

Comment on the Draft Fareham Local Plan 2036

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Bargate Homes Ltd

Land South of Greenaway Lane, Warsash

**Representations on Draft Fareham Local
Plan 2036**

December 2017



Document control

Document:	Representations on Draft Fareham Local Plan 2036
Project:	Land South of Greenaway Lane, Warsash
Client:	Bargate Homes
Job Number:	HP17078

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

Revision:	Final	
Date:	6 th December 2017	
Prepared by:	Checked by:	Approved By:



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1.0 Introduction

- 1.1 These representations have been prepared by WYG on behalf of Bargate Homes Limited who control south of Greenaway Lane, Warsash (SHLAA ID 3005) and focus on those parts of the draft Local Plan that are of particular relevance to our client's interests in that regard.



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 south of Greenaway 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 south of Greenaway Lane can deliver a material amount of housing in the short term. The site is capable of delivering approximately 90 dwellings at a rate of 30 dpa between 2018/19 and 2020/21 (ie. 90 dwellings within the next five year period). This would allow adequate time for a 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

Allocation Requirements

- 2.10 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...'*
- 2.11 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.
- 2.12 Criterion (c) should not restrict the use of Greenaway Lane to serve only frontage dwellings. The capacity of Greenaway Lane to accommodate access to further dwellings should be assessed through detailed highways and environmental reports and should not be discounted at this early stage. Bargate Homes' highway consultant has advised that Greenaway Lane could safely accommodate traffic flows of up to 100 dwellings at this site without the need for a continuous footway, thereby minimising any impact upon the character of the Lane. Even if a footway were to be required, this would be for a limited

distance given the site's proximity to the junction with Brook Lane and, with a sensitively designed landscaping scheme, any impact upon character could be mitigated as necessary.

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.

Vehicular Access and Movement

2.16 As above, the allocation should not restrict the use of Greenaway Lane to serve only frontage dwellings.

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 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.
- 2.20 There is no justification for the wide area of 'habitat to be protected / incorporated / enhanced' at the western boundary of my client's site. This should be removed.
- 2.21 The 'public open space and habitat corridor' at the centre of my client's site is arbitrary. Whilst we do not object to the principal, the position and width of this corridor must be informed by technical and environmental information and a masterplanning exercise. We also do not consider it necessary to have two such corridors on my client's land – a single corridor would perform the function of providing a continuous north/south green 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.