



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 COASTAL WATERWATCH LTD
RESPONDENT REF: DREP411**

I refer to the above matter and confirm that my client Coastal Waterwatch Ltd 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.

I set out below our response to the relevant Inspector's 'Issues and Questions' document, 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As set out in our response to Issue 1, the Core Strategy is out-of-date and there is a clear rationale for allocating housing development sites based on either the Fareham Borough housing need as set out in the PUSH Strategic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 69 Botley Road is considered a highly sustainable site, which is partially within the settlement boundary, and partially outside of the settlement boundary at Park Gate. The site forms an integral part of the urban area, with urban form fronting Botley Road, including the existing dwelling house at 69 Botley Road, the new four storey care home adjacent to the site to the north, and the Village Inn public house to the south.

The site could form part of the wider allocation as land to the south, at land rear of the Village Inn (within the ownership of Mitchells & Butlers Retail Ltd) is available for development and possibly to the north, at land to the rear of the care home (within the ownership of Quantum Homes) which is also available. This land to the rear is currently outside of the Defined Urban Settlement Boundary and classified as 'countryside' by the Council on the Proposals Map. This land does not perform the role of open countryside, as it is not in agricultural use; it is enclosed by a significant belt of trees; and is not publically accessible nor can be viewed from public vantage points.

Given the existing urban character of Botley Road, which has been reinforced by the massing and bulk of the new four storey care home, the land outside of the settlement boundary is more defined by the character of the adjacent urban built form. Indeed, it should be noted that the care home development breaches the settlement boundary by approximately 10 metres, and therefore the Council has already accepted the principle of development in the countryside in this location, and further, that no harm to countryside arises from this breach.

Even without the increase in housing needs, we would argue that my client's site should already be included within the settlement boundary of Park Gate, given the nature of adjacent uses, the enclosed nature of the site and its minimal impact on the settlement. Moreover, the site's location is highly sustainable with very close proximity to Swanwick Station; shops and facilities at Park Gate within walking distance; Park Gate Primary school within 1 km; and health provision at Fareham Community Hospital within 1 km.

Indeed, the Council's Sustainability Appraisal shows clearly that the 69 Botley Road site is sustainable, as the scoring criteria shows 7 positive scores, 3 neutral scores and 1 negative score. Only three of the draft housing allocations perform better than 69 Botley Road under the criteria.

We therefore recommend that the settlement boundary is redrawn to include my client's site at 69 Botley Road, 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 two bases 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 wider site at 69 Botley Road as shown at Appendix 1.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Hemmings', written over a light blue horizontal line.

Christopher Hemmings
Associate Director
For and on behalf of WYG



APPENDIX 1: AMENDMENT TO THE SETTLEMENT BOUNDARY AT PARK GATE

INSET 2

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

