting the Inspector acknowledged that delivery from this Broad Location for Growth is not needed to support the Council's five-year housing land supply and that if delivery of the Broad Location does become less than a reasonable prospect then this could be addressed during a Plan Review.
- 4.4 Fareham Borough Council maintains that, in line with the conclusions on the soundness of policy DM4 of the Harrogate Local Plan, there is a reasonable prospect of policy BL1 making a significant contribution towards the delivery of homes by the end of the plan period and therefore is a sound approach.

## **5. Maidstone Local Plan – Adopted 2017**

- 5.1 [Maidstone's adopted Local Plan](#) contains three Broad Locations, one of which is policy H2 (1) Maidstone's the town centre. The policy makes provision for approximately 940 dwellings. The policy sets out that different parcels of the Town Centre which contribute to the 940 dwelling figure. This is further explained within paragraph 4.191 supporting text of the Plan as is set out below.
- 5.2 *'It is acknowledged that there is an oversupply of poorer quality office stock in the town centre which is no longer fit for purpose. This has the effect of suppressing the town centre office market and thereby inhibiting new development which could better meet modern business needs. A route to tackle this is to rationalise the supply of the poorest stock through conversion or redevelopment to alternative uses..... With a corresponding uplift in the market for town centre apartments, this trend could see the delivery of significant new housing in and around the town centre... At 1 April 2016, a total of 665 dwellings had been consented through prior notification within the town centre during the first three years of its operation - with 85% achieved through the conversion of poor quality office stock. There is substantial further poor quality office floorspace in the town centre from which to realise further residential opportunities, yielding approximately 350 dwellings during the plan period. The Town Centre Study and recent interest from landowners also signal further potential opportunities within the town centre including at The Mall (400 dwellings) and the riverside west of the River Medway (190 dwellings). The town centre broad location has the potential to deliver in the order of 940 additional homes'.*
- 5.3 Policy H2 (1) also states that the delivery will be achieved through 'a masterplanning approach, working with partners to guide development and

*to maximise opportunities for regeneration.*' The 940 dwellings was included in the overall housing supply as indicated by Policy H2 in the Plan however there is no detail as to when the site will be delivered over the plan period, and interestingly Policy LPR1 (page 314), which relates to the triggers for a Local Plan review, excludes the Town Centre Broad Location from the list of triggers, although includes the other two Broad Locations.

- 5.4 The Broad Location of Growth in Maidstone Town Centre is being carried forward into the emerging Local Plan in policy LPRSP1. Within the Maidstone Local Plan Review ([Regulation 19 Submission Version October 2021](#)) paragraph 5.11 of the supporting text confirms that the Council's Strategic Planning and Infrastructure Committee in November 2019 adopted a suite of planning guidance documents setting out the Council's aspirations for the regeneration of five town centre opportunity sites (Gala Bingo and Granada House, Len House, Mote Road, Maidstone West (Broadway Shopping Centre) and Maidstone Riverside). That same paragraph states that these 'added design guidance and capacity certainty to a number of sites which were identified within the Policy H2(1) -Town Centre Broad Location' of the 2017 adopted Plan'. Paragraph 2.3 of the [Committee report](#) sets out that these documents are locally adopted guidance documents, i.e. not DPDs or SPDs.
- 5.5 Of note is that in the emerging Local Plan, Policy LPRSP1 identifies the Broad Location for Growth within the Town Centre this time for up to 1,219 dwellings (including the five sites referenced in paragraph 5.4 of this document). Policy LPRSP1 forms part of a longer-term vision to improve the Town Centre of Maidstone and is stated to be brought forward in a Town Centre Strategy to 2050. Whilst this particular Plan and Policy is yet to be examined and found sound the principle of establishing broad locations to meet housing growth in a town centre location and including that housing supply within the plan period is well established and accepted.

## **6. Inspectors Report on the Maidstone Local Plan – Adopted 2017**

[Microsoft Word - 20170727 Maidstone Borough Local Plan Report V4 after fact check.docx](#)

*186. In further evidence to the examination the Borough Council has agreed that the policy should be modified so that delivery is concentrated firstly on 2 locations where change is anticipated in the plan period – The Mall and the Riverside Quarter. Both were previously identified in the Town Centre Study [Document CEN 002]. For consistency with paragraph 157 of the NPPF the Broad Location should be indicated on the key diagram as proposed by MM2. The other main source of supply of town centre housing would be through office to residential conversions. These would typically come forward through the prior notification process as permitted development. The scope for such development has previously been identified in Document ECON 002 and has already been demonstrated by a stream of prior notification applications.....*

187. I conclude that for the H2(1) Town Centre Broad Location to be shown to be developable and consistent with national policy it should be modified in accordance with MM30 to:

- Increase the amount of housing to 940 dwellings from the 700 proposed in the submitted Local Plan; and
- Focus on the 2 areas of The Mall and the Riverside Quarter within which redevelopment is expected to deliver additional housing together with an allowance for office to residential conversions elsewhere in the town centre; and
- 50 units should be added to the Borough wide windfall allowance in respect of other development on unidentified sites in the town centre that was previously part of the Broad Location allowance.

## **7. Commentary**

7.1 The Maidstone Town Centre Broad Location for Growth shares similarities with Policy BL1 in the Fareham Local Plan 2037 in that it is a town centre location and included within the Local Plan's overall housing. The approach in the Maidstone Local Plan 2017 was found sound by the examining inspector subject to the proposed modification to increase the amount of housing . Since then, the Council has been able to produce further guidance on the design and capacity for the broad location and carried the policy through to their Submission version of the Local Plan Review forming part of the of new policy LPRSP1 Maidstone Town Centre. The approach undertaken by Maidstone Borough Council is not dissimilar to the approach being anticipated for Policy BL1 in the Fareham Local Plan 2037. The Council is committed to bringing the site forward for development and is to produce and consult on a Supplementary Planning Document for the area covered by BL1 later this year. The outcome of this can inform the review of the Local Plan.

## **8. Conclusions**

- 8.1 As shown by the two examples, Policy BL1 is not an unusual approach to securing the delivery of homes in a sustainable town centre location by the end of the plan period. In both cases, the Broad Locations in question were included in the overall housing supply for the Local Plan, just as the Fareham Local Plan is proposing to do. Whilst the Harrogate example showed the Council moving straight to producing a DPD, the Maidstone case showed the value of intervening policy documents, in that case, local policy documents, before developing greater detail and allocating specific sites within the area in the emerging Local Plan.
- 8.2 The Council maintains on the basis of the similarities with the examples above and with the information put before the Inspector at the examination hearings,

that there is a reasonable prospect of BL1 being available and developed at the point envisaged, making a significant contribution towards the delivery of homes by the end of the Fareham Local plan 2037 plan period. It also maintains that the approach to develop an SPD through a masterplanning approach which could lead to specific allocations in a future DPD through the review of the Local Plan is sound.