

Planning Strategy Team  
Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
Hampshire  
PO16 7AZ

Your Ref: Reg 18 consultation  
Our ref: Fareham LP

27th February 2020

Dear Gayle,

**RE: Regulation 18 Local Plan Consultation (13th January - 1st March 2020)**

Thank you for the opportunity to comment on your Regulation 18 Local Plan Consultation and for taking the time to meet with myself and Jill Lee to discuss the Local Plan and initial thoughts on a Statement of Common Ground.

It is noted that this is a consultation on the "Supplement" only and is restricted to proposals for additional housing sites, two potential Strategic Growth Areas and new policies on development and the natural environment. Winchester City Council has submitted previous comments in respect of earlier consultations on the draft plan.

Housing numbers.

The Supplement addresses the higher housing figures which have arisen from the Government introducing its Standard Methodology and as a result the supplement includes additional housing allocations and identifies two Strategic Growth Areas which have the potential to accommodate both Fareham's additional housing need and neighbours unmet housing need should it arise.

The increase in housing provision is welcomed. In comments on the previous draft plan consultation, Winchester City Council stated that it would support additional housing allocations to meet the increased housing need. We welcome the fact that you are meeting your own housing need with a buffer and also making provision to accommodate an as yet unknown unmet need housing need through the identification of two additional Strategic Growth Areas.

We have no particular comments to raise in respect of the additional site allocations which are largely within your developed area and are not considered to impact on Winchester City Council's area.

We welcome the fact that the Meon Valley strategic gap will be protected from development as it is close to one of the proposed new Strategic Growth Areas. The



boundary of the Meon Valley strategic gap is proposed to be amended to ensure that it fulfils its primary function of preventing settlement coalescence and Winchester City Council suggests that the boundaries of the gap within Winchester's district should be taken into account during this process to ensure conformity over the administrative boundary. We suggest that this matter could be addressed through the Statement of Common Ground which will be prepared between our two authorities under Duty to Cooperate. It may also be helpful if this was reflected in the supporting text of paragraph 2.9 where the text refers to the amendment of the boundaries which should be undertaken in consultation with Winchester City Council.

Comments on additional policies:

### **Policy XX: New Small – Scale Development outside defined urban areas.**

This policy refers to the potential for allowing some small scale sustainable development in the countryside subject to a list of criteria. The text of the policy may be open to interpretation / argument and it is suggested that the list of requirements / sustainable indicators is included within the policy rather than the supporting text.

### **NEXX Trees, Woodland and Hedgerows.**

The reference to compensation is not understood. Is this mitigation or is it a net gain calculation? What is the compensation – financial contribution towards a larger net gain scheme? This should be clarified.

### **NEXX Managing Flood Risk and Sustainable Drainage Systems.**

Second set of bullet points – This policy should apply to **all** developments that incorporate Sustainable Drainage Systems rather than developments that **are required** to incorporate.....

### **NEXX Climate change.**

The aims of this policy are not very clear as we understand from our meeting that it is intended to be an overarching policy with the detail contained in further policies in the existing draft plan with which it is intended to be read. In its current form, it makes reference to details which are not necessary if this is intended to be a high level strategic policy.

For example the policy refers to higher water efficiency standards but it is not clear from the text what standards are expected.

We recommend the following RTP1 document which gives some good examples of positive policies to counter the effects of climate change

<https://www.rtpi.org.uk/media/3152143/Rising%20to%20the%20Climate%20Crisis.pdf>

We do hope that these comments will be helpful to you and we would be happy to discuss any of the above points with you.

Yours sincerely,

A black rectangular redaction box covering the signature of the sender.

Winchester City Council