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Draft Fareham Local Plan 2036
CPRE Hampshire Submission

Dear Planning Strategy Team,

Thank you for giving CPRE Hampshire the opportunity to comment on the Draft Fareham Local Plan 2036 (Regulation 18). We have chosen to send our comments as a letter, rather than completing the forms, but where relevant we have expressed whether we support or object to any specific policies. CPRE Hampshire is a non-political charity whose role is to protect our green spaces, improve the planning system, to enable the right houses for the right people in the right places.

General Points

We support Fareham Borough Council's endeavours to have an up-to-date Local Plan in place, particularly in view of potential changes to the National Planning Policy Framework and associated methodology for calculating required housing numbers. And more specifically because recent Appeal decisions have left Fareham vulnerable to unplanned development by appeal based on a perceived lack of a 5-year Housing Land Supply by the Inspectorate.

So, we understand the rush to prepare a new Local Plan, but it is a pity that this draft essentially forms a Preferred Option. An Issues and Options stage would have given the local community a better opportunity to evaluate alternative possibilities and make an informed choice about how they would like to see Fareham developed over the next 20 years or so. So, it is particularly important that alternative strategies proposed in response to this consultation are given very careful consideration and adopted where they are more appropriate than what is now proposed.



Furthermore, CPRE Hampshire notes that the Council commenced a ‘call for sites’ exercise in 2015, which formed the basis of the SHLAA. Whilst this is widespread practice, we would have been delighted had we seen Fareham BC take a more proactive approach, and identify the best strategic vision for the future development of Fareham, and then go out and seek specific sites to progress the furtherance of that vision. Paragraph 14 of the NPPF states that “local planning authorities should positively seek opportunities to meet the development needs of their area”, whereas we see the call for sites as a rather more reactive approach. The Council’s Corporate Strategy Vision 2017-2023 is only in draft form and so cannot have fulfilled this function.

CPRE is, however, happy to support the principles behind the Fareham Local Plan Vision (pages 11-12), but remains of the opinion that this vision did not proactively drive the site selection, which simply resulted from the call for sites.

CPRE is also pleased to support the principles underlying both the 13 Key Strategic Priorities (pages 12-13), and the 15 Site Selection Priorities (pages 18-19) but has concerns that these aspirations have been mooted in the past and not entirely successfully achieved. We are optimistic for a better outcome from this Local Plan.

Policy SP4 Fareham Town Centre

CPRE Hampshire is pleased to support this policy, and considers that 600 dwellings should be considered as a minimum target, as a sustainable location such as this could support very high-density development. We are not suggesting high-rise development, but terraced streets would be entirely appropriate for this Georgian town centre. We propose an alternative strategy of a higher number of dwellings in Fareham Town Centre, by way of brownfield sites and regeneration, thus releasing the more sensitive greenfield sites. We would appreciate an opportunity to discuss this further.

Policies SP5 Development in the Countryside and SP6 Countryside Gaps

Historically in South Hampshire, countryside and gaps (even strategic ones) have not withstood development pressure, and so CPRE would like to request that the Council take this Local Plan process as an opportunity to evaluate how a new Green Belt could help to protect these precious green corridors in perpetuity. CPRE Hampshire would be happy to discuss this further with the Council.

The NPPF identifies five purposes of Green Belt (para 80) and these are all of relevance in Fareham, and indeed to much of South Hampshire:

- check the unrestricted sprawl of large built-up areas
- prevent neighbouring towns merging into one another



- assist in safeguarding the countryside from encroachment
- preserve the setting and special character of historic towns; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land

Whilst new Green Belts should only be established in exceptional circumstances (para 82) eg planning for larger scale development such as new settlements or major urban extensions, CPRE believes that these exceptional circumstances exist in South Hampshire.

Policy SP7 New Residential Development in the Countryside

CPRE requests that an additional point about light pollution be added to the last paragraph.

Policy H1 Strategic Housing Provision

CPRE notes that FBC have used the PUSH Spatial Position Statement (June 2016) to fulfil a large part of the statutory duty to co-operate under Section 110 of the Localism Act 2011, and state that its purpose is to inform the preparation of Local Plans by each Council within PUSH. However, the derivation of the PUSH Spatial Position Statement and how it differs from the detailed calculations of the PUSH SHMA (January 2016) is not clear to us. We would appreciate an opportunity to discuss this further.

The PUSH SHMA of January 2016 stated that Fareham's objectively assessed housing need was 10,500 over the period 2011-2036 (420dpa). This compares with the demographic household projections for Fareham over the period 2011-2036 which is 9,485 households (56,220-46,735), which equates to 380 dpa. This projection includes people being born, dying, marrying, divorcing, reaching 18, migrating etc and is carefully balanced out across the entire country so that people are not double-counted.

Fareham's annual target from the PUSH Spatial Position Statement was 455 dpa from 2011-2034, equating to 10,460 dwellings. But this presumably includes an element of encouraging people into the borough to drive economic growth and also an increase over and above the demographic requirement to try to fund affordable housing. This means that people are being double-counted, unless you subtract those people from some other district or borough. This has not been taken into account in the GL Hearn PUSH figures.

The new OAN proposal recently out for consultation from DCLG gives Fareham a target of 531 dpa from 2016-2026, which includes the base demographic projection



for that period (which is 401 dpa) and then adds an uplift as Fareham is deemed to be an expensive place to live. This would result in a figure of 13,275 households. This latter figure would by our calculations amount to a 39.96% increase over the bare ONS demographic forecasts. The theory being that if you over-supply an expensive area then house prices will come down. The problem is that house pricing is not simplistically driven by supply and demand, but by many other factors such as mortgage availability and rates, investor purchases for buy-to-let or as a safe haven for overseas funds. And new builds only comprise a very small percentage of the overall market and are unlikely to have enough magnitude even under these proposals to change market forces. Furthermore, if by massively exceeding demographic demand, the house prices actually did come down, then firstly the builders would stop building (as their profits would slump) and secondly every existing house owner would be in negative equity. And we would be back to a sub-prime crash again as in 2007. There are surely other policy initiatives which could enable young people to get onto the housing ladder.

It is a complex task to try to compare all the different time scales, and then to convert dpa requirements into allocations over a plan period. It is also worth noting that a plan never runs for an entire period, and is updated/reviewed about every 5 years, which makes the whole task of looking ahead to 2036 fairly meaningless. And there are new demographic projections due in 2018 which could change those currently being used. Nonetheless, under either the FBC/PUSH scenario or that proposed in the OAN consultation, it appears that Fareham is being expected to take more than its own indigenous need should suggest.

Policy H2 Provision of Affordable Housing

CPRE are pleased to see the study completed by the Health and Housing Partnership (July 2017) which demonstrates the Council's aspiration to provide housing that is actually needed by young families, older people and those who are unable to afford the market prices normally presented by mainstream developers.

However, we feel that Policy H2 is not ambitious enough, and a lower threshold than 11 dwellings should be set, perhaps on a sliding scale.

Policy E4 Employment Development Outside of the Urban Area

CPRE requests that an additional point about light pollution be added to point (i).

Policy E5 Boatyards

CPRE requests that an additional point about light pollution be added to point (f).



Policy R1 Hierarchy of Centres: Protecting the Vitality and Viability of Centres

CPRE Hampshire supports this policy.

Policy CF2 Community and Leisure Facilities Outside of the Urban Area

CPRE requests that an additional point about light pollution be added to point (b).

Policy CF5 Green Infrastructure

CPRE supports this policy.

Policy NE1 Landscape

CPRE supports this policy.

Policy INF2 Sustainable Transport

CPRE would like to see some proposals for how electric and possibly driverless cars can be incorporated into the network, and how planning must future-proof for these and other technological advances and eventualities.

Allocations

CPRE has been unable to find a copy online of the Brownfield Register for Fareham (agenda item for Development and Review Panel 7th November 2017) but would suggest that the outcome of the Register should be compared with the sites currently proposed in the draft Local Plan to ensure that all possible brownfield sites have been included to prevent unnecessary loss of greenfield sites.

In conclusion, we thank Fareham Brough Council for this opportunity to comment on their draft Local Plan and hope that our suggestions can be seen as positive and constructive.

Many kind regards,

CPRE Hampshire