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# Fareham Local Plan Part 2: Development Sites and Policies

Hearing Statement  
On behalf of Hallam Land Management Ltd

Issue 2:  
The Existing Settlements (DSP2 - DSP6)

October 2014



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| <b>Project Ref:</b> | 21743/P5/A5                   | 21743/P5a/A5                  |
| <b>Status:</b>      | Draft                         | Final                         |
| <b>Issue/Rev:</b>   | P5                            | P5a                           |
| <b>Date:</b>        | 23 <sup>rd</sup> October 2014 | 24 <sup>th</sup> October 2014 |
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Ref: 21743/P5a/A5/GC/dw

Date: 24th October 2014

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## **ISSUE 2: THE EXISTING SETTLEMENTS (DSP2 - DSP6)**

This statement is submitted to the Examination into the Fareham Local Plan Part 2: Development Sites and Policies (LP2) (June 2014) ('the Examination') on behalf of Hallam Land Management Ltd (HLM). This statement refers to the following Issue:

### **Issue 2: The Existing Settlements (DSP2 - DSP6)**

**2.1 Why have the defined urban settlement boundaries not been subject to review, for example as anticipated for Fareham in paragraph 5.27 of the Core Strategy? Does the Council's approach reflect the most appropriate strategy in the circumstances? Is the lack of a settlement boundary for BurrIDGE justified?**

*Why have the defined urban settlement boundaries not been subject to review, for example as anticipated for Fareham in paragraph 5.27 of the Core Strategy?*

Paragraph 5.27 of the Core Strategy (CS) states quite clearly that:

**'The Site Allocations and Development Management DPD will include details of proposed land use designations and review settlement boundaries in Fareham...The site allocations for development will include housing, employment, retail, leisure, sport, community facilities and open space and will be in line with the principles established in the Core Strategy for Fareham...'**

Furthermore, Policy CS6 of the CS - The Development Strategy - is clear that a review will be undertaken:

**"...through the Site Allocations and Development Management DPD, taking into consideration biodiversity/potential community value, the character, accessibility, infrastructure and services of the settlement and impacts on the historic and natural environment."**

No such review has been undertaken. In addition to contradicting the contents of the adopted CS, we suggest that the Council's approach to settlement boundaries within LP3 directly conflicts with paragraph 14 of the NPPF which requires Local Plans to exhibit sufficient flexibility to respond to rapid change.

HLM recognise the role of settlement boundaries in providing geographic boundaries for the Borough's respective communities, however in light of an identified housing requirement issue (our statements for Issues 1 and 7 refer) we consider that there are an insufficient number of identified housing sites to meet the Borough's full needs (and that arising from any unmet need from Southampton and Portsmouth) and welcome the Inspector's very pertinent question as to why the Council has not undertaken a review of the defined settlement boundaries as part of the LP2 process. To be clear, HLM are of the firm view that a comprehensive review of the adopted CS **is** required now, and that to progress the LP2 as it stands is fundamentally at odds with the principle of good planning given the availability of evidence (in the form of the SHMA and the Open House work undertaken by Barton Willmore (Issue 7 statement and previous representations refer) that supersedes the growth figures set out within it. Notwithstanding strict legal interpretation of what is and what is not incumbent upon the Council in terms of pursuing the production of LP2, the fact remains that it rests on an unsound and outdated evidence base resulting in a plan which, though filling a 'policy vacuum' ultimately will and should have only a very limited shelf life, begging the question as to whether or not the exercise is a prudent use of public resources, especially when there is evidence already available of the full objectively assessed needs.

Paragraph 3.9 of LP2 states that it has 'not been necessary' to review settlement boundaries as part of the Plan, despite the contents of the adopted CS, which states throughout that the DSP will be the mechanism for undertaking a review of such boundaries. The Council's view is that

**'Evidence studies, including the Strategic Housing Land Availability Assessment and the Employment Land Review, have concluded that there are sufficient identified sites within the existing DUSBS [Defined Urban Settlement Boundaries] to meet the Borough's development requirements. In light of this, it has not been necessary to review the DUSBs in the Development Sites and Policies Plan.'**

No mention is made of the fact that the SHMA of January 2014 reveals a higher housing number overall than that upon which the CS is based and that as a consequence it cannot be stated that 'sufficient' sites have been identified in LP2 to meet development requirements. This is considered to be a deliberate attempt by FBC to not plan for the full housing requirements, when evidence of the full need is known.

HLM submit that LP2 ought to be suspended in the same vein as the East Hampshire Joint Core Strategy (JCS)<sup>1</sup> (and Cherwell) and not progressed until a review of the CS has been completed that reflects an uplift in overall housing numbers. A review of the settlement boundaries should be undertaken as part of LP2 (or a combined Local Plan) in conformity with the original intentions of the CS, at the appropriate time, in order to identify and allocate additional land for housing. In the interests of avoiding duplication across statements, it is not considered necessary to rehearse our position in respect of housing requirements and supply in response to question 2.1, rather we would invite the Inspector to consider the points raised in the statement for Issue 7 and examine the issue of settlement boundary review in this context, suffice to say that the early review proposed at paragraphs 1.9 - 1.11 is the very least we would expect given the circumstances within which LP2 has been produced: notwithstanding the fact that even if (and there are no guarantees) the revised SHS is published in 2016, given the complexities and length of the planning process for the adoption of DPDs, a revised CS would not be in place until at least 2018 - 19. There is sufficient evidence now to justify meeting the full objectively assessed needs. The Plan can then be reviewed again when the revised SHS is published.

*Does the Council's approach reflect the most appropriate strategy in the circumstances?*

No, the Council's approach does not reflect the most appropriate strategy in the circumstances given that the CS contains an express commitment to undertake a review of settlement boundaries across the Borough within LP2 and has subsequently failed to do so. Our comments above, in respect of the first part of question 2.1, apply equally here.

*Is the lack of a settlement boundary for Burr ridge justified?*

HLM have no comment to make on this matter.

**2.2 Is the review of Strategic Gap Boundaries sufficiently robust? Have the appropriate criteria been used in the assessment? Were proposed road schemes taken into account?**

We note the contents of paragraph 1.12 of LP2 which states that the role of the document is to

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<sup>1</sup> East Hampshire District Council and the South Downs National Park Authority undertook to complete further work on their Joint Core Strategy (JCS) resulting in the suspension of the Examination on the basis that undertaking such work would be 'the quickest route to an adopted plan...Both the Council and the SNDP agree that this will minimise the risks of 'planning by appeal'

**'identify development sites and development management policies for the Borough...up to 2026... The purpose of the Development Sites and Policies Plan is threefold... (2) Review and designate areas in the Borough such as settlement boundaries and strategic gaps...'**

Paragraph 3.12 of LP2 explains that the Council commissioned consultants to review the Strategic and Local Gaps in September 2012 ('the 2012 review').<sup>2</sup> It must be noted that this time the Council were not pursuing the Stubbington Bypass and hence the impact of this proposed development will not have been accounted for in that study. The review

**'...focussed on a survey and analysis of the areas outside of defined urban settlement boundaries within the Borough and assessed whether or not the gaps were in accordance with the criteria used in the Core Strategy.'**

Therefore, no thorough review has actually been undertaken, or, at most, the parameters of any 'review' have been so tightly drawn that they are in no way reflective of the wholesale review which was anticipated when the CS was adopted. The CS sets out the policy justification for strategic gaps at paragraph 6.52, explaining that they help

**'...define and maintain the separate identity of individual settlements continuing pressure for high levels of development mean that maintaining gaps continues to be justified.'**

Paragraph 6.53 goes on to explain that:

**'Maintaining separation between Fareham and Titchfield Common/Segensworth and Fareham and Stubbington will prevent coalescence of the settlements in this densely settled part of South Hampshire. The countryside separating the settlements is narrow in places and under pressure for development. A review of the detailed boundaries will be undertaken as part of the Site Allocations and Development Management DPD to identify the land essential to perform this role and that which cannot be protected by other designations.'**

Paragraph 3.13 of LP2 confirms that Local Gaps have not been retained in the Plan; the Strategic Gaps, on the other hand, will continue unchanged to follow the edge of existing settlements with the exception of the area immediately to the west of the Meon Valley and south of Warsash Road.

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<sup>2</sup> Fareham Borough Gap Review (September 2012) David Hares Landscape Architecture



HLM is of the view that a comprehensive assessment of gaps within the Borough and their capacity to accommodate development in the Borough is already long overdue and needs to be undertaken at the earliest opportunity particularly given the availability of new evidence in respect of overall growth requirements for the Borough and a very significant material change in circumstance since the 2012 review in the form of the proposed Stubbington Bypass, which will dissect the existing Strategic Gap between Fareham and Stubbington and deliver an entirely new physical boundary between the two settlements. New road schemes cannot therefore be said to have been taken into account in terms of the impact upon extent of Strategic Gaps, and we suggest that the Council's approach and the evidence base in this respect is insubstantial, out of date and, as with the settlement boundary issue, entirely inappropriate. LP2 certainly makes reference to the proposed Stubbington Bypass on numerous occasions throughout the document, and thus it is difficult to reconcile this with the lack of any meaningful review of the Strategic Gap that it will sever and alter in perpetuity.

LP2 should be suspended and only progressed at such a time when the full extent of housing requirements are taken into account, which in turn will inform a robust and thorough review of settlement boundaries and Strategic Gap designations.

### **2.3 Is policy DSP2 sufficiently detailed? Is it sufficiently clear how a decision maker should interpret this policy?**

Policy DSP2 is concerned with design, stating quite simply that

**'All new development in the Borough should be consistent with the policies set out in Core Strategy Policy CS17: High Quality Design, and the Design Supplementary Planning Document.'**

Policy CS17 of the CS sets out a number of criteria for new development, while the emerging Design SPD is intended to promote and provide guidance to achieve high quality for new development in accordance with the Framework, and to supplement the design policies in the CS. It is intended to provide detailed design advice on a variety of aspects from internal space standards to shopfront and signage guidelines.

We are of the view that while Policy DSP2 is not a detailed policy, it is nonetheless clear that development proposals will be expected to be consistent with the prescriptions of CS17 and the emerging SPD, both of which provide a good degree of detail and guidance. It therefore provides sufficient confirmation as to how development proposals will be assessed in terms of their design credentials. We are of the view that

it is sufficiently clear how a decision maker should interpret the policy and do not wish to make any further comment in respect of question 2.3.

**2.4 Is the requirement for a legal agreement on Ransom Strips, as set out in policy DSP5, appropriate and justified, particularly having regard to national advice on planning obligations?**

HLM do not wish to make any comment on this matter.

**2.5 Is the Council's commitment to the conservation and enhancement of the historic environment of the borough based on appropriate evidence and clearly demonstrated in LP2? Has it identified the historic assets within the Borough, including those at risk? Should there be a reference to protecting the historic shipwreck of the Grace Dieu?**

1.23 HLM do not wish to make any comment on this matter.