

Date 24 October 2014

Claire Jones-Hughes
Programme Officer
c/o Banks Solutions
6 Brading Road
Brighton
BN2 3PD

Dear Ms Jones-Hughes

**INDEPENDENT EXAMINATION OF THE FAREHAM LOCAL PLAN PART 2: DEVELOPMENT SITES AND POLICIES PLAN
ISSUE 2: THE EXISTING SETTLEMENTS (DSP2 – DSP6)
WYG FOR VILLAGE GREEN PLC
RESPONDENT REF: DREP403**

I refer to the above matter and confirm that my client Village Green plc wishes to be included in the list of participants for the Hearing Session for Issue 2 of the Independent Examination of the Local Plan Part 2: Development Sites and Policies Plan to take place on 11th November 2014.

I will be representing my client at the Hearing Session and wish to reserve my place at the Hearing.

I set out below our response to the relevant Inspector's questions set out in the 'Issues and Questions' document dated September 2014.

I confirm that our previous written submissions relating to the Publication Version of the Local Plan Part 2 (dated February 2014) remain valid and request that the comments below are read in conjunction with our previous statements.

Question 2.1

The Council's stance as set out at Paragraph 3.9 of the Local Plan Part 2 that it does not need to review the settlement boundaries based on evidence studies is now flawed in light of the publication of the PUSH Strategic Housing Market Assessment, January 2014, that shows the "full, objectively assessed needs for market and affordable housing" in accordance with the NPPF (Paragraph 47). The housing need for Fareham Borough at 395 dwellings per annum is more than double the Core Strategy requirement of 186 dwellings per annum.

As set out in our response to Issue 1, the Core Strategy is out-of-date and there is a clear rationale for allocating housing development sites based on either the Fareham Borough housing need as set out in the PUSH Strategic Housing Market Assessment, January 2014 prepared by GL Hearn, or as an alternative the under-delivery of housing at Welborne. Failure to allocate sites on either of these bases would be contrary to the objectives of the NPPF to boost significantly the supply of housing (Paragraph 47).

The NPPF is clear that local planning authorities need to meet "full, objectively assessed needs for market and affordable housing" and therefore Fareham Borough Council now need to review the Defined Urban Settlement Boundaries to take account of this additional housing need from sustainable sites.

My client's site at Land adjacent to the Navigator Public House, Lower Swanwick is considered a highly sustainable site adjacent to the settlement boundary and forming an integral part of the settlement.

Even without the housing growth, we would also argue that my client's site should already be included within the settlement boundary of Lower Swanwick, as it located adjacent to the Navigator public house and boatyards that are also not included within the settlement boundary. My client's site, with the boatyards and the pub are located within the urban envelope of the settlement, and therefore their omission from the settlement boundary is illogical.

My client's site is highly sustainable, with quick and easy access to Bursledon Station (7 minute walk), a bus stop adjacent to the site at Bridge Road, and several local employment sites within a short walking distance. Schools, health facilities and local shops are all within a 1.5km radius of the site.

We therefore recommend that my client's site is allocated for housing and the settlement boundary is redrawn to include my client's site at Land Adjacent to the Navigator, as set out below at Appendix 1.

Conclusions

The Local Plan Part 2 is deemed to be unsound in relation to the following:

- Paragraphs 3.1-3.9
- Proposals Map

The Plan fails the key tests of soundness as follows:

- **Positively prepared** – No because it does not seek to meet "objectively assessed needs for market and affordable housing", and therefore sites outside of the existing settlement boundaries have not been duly assessed.
- **Justified** – No because, the Council has ignored the latest and only objectively assessed needs assessment of the Borough. In addition, there is an absence of strategy to deal with the under-delivery at Welborne.
- **Effective** – No because the ring-fencing of Welborne is leading to an under-delivery of housing for Fareham and the sub-region, especially as sites outside of the settlement boundaries are not assessed.
- **Consistent with National Policy** – No, because it seeks to allocate sites based on the housing numbers as set out in South Hampshire Strategy 2012, and this does not reflect "objectively assessed needs" (Paragraph 47 of the NPPF). The Core Strategy housing figures pre-date the NPPF and are out-of-date as the Local Plan Review will not be in place until 2018, 7 years after the adoption of the Core Strategy, and not in accordance with the NPPG. The shortfall in housing is also not boosting significantly the supply of housing in the Borough and therefore also contrary to the NPPF (Paragraph 47).

The Plan can be made sound, where the Council adopts the SHMA 2014 housing figures for Fareham at 395 dwellings per annum for the period 2011-2026 which totals 5,925 dwellings, or alternatively the under-provision at Welborne over the development plan period from 2006-2026 of 2,490 dwellings. One of these positions should be used to allocate housing sites.

The Plan needs complete change, including the parts as itemised above, plus the allocation of my client's site within Chapter 7 of the DPD and associate Tables. The settlement boundary also needs to be redrawn

on the Proposals Map to include the site and wider urban area, including the boatyards, Navigator public house and the Premier Marinas development, as shown at Appendix 1.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CH', with a large, stylized flourish extending downwards and to the right.

Christopher Hemmings
Associate Director
For and on behalf of WYG

APPENDIX 1: AMENDMENT TO THE SETTLEMENT BOUNDARY AT LOWER SWANWICK

INSET 1

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Licence 100019110. 2014 Scale 1:10,000

