

# Comment on the Draft Fareham Local Plan 2036

## How to have your say

Complete this form to comment on the Draft Local Plan. Please submit it to the Council by Friday 8 December 2017. You can download the pdf and type on to it before emailing it back to [consultation@fareham.gov.uk](mailto:consultation@fareham.gov.uk). You can leave more than one comment.

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Please provide the proposed policy, page number or paragraph number in the Draft Local Plan or Evidence Base you want to comment on

Please comment below.

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Organisation/Company (if you are representing one)

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Town

Postcode

**Your agent's details (if applicable)**

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Organisation/Company (if you are representing one)

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**Bargate Homes Ltd**

**Land East of Brook Lane, Warsash**

**Representations on Draft Fareham Local  
Plan 2036**

**December 2017**

## Document control

Document:	Representations on Draft Fareham Local Plan 2036
Project:	Land East of Brook Lane, Warsash
Client:	Bargate Homes
Job Number:	HP15092

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[Redacted]	

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Date:	8 <sup>th</sup> December 2017
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- 5.0 Policy H7: Self and Custom Build Homes

## **Appendices**

- Appendix 1 Illustrative Masterplan

## **1.0 Introduction**

- 1.1 These representations have been prepared by WYG on behalf of Bargate Homes Limited who control land east of Brook Lane, Warsash (SHLAA ID 3019) and focus on those parts of the draft Local Plan that are of particular relevance to our client's interests in that regard.
- 1.2 An outline planning application for the development of up to 140 dwellings has been submitted to Fareham Borough Council (P/17/0752/OA) and we understand it will be reported to the January 2018 Planning Committee with no objections from any statutory consultees. A copy of the Illustrative Masterplan that forms part of the application is included at Appendix 1.



## 2.0 Policy DA1: Development Allocations

2.1 Policy DA1 allocates Land North and South of Greenaway Lane for residential development with an indicative capacity of 700 dwellings. The allocation includes our client's land east of Brook Lane.

2.2 Bargate Homes support the principle of the allocation but wish to raise a number of concerns about the details of the allocation as set out further below.

### Contribution towards Housing Supply

2.3 Government policy in the form of the National Planning Policy Framework requires local planning authorities to *'boost significantly the supply of housing'* (paragraph 47, NPPF). National Planning Policy Guidance also advises that local planning authorities *'should aim to deal with any under-supply within the first 5 years of the plan period where possible'* (paragraph 035 Reference ID: 3-035-20140306, NPPG).

2.4 The commitment to boost housing supply has recently been reinforced as part of the Government's Budget announcement in November 2017 where the Chancellor of the Exchequer confirmed that housebuilding is the *"number one priority"* in the Budget and set a target of delivering 300,000 homes per year.

2.5 In line with national policy, Bargate Homes' site at Brook Lane can deliver a material amount of housing in the short term. A planning application is currently lodged with the Council and confirms that there are no site constraints that would prevent it being delivered quickly. The site is capable of delivering 20 dwellings in 2018/19 and 40 dwellings per year for the following three years (ie. 140 dwellings within the next five year period). This would allow adequate time for the outline and reserved matters planning application to be approved, legal agreements to be signed and conditions discharged with delivery starting in 2018/19.

2.6 Bargate Homes is an owner operated regional housebuilder which has grown significantly in recent years and in the last year delivered about 130 homes across Dorset, Hampshire and West Sussex.

- 2.7 When seeking planning permissions on their sites this is with the intention of building them out as soon as is feasibly possible, unlike certain Applicants, who only promote land and sell onto housebuilders once an outline consent is obtained.
- 2.8 The business is run by a Board of Directors which are 'hands-on' in their involvement in the day to day running of the company. They are backed by the Prowting Family (who formerly owned Banner Homes) and by a £25 million Revolving Credit Facility (RCF) with the Royal Bank of Scotland which enables them to deliver sites in a timely way with no 'landbanking'.
- 2.9 The proposals can therefore deliver housing within the next five years to address the past under-supply in a timely manner in accordance with Government policy.

### **Site Allocation HA1**

#### Site Allocation Plan

- 2.10 The red line delineating the housing allocation on page 137 includes number 28 Brook Lane. This property does not form part of the land promoted for residential development and should be omitted from the allocation – see the Illustrative Masterplan at Appendix A which shows that this land is omitted.

#### Allocation Requirements

- 2.11 The requirements (a) – (i) are overly prescriptive and do not allow sufficient flexibility in delivery. We are concerned that the necessary technical and environmental information has not informed the Development Framework Plan and as such it is inappropriate to require development proposals to be consistent with this Plan. At the very least, the wording of criterion (a) should be amended to *'The design and layout of proposals should be informed by and be broadly consistent with the Development Framework Plan...'*
- 2.12 Similarly, to allow flexibility, criterion (b) should be amended to read *'The quantum of housing proposed shall be broadly consistent with the indicative site capacity'*. This would be consistent with the wording of other allocations in the draft Plan.

- 2.13 Criterion (h) is too restrictive. The decision over which trees should be retained must be made at planning application stage in the context of a tree survey, site masterplan and landscaping plan taking into account opportunities for additional tree planting.
- 2.14 Criterion (i) should be amended to refer to not just national legislation on pooling contributions but to the CIL Regulations as a whole, as does the final paragraph of the Site Allocation.

### **Appendix C: Draft Development Framework – HA1**

#### Introduction and Purpose

- 2.15 This provides helpful clarification that the Development Framework is the Council's preferred approach, but not the only approach. This needs to be reflected in the Site Allocation HA1 text which is much more prescriptive.

#### Public Open Space

- 2.16 The final paragraph refers to a pedestrian link to Victory Hall. The Victory Hall Management Committee has set out in their representations on the current planning application at our client's site that they do not want such a connection. In this context, it would appear appropriate to remove all such references as well as the suggested connection point on the Development Framework Plan.

#### Dwelling Mix

- 2.17 The appropriate dwelling mix will be informed by a wide range of factors including viability and market conditions and is likely to change over time. As such the mix shown in Table A1 should not be seen as a definitive mix and this should be made clear in the text introducing the table.

Density Assumptions and Development Form

- 2.18 Again, this section is very prescriptive using terminology such as 'The development must...' and setting development densities. The wording should be amended to allow greater flexibility once the detailed site assessments have been undertaken.

Development Framework Plan

- 2.19 As above, the red line delineating the housing allocation should be amended to omit number 28 Brook Lane.
- 2.20 The dashed yellow line on the plan is not included in the key so it is not clear what it is illustrating. It is assumed to be the principal roads within the site but this needs to be clarified. Again, this level of detail is inappropriate at this stage and is better considered as part of a detailed masterplanning exercise.
- 2.21 There is no justification for the 'habitat to be protected / incorporated / enhanced' at the eastern portion of my client's site. This should be removed.
- 2.22 The extent of the 'public open space and habitat corridor' at the centre of my client's site is excessive. There is no ecological justification for such a large area and it should be reduced to a similar area to that shown on the attached Illustrative Masterplan.
- 2.23 In order to ensure that both ends of my client's site are accessible, it is necessary for a vehicular access to cross the green corridor at the centre of the site. This is proposed as part of the current outline application (see Illustrative Masterplan at Appendix 1) and there are no objections from statutory consultees (including the Council's Ecologist) to this arrangement. The Development Framework Plan should be amended to include this link.

### **3.0 Policy H2: Provision of Affordable Housing**

- 3.1 Paragraph 173 of the National Planning Policy Framework (NPPF) sets out that plans should not set out obligations that would threaten the viability of the sites and scale of development that is being proposed in the plan.
- 3.2 Policy H2 is aligned with national policy as set out within the written Ministerial Statement of 28th November 2014 and paragraph 31 of Planning Practice Guidance (ref: 23b-031-20161116), in that affordable housing is only sought on development of 11 units or more. The justification behind the national policy is clear; it seeks to ease the disproportionate burden of developer contributions on small scale developer, thereby encouraging more small and medium scale house builders to improve competition and variety. The acknowledgement of this national policy requirement in Policy H2 is supported by Bargate Homes.
- 3.3 In addition, the requirement for 30% affordable housing provision as set out within Policy H2 is well evidenced by the Local Plan Viability Assessment which is considered robust. The acknowledgement of viability within Policy H2 is welcomed and enables the policy to be operated with a suitable degree of flexibility where the need for that is robustly justified.
- 3.4 However, policy requirement a) which necessitates the provision of 10% of the overall dwellings on site as affordable home ownership products is somewhat ambiguous. The supporting text to the policy at paragraph 5.19 seems to suggest that this 10% provision is for starter homes and it is not clear from the current wording of the policy how this requirement affects the provision of other more traditional affordable tenures including shared ownership. Paragraph 5.18 identifies a notional 65:35 affordable rent to affordable home ownership products which is derived from the PUSH SHMA, but which appears to exclude starter home provision. Bargate Homes supports the inclusion of starter homes within the definition of affordable housing under Policy H2 but requires greater clarity on the split of tenures sought by the policy.



- 3.5 Policy H2 is consistent with national policy, it is well evidenced and provides a suitable degree of flexibility and it is therefore considered generally sound, subject to greater clarity on the housing tenure requirements.

## **4.0 Policy H4: Adaptable and Accessible Housing**

- 4.1 Bargate Homes agree with paragraph 5.39 that the viability implications of the category 3 optional standard for wheelchair accessible homes should be fully tested in advance of the plan being adopted. This is because the cost implications of this standard are likely to have implications on the viability of development proposals and therefore the ability to deliver necessary affordable homes and infrastructure requirements. Without such evidence, this part of the policy should be deleted.

## 5.0 Policy H7: Self and Custom Build Homes

- 5.1 Custom build and self-build development is an important part of the Government's agenda to widen the choice of homes and encourage greater variety by supporting small and medium size housebuilders. The need for self and custom build plots is recorded through registers kept by Councils and a duty has been placed on LPAs to grant planning permission to satisfy this need in full. The need identified on FBC's register has not been factored into the Objectively Assessed Housing Need (OAHN) reported in the GL Hearn April 2016 update report. Whilst there may be some overlap between the need identified on the register and the OAHN, based upon the evidence provided in support of the draft Local Plan the assumption should be that the need for self/custom build is distinct from the OAHN as a specialist form of housing.
- 5.2 On this basis, Policy H7 is therefore flawed. By requiring 5% of plots to be provided on all sites over 100 units as self/custom build this may have the implication of diminishing the contribution of such sites towards satisfying the full OAHN. There is also the risk that Policy H7 could leave a significant number of self-build plots empty if the demand for such development does not exist or if those on the register do not have the ability to build their own homes.
- 5.3 The report prepared by Adams Hendry in January 2017 considering self and custom build housing need in Fareham identifies a need for 20 plots at a specific point in time. However, this is demonstrably out-of-date with Fareham Borough Council's self-build register currently identifying a total need for 97 plots. The evidence base supporting the Local Plan is therefore out-of-date and does not accurately reflect the total need for self/custom build housing land.
- 5.4 The requirements of Policy H7 are therefore arbitrary, and are not properly evidenced. It is considered that the policy is too blunt and may negatively impact the ability of Fareham Borough Council to meet its objectively assessed needs. Paragraph 14 of the National Planning Policy Framework (NPPF) requires Local Plans to be flexible and able to adapt to rapid change. Self/custom building housing is a dynamic housing need that can vary considerably year-on-year and therefore a more dynamic policy is required that enables the



requisite amount of self/custom build development land to come forward without prejudicing the Council's ability to meet its OAHN.

- 5.5 It is not clear whether the Council have considered alternative approaches to the delivery of self-build plots. It is important that the Council examines all options in line with PPG before placing additional burdens on the development industry, which may have the unintended consequence of prejudicing the Council's ability to meet its full OAHN. The PPG also sets out in paragraph 57-025 that the Council should seek to encourage landowners to consider the provision of self-build plots and facilitate access where they are interested. The approach taken by the Council clearly goes beyond encouragement as it requires the provision of plots.
- 5.6 If the Council consider that a quota based policy is the preferred approach to satisfying the self/custom build need in Fareham, and provided that it can be demonstrated that this would not affect the Council's ability to satisfy its OAHN in full, then a more flexible approach should be adopted. For example, the proportion of plots being brought forward as self-build should only reflect the need demonstrated on the register. This should also factor in locational choice as clearly demand exhibited in one part of the Borough is specific to that location and it would be unreasonable to expect those on the register to satisfy their need elsewhere. If a specific quota is applied then this should be regarded as a starting point for negotiations and with the relevant caveat that such a requirement could be set aside or reduced on the grounds of viability.



## **Appendices**



## **Appendix 1**

### Illustrative Masterplan





- Application Boundary
- Retained main badger sett
- Existing Trees
- Proposed Trees
- Proposed Scrub Planting
- Post and Rail fence and planting to prevent access to badger protection zone
- Existing Boundary Vegetation to be retained and enhanced
- Potential informal pedestrian route



NOTES

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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
A	Colouring of revised plan following informal submission.	24.11.17	TB	-

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PROJECT

Land at Brook Lane

Warsash

For: Bargate Homes

DRAWING

Revised Illustrative Masterplan

SCALE	DATE	AUTHOR	CHK'D
1:1000 @ A2	31.10.17	TB	-

JOB NO.	DRAWING NO.	REV
A095939	RMP-01	A