

Fareham Borough Local Plan
Regulation 18 Draft Version



December 2017

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1. INTRODUCTION

1.1. Background

1.1.1. These representations are made by Gladman Developments Ltd. (hereafter referred to as “Gladman”). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2. Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.

1.1.3. Gladman has been involved in contributing to the plan preparation process across England through the submission of written representations and participation at local plan public examinations. It is on the basis of that experience that these representations have been prepared.

1.2. Structure of Representations

1.2.1. These representations are structured to follow the consultation document and will cover the following key topic areas:

- Housing White Paper
- Legal Compliance
- Duty to Cooperate
- Sustainability Appraisal
- Objectively Assessed Needs and Housing Target
- Spatial Strategy
- Site Allocations

1.3. Plan Making

1.3.1. The Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet

requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2. NATIONAL PLANNING POLICY AND GUIDANCE

2.1. National Planning Policy Framework

2.1.1. The National Planning Policy Framework (the Framework) makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that Local Plans should meet full objectively assessed needs (OAN) for housing.

2.1.2. The Framework has been with us now for over five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. Crucially, the Framework sets out the Government's commitment to 'significantly boosting the supply of housing' and how this should be reflected through the preparation of Local Plans, it is imperative that the emerging Fareham Borough Local Plan (FLP) is formulated on the basis of meeting this requirement. In this regard, §47 of the Framework sets out specific guidance that local planning authorities should take into account when identifying and meeting their objectively assessed housing needs and states:

'To boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements...
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15.'

2.1.3. The starting point of identifying objectively assessed housing needs is set out in §159 of the Framework, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects for the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (§158).

2.1.4. Once a local planning authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (§14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net

gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (§152).

2.1.5. To be considered sound at Examination the emerging FLP will need to meet all four of the soundness tests set out in §182 of the Framework. Paragraph 182 states:

“A local planning authority should submit a Plan for Examination which they consider is ‘sound’ – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with policies in the Framework.”

2.2. Planning Practice Guidance

2.2.1. As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing Local Plans, further updates to the PPG have been made in the intervening period. The PPG on Housing and Economic Development Needs in particular provides a clear indication of how the Government expects local planning authorities to take account the requirements of the Framework when identifying their objectively assessed housing needs. In summary the Housing and Economic Development Needs chapter of the PPG states:

- Plan makers **should not apply constraints** to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints.
- Household projections published by the Department for Communities and Local Government should provide the **starting point** estimate of overall housing need.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.

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- Where the supply of working age population that is economically active is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how much the location of new housing or infrastructure development could help address these problems.
 - If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.
 - Plan makers should take account of concealed households.
 - Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Appropriate comparisons of indicators (land prices, house prices etc.) should be made – with longer term trends in the HMA, similar demographic and economic areas, and nationally. Divergence under any of these circumstances will require upward adjustment to planned housing numbers.
 - The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
 - Market signals are affected by a number of economic factors. Plan makers should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability.

3. FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER FEBRUARY 2017

3.1. Overview

- 3.1.1. The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 3.1.2. Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.
- 3.1.3. The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 3.1.4. Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that ‘the housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.’
- 3.1.5. Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 3.1.6. The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 3.1.7. The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 3.1.8. Local planning authorities have a responsibility to do all that they can to meet their housing requirements, and the Local Plan represents an important policy tool to ensure local needs are met in full.
- 3.1.9. Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.
- 3.1.10. Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are

opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.

- 3.1.11. Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 3.1.12. The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that it fulfils the Government's agenda and provides the homes that its local communities need.

4. LEGAL COMPLIANCE

4.1. Duty to Cooperate

- 4.1.1. The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 4.1.2. Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration¹ as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Fareham Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation.

4.2. Sustainability Appraisal

- 4.2.1. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 4.2.2. The Local Plan should ensure that the results of the SA process clearly justify its policy choices, including the proposed site allocations and the approach taken to new growth when judged against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. The Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.

¹ PPG Reference ID. 9-011-2014036

5. OBJECTIVELY ASSESSED NEED

5.1. Background

5.1.1. The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

5.1.2. The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying:

“The scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- Meets household and population projections taking account of migration and demographic change;
- Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.”

5.1.3. Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a 3% housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

5.1.4. The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. The

implications of OAN following the High Court Judgment in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies... The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “Here, numbers matter; because the larger the need, the more pressure will or might be applied to infringe on other inconsistent policies”.

5.1.5. Therefore following the exercise to identify the full OAN for housing in an area,

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

5.1.6. This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

5.1.7. The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or

- specific policies in this Framework indicate development should be restricted.”

5.1.8. It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

5.1.9. Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

5.1.10. The PPG contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

5.2. South Hampshire Strategic Housing Market Assessment (PUSH)

5.2.1. Having considered the SHMA and subsequent update covering the Fareham Borough area Gladman do not consider this assessment derives the full objectively assessed housing need for the authority. Gladman note the starting point is still based on the 2012 household projections despite the 2014 household projections having been released in July 2016. The Strategic Housing Market Assessment will, at the very least, need to be revisited to consider the implications these projections may have for housing needs in Fareham and other authorities in the Housing Market Area (HMA).

5.2.2. Considering the current SHMA, which supports the plan, Gladman note there has only been a minimal uplift to account for concealed households and no further uplift to account for other market signals such as affordability. Gladman find it highly unlikely that this can be justified when parts of the HMA’s lower quartile house price is nearly ten times greater than lower quartile earnings. Justifying this approach by stating that affordability ratios are lower in comparison to the South East Region, when taken as a whole, is inappropriate as the South East has chronic affordability issues. Many Local Plans in the south east, that have reached examination, have been required to factor in an uplift for these high levels of unaffordability, commonly an increase of at least 10% to the OAN but even as high as 25% in some cases. Canterbury and Waverley are notable recent examples.

5.2.3. The recent government consultation Planning for the right homes in the right places, following on from the Housing White Paper, sets out governments proposed approach for the introduction of a

standardised OAN calculation. The idea behind this methodology is to uplift demographic projections in an attempt to combat housing affordability issues, simplifying the process whilst accounting for other market signals through this uplift. Through this uplift Fareham's baseline is increased in the region of 30% to account for affordability and as such Gladman therefore consider that an uplift to account for affordability is urgently required and suggest that the Council may wish to revisit the proposed housing requirement during the production of the publication version of the plan, whilst also considering the most recent household projections.

- 5.2.4. It is the intention for this new methodology to take effect from March 2018, which if the Council were to follow the proposed Local Development Scheme would mean that that plan needs to take account of this new methodology in order for it to be sound. It is for these reasons that Gladman suggest more is done now to work towards a figure that is closer to the proposed figure to avoid future complications and delay in the plan making process.
- 5.2.5. Whilst it is only a consultation it is highly likely that the housing requirement for Fareham and other authorities in the housing market area will see an increase and as such there will need to be a consideration in assessing any unmet need going forward which may have implications for the duty to cooperate. What is clear is that FBC will need to find more sites to meet its future housing requirement and Gladman suggest a proactive approach is sought now to avoid any future complications and unwarranted delays.

6. DEVELOPMENT STRATEGY

6.1. Context

6.1.1. This section of the representations is made in response to the policy options currently being promoted by the Council in the draft Local Plan. Gladman have reviewed the consultation documents and have a series of significant concerns regarding a number of policies being promoted which results in a plan that cannot be considered sound. Gladman's concerns relate to the following policies:

6.2. Strategic Policies

Policy SP1: Presumption in Favour of Sustainable Development

6.2.1. Gladman are supportive of the emphasis of Policy SP1. The Policy seeks to affirm the Local Planning Authority's commitment to making local planning decisions based on a presumption in favour of sustainable development. It provides assurance of a local approach to planning that will proactively seek to improve the social, environmental and economic well-being of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the Local Plan. The ethos of sustainable development is key to assessing planning proposals, it is the golden thread running through the Framework.

Policy SP5: Development in the Countryside

6.2.2. Gladman do not support the approach of this policy suggesting that it is too restrictive towards otherwise sustainable development. Whilst accepting it is the intention of this policy to protect the countryside and coastline from development that would cause adverse harm, it is suggested that the wording of this policy could and should be much more positive towards development in a countryside location that would not have adverse impacts on its character and appearance. It is not appropriate to impose an otherwise blanket restriction towards development in a countryside location and there should therefore be sufficient flexibility incorporated in the policy wording to recognise that suitable sustainable development may be needed in countryside locations.

Policy SP6: Development in Strategic Gaps

6.2.3. Gladman raise similar concerns to that of the countryside policy SP5 and suggest that flexibility should also be incorporated. Whilst accepting that the use of a strategic gap policy may be a reasonable policy response to prevent settlement coalescence this should not be a blanket restriction on all development in these gaps.

6.2.4. Gladman submit that new development can often be located in such gaps without leading to the physical and visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. As such Gladman suggest that this policy should

recognise it may be necessary to consider otherwise sustainable development in these gaps in some locations.

Policy SP7: New Residential Development in the Countryside

- 6.2.5. Gladman raise concerns with this this policy and the lack of flexibility provided for future residential development. There is no such presumption against residential development outside urban areas in the countryside within the Framework and Gladman questions the positivity of such a policy.
- 6.2.6. Gladman suggest such a restrictive policy could lead to the Council failing to demonstrate a rolling five-year housing land supply and a plan that is not positively prepared. Gladman therefore suggest that flexibility is incorporated in to the wording where development proposals adjacent to the urban area would also be considered positively. It is not considered appropriate for locations adjacent to the urban area to be treated in the same manner as a proposal in the open countryside. Gladman’s preferred approach would be for the Council to incorporate a criterion based approach where demonstrably sustainable development adjacent to the urban area would also be given positive consideration. This would help combat the issue regarding the insufficient level of allocations within the plan of which Gladman’s concerns will be detailed further below.

6.3. Housing

6.3.1. Policy H1: Strategic Housing Provision

- 6.3.2. Further to the concerns regarding the evidence base highlighted above Gladman raise concerns with the stepped approach to the housing requirement proposed in this policy. Gladman suggest that this is simply a mechanism to minimise the back log in housing delivery and delaying the provision of much needed new homes.
- 6.3.3. The SHMA has identified an annual housing need and these homes are therefore needed now, it is not considered appropriate to deliver these homes later in the plan period. Further, this will likely lead to worsening affordability in the Borough directly conflicting with the objectives of the Framework to boost significantly the supply of housing and the governments objective to tackle the unaffordability of housing.
- 6.3.4. Gladman suggest that additional sites must be found and brought forward in the first five years of the plan to make up the current backlog that this stepped approach is seeking to push further into the plan period. The PPG is clear that any backlog should where possible be addressed within the first five years of the plan and reducing the housing target of the early years of the plan to minimise shortfall would not result in a sound plan. Any deference from this preferred approach will need to be accompanied by robust evidence by the Council, Gladman do not consider that the Councils current evidence base is sufficient to justify its decision.

6.3.5. Policy H2: Provision of Affordable Housing

- 6.3.6. It is not considered appropriate to be seeking a contribution from older people’s accommodation towards affordable housing. This is a specialist provision which is already making an important contribution to the specialist housing needs of Fareham.

Policy H7: Self and Custom Build Homes

- 6.3.7. Gladman would welcome the addition of a policy in relation to self-build housing within the Local Plan. This would be in line with current government thinking and objectives. It is key that the development industry is able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.
- 6.3.8. Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council’s viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk (paragraph 174 of the Framework).
- 6.3.9. Further to this, Gladman urge the Council to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered.

6.4. Development Allocations

Policy DA1: Development Allocations

- 6.4.1. Whilst having no specific comments to make on the individual allocations included within the plan Gladman suggest that to ensure delivery of the housing requirement further allocations will be required to ensure a buffer of sites to provide certainty about the plans ability to deliver the full housing requirement within the plan period.
- 6.4.2. Noting that the delivery of the housing requirement is very much reliant on the delivery of homes at Welborne Garden Village the Council should ensure that the current delivery assumptions are robust and that there is contingency within the plan should the scheme not deliver as envisaged. It is Gladman’s experience that schemes of this size can encounter unexpected delays which may have serious implications for the delivery of the Councils housing requirement.

6.4.3. Gladman note that there is currently a buffer of around 300 dwellings, additionally to the proposed housing requirement. Currently this would only require one year of delays and non-delivery at Welborne Garden Village for there to be serious doubts regarding the delivery of the housing requirement. Gladman therefore do not consider this to be sufficient buffer and suggest further sites are sought capable of delivery within five years to ensure a buffer of around between 10% to 20% additional sites above the housing requirement.

6.4.4. Searching for additional sites now would also ensure minimal delays with the plan preparation should the new standardised OAN methodology come in to effect as currently proposed.

6.5. Implementation and Monitoring

Review mechanism

6.5.1. Gladman note that currently there is no review policy within the plan and Gladman suggest that this should be a consideration of the Council. It is the intention of the Housing White Paper for plans to be reviewed every five years and Gladman therefore suggest that the plan would benefit from a policy within the plan that would introduce a commitment to review the plan in line with this.

7. CONCLUSIONS

7.1. Overall Conclusions

7.1.1. These representations have highlighted a number of fundamental concerns with the Fareham Local Plan. These concerns relate to issues at the heart of the Plan and therefore need to be addressed if the Plan is to be found sound when it reaches examination stage.

7.1.2. To be found sound at examination the Fareham Local Plan needs to meet all four tests of soundness outlined within paragraph 182 of the Framework.

“A local planning authority should submit a plan for Examination which they consider is ‘sound’ – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with policies in the Framework.

7.1.3. The key concerns identified within this submission are as follows:

- The current starting point for the OAN not being the latest household projections and the lack of uplift to the OAN to account for market signals.
- The stepped approach to the delivery of new homes to reduce previous shortfall and will delay delivery of much needed homes.
- The risk of non-delivery of allocations and unaccounted-for delays in the delivery of these allocations and the knock-on effect of the ability of the plan to delivery its overall housing needs
- The lack of flexibility towards development outside the Built-Up Urban Area despite housing needs likely to increase in the near future and the lack of contingency within the plan to ensure the housing requirement will be met.