

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. You can leave more than one comment.

Provide us with your details

Please provide your contact details at the end of this survey. Doing this will help us to understand where people's views are coming from. Your name and address may be published but it will not be used for any other purposes.

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.

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.

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.

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.

A bit about you

You will need to provide your contact details at the end of this survey. This is a legal requirement in order for your comments to be taken into account and your address may be published. It will not be used for any other purposes.

Your details

Name

Organisation/Company (if you are representing one)

Address Line 1

Address Line 2

Address Line 3

Town

Postcode

Your agent's details (if applicable)

Name

Organisation/Company (if you are representing one)

Address Line 1

Address Line 2

Address Line 3

Town

Postcode



Bargate Homes Ltd

Land East of Newgate Lane, Fareham

**Representations on Draft Fareham Local
Plan 2036**

December 2017



Document control

Document:	Representations on Draft Fareham Local Plan 2036	
Project:	Land East of Newgate Lane, Fareham	
Client:	Bargate Homes	
Job Number:	HP16040	

Revision:	1st Draft	
Date:	6 th December 2017	
Prepared by:	Checked by:	Approved By:
██████████	██████████	██████████

Revision:	Final	
Date:	8 th December 2017	
Prepared by:	Checked by:	Approved By:
██████████	██████████	██████████



Contents

- 1.0 Introduction
- 2.0 Policy DA1: Development Allocations
- 3.0 Policy H2: Provision of Affordable Housing
- 4.0 Policy H4: Adaptable and Accessible Housing
- 5.0 Policy H7: Self and Custom Build Homes



1.0 Introduction

- 1.1 These representations have been prepared by WYG on behalf of Bargate Homes Limited who control land east of Newgate Lane, Fareham (SHLAA ID sites 3002 and 3129) 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 Site 3002, to the east of Newgate Lane South, forms part of draft Site Allocation HA2. The land that makes up this allocation is in three separate ownerships.
- 1.3 Site 3129 lies to the west of Newgate Lane South and has not been allocated for development in the draft Local Plan.
- 1.3 Both sites have previously been promoted for development as part of the Council's Call for Sites in December 2015.



2.0 Policy DA1: Development Allocations

- 2.1 Policy DA1 allocates 'Land at Newgate Land South' for residential development with an indicative capacity of 475 dwellings.
- 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.
- 2.3 Our client also objects to the omission of Site 3129 from the allocation as this site is capable of making a significant contribution towards housing delivery in the short term as advocated by national planning policy.

Contribution towards Housing Supply

- 2.4 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).
- 2.5 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.
- 2.6 In line with national policy, Bargate Homes' land east of Newgate Lane can deliver a material amount of housing in the short term. Site 3002 is capable of delivering approximately 100 dwellings at a rate of 20 dpa in 2019/20 and 40 dpa in the following two years (ie. 100 dwellings within the next five year period). Site 3129 has previously been promoted for 125 dwellings and this could also be delivered in full within the next five years. This would allow adequate time for planning applications to be approved, legal agreements to be signed and conditions discharged with delivery starting in 2019/20.



- 2.7 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.
- 2.8 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.
- 2.9 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'.
- 2.10 Land east Newgate Lane 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 HA2

Site Allocation Plan

- 2.11 The ecological survey work for the Newgate Lane South road scheme has confirmed that my client's land and the land immediately to the north (SHLAA ID 3057) is not being used by overwintering birds. As such, the 'Uncertain Brent Geese & Wader site' designation should be removed from this plan and from the Borough wide Proposals Map.

Allocation Requirements

- 2.12 The requirements (a) – (j) 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...'*

- 2.13 Criterion (d) is too prescriptive in setting a specific minimum width for a north-south natural greenspace buffer. This should be informed by technical and environmental assessments and a masterplanning exercise at a later stage and the text should be amended to remove a specific width requirement.
- 2.14 Requirement (g) seeks to limit development to a maximum of 2.5 storeys, except for buildings fronting onto Newgate Lane South and Bridgemary/Woodcot where building heights will be limited to a maximum of 2 storeys. Bargate Homes are broadly supportive of this approach however, the current wording of the policy is too restrictive and it is considered that greater flexibility could be built into the policy in order not to curtail the development opportunities of the site. In this regard, the policy should be amended to read: *The height of buildings shall be generally limited to a maximum of 3 storeys, except for buildings which front onto Newgate Lane South and Bridgemary/Woodcot where building heights will be generally limited to a maximum of 2 storeys;*
- 2.15 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.
- 2.16 Criterion (i) should be amended to refer to not just national legislation on pooling contributions but to the CIL Regulations as a whole.

Collaborative Approach

- 2.17 We note the Council's aspiration for a comprehensive and coordinated approach to delivering the site set out in the penultimate paragraph of HA2.
- 2.18 Notwithstanding the comments above, Bargate Homes are committed to working collaboratively with the promoters of the other two land interests included within the draft allocation to deliver a high quality development in line with principles of an acceptable Development Framework. To that end, joint transport surveys are ongoing. Furthermore,

we affirm Bargate Homes' commitment to work with both the Borough and County Councils and other key stakeholders over the coming months.

- 2.19 The supporting text indicates that the Council will accept a phased delivery of the allocation. Bargate Homes seek clarification that this refers to separate planning applications being an accepted approach rather than the phased delivery of a single outline planning permission. Provided the individual applications accord with an acceptable Development Framework, such an approach would ensure a co-ordinated development of the allocation. It would also enable the timely delivery of individual parcels thereby making an important contribution to housing delivery in the short term as set out above.

Omission of Site 3129 (Land West of Newgate Lane South)

- 2.20 The Fareham Strategic Housing Land Availability Assessment (SHLAA) October 2017 confirms that this site is both available and achievable. It has existing residential development to the west and south and Newgate Lane South, currently under construction, forms its eastern boundary. There are no significant constraints to the development of the site and the assessment notes that *'Development could be accommodated without effects on the landscape character of the wider area (following the construction of Newgate Lane South)'*.
- 2.21 The site could also make a meaningful contribution towards housing delivery in the short-term as advocated by national planning policy. For all of the above reasons, we request that Site Allocation HA2 is extended to include the residential development of approximately 125 dwellings at my client's land at Site 3129.



Appendix D: Draft Development Framework – HA2

Introduction and Purpose

- 2.22 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.

Dwelling Mix

- 2.23 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.

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.