

APPENDIX 1:

FAREHAM BOROUGH COUNCIL'S FULL RESPONSE – INCLUDING TECHNICAL/CLARIFICATION MATTERS - TO THE GOVERNMENT'S (MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT) CONSULTATION ON 'NATIONAL PLANNING POLICY FRAMEWORK: CONSULTATION PROPOSALS' (MARCH 2018).

Chapter 1. Introduction

Q1. Do you have any comments on the text in Chapter 1?

1. Paragraph 5 of the consultation document 'National Planning Policy Framework: Consultation proposals', states that the 'Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste.' From a technical point of view, it would be extremely helpful if the planning policy documents for traveller sites and for waste are fully integrated into the Framework and associated planning policy guidance for simplicity and clarity, which is clearly the intent of the reforms.

Chapter 2. Achieving sustainable development

Q3. Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

2. Fareham Borough Council has no comment on this specific question; associated matters are dealt with in the answers to other questions posed.

Q4. Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

3. It is recommended that when neighbourhood forums are established, the type of the proposed neighbourhood plan should be determined when designated. There should be two types of neighbourhood plan, one that allocates development and one that does not but may want to focus on, for instance design policies. Then it is clear from the outset what the purpose of the neighbourhood plan is, avoiding unnecessary local concern from the communities affected and aiding the focus of local authority resources supporting neighbourhood plans. Furthermore, those neighbourhood plans that allocate sites should have similar 'tests of soundness' that Local Plans require.
4. It is important that neighbourhood plans are in conformity with Local Plans, and there should be even more exacting requirements in the proposed guidance that where local and national protections are in place

through Local Plans, neighbourhood plans should also accord with these.

5. In respect to paragraphs 66 and 67 of the proposed changes, where it states that strategic plans (i.e. Local Plans) should set out a housing requirement figure for designated neighbourhood areas. This is further qualified by the statement that where it is not possible to provide a requirement figure for a neighbourhood area the local authority should provide an indicative figure. However, it is vague on the circumstances where a local authority, for valid reasons, does not allocate any housing requirement.
6. The subsequent statement is vague and open to interpretation 'This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.' It is unclear which factor takes precedence, yet when reading the proposed changes holistically, it appears to be the latter (i.e. most recently available planning strategy of the local planning authority'). This needs to be qualified further in future guidance.

Chapter 3. Plan-making

Q5. Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted upon?

7. The Council objects, in particular to paragraph 36 a), which references in the tests of soundness that a strategy will, 'as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using clear and justified method to identify needs), and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'.
8. To summarise, it is important to highlight that, like the Council's previous response to the Government last year to 'Planning for the right homes in the right places: consultation proposals', it emphasised that the Council was very concerned about the immediate and significant increase on housing requirements that the Government's proposed new standard method for calculating local need would have. This would in turn have an adverse and negative impact on the five-year housing land supply in the Borough and its local communities.
9. If the Government impose these consultation proposals, it would rapidly increase the level of housing need in the Borough and leave local authorities exposed to the potential requirements to accommodate the unmet need from neighbouring authorities.
10. These two aspects would have an immediate significant detrimental effect on the Council's five-year housing land supply position.

11. In addition, the Government is proposing a Housing Delivery Test (as detailed in the Government's consultation document 'Housing Delivery Test Draft Measurement Rule Book') potentially with a 2018 start date but using a retrospective three-year requirement. If imposed, this would rapidly further increase levels of future housing need, resulting in totally unrealistic housing delivery targets.
12. These proposed reforms are comprehensively and specifically targeted at local authorities to deliver. Local authorities, like Fareham, with negligible ownership of deliverable sites, can permit (i.e. determine planning applications for housing) but not deliver. The proposals, if fully imposed, would result in an immediate and unrealistic significantly increased level of housing need numbers to deliver.
13. All of this would lead to a wholly unaccountable decision-making process for local communities, as in effect national policy will simply dictate local planning decisions, further undermining the plan-led system and local authorities such as Fareham Borough Council.
14. Also, as the Council highlighted in its previous response to the Government proposals consulted upon last year, 'Planning for the right homes in the right places', if enacted, such reforms would significantly undermine the collaborative and beneficial work already undertaken by the Council and with the Partnership for Urban South Hampshire (PUSH).
15. Furthermore, the Council opposes the removal of reference to the Garden City principles, which are in paragraph 52 of the existing NPPF. It is vital that future national policy makes reference to these principles as they ensure place-making visions are established in garden villages and cities and to ensure delivery standards are met when delivering strategic housing sites.

The Government's Proposals on Objectively Assessed Need for Housing (the 'Standard Approach')

16. The first significant proposal is the expectation that a specifically nationally defined 'objectively assessed need' for housing is to be accommodated by local planning authorities (Councils). This includes meeting unmet needs from neighbouring authorities. This composite proposal features throughout the Government's consultation, particularly paragraphs 11.b) and 36.a) (as detailed in the Government's consultation document 'National Planning Policy Framework: Draft text for consultation'). For clarity, whilst the Government uses the term 'objectively assessed need', the same term the existing Draft Local Plan uses for housing needs (in line with current policy). However, the Government actually mean using a new proposed 'standard approach' to calculating housing need. This is later confirmed in the consultation document (in paragraph 61 of the Government's consultation document 'National Planning Policy Framework: Draft text for consultation') which states that the Government requires 'strategic plans' (i.e. strategic

policies in Local Plans) to be based upon a local housing need assessment 'using the standard method in national planning guidance.'

17. It is important to highlight, under the Government's proposed new standard method Fareham's housing need would rise from the existing 420 to a new target of 531, an uplift of 111 dwellings per annum, for at least ten years (2016-2026). This equates to some 1,110 additional homes required in the Borough, if the Government take these proposals forward. Given that paragraph 22 of the Government's proposed changes to national policy (as detailed in the Government's consultation document 'National Planning Policy Framework: Draft text for consultation') states that Local Plan (i.e. strategic) policies should look ahead over a minimum fifteen-year period from adoption. It could be inferred that the Government's standard approach is applied for a fifteen to twenty-year period for plan-making purposes, thus further increasing housing requirements.

The Implications of the Government's Proposed 'Standard Approach' for Calculating Housing Need on Fareham

18. The Government consulted on this new proposed standard method for calculating housing need through a previous consultation on 'Planning for the right homes in the right places' back in September 2017. At the time, as clearly expressed in a previous (6 November 2017) Executive Report, the Council fundamentally disagreed with this standardised approach and submitted a consultation response to the Government that stated its opposition. This opposition is repeated in this consultation response, with some additional emphasis, given the more detailed proposals contained in these recent Government proposals.
19. This standard approach imposed by Government, put simply, sets a baseline of housing need using data from the ONS (Office for National Statistics) on household growth projections (i.e. annual average household growth over a 10 year period), plus an adjustment factor based on local affordability (i.e. the higher the household income to price differential the more houses an authority should provide with the Government's proposed cap applied for those authorities who have reviewed and adopted their Local Plan in the last five years.
20. As previously stated, this would if enacted by Government, lead to an additional 1,110 home requirements over ten years up to 2026. This would, in effect, have an immediate and significant increase in the Borough's housing needs through this Government imposition of a standard approach. Furthermore, it is completely unreasonable to expect local planning authorities to apply a Government imposed standard approach retrospectively in terms of increased supply and delivery demands as a matter of principle.

The Government's Proposals for Councils to Have Agreements with other Authorities, so Unmet Needs from Neighbouring Areas is Accommodated

21. Furthermore, the Government also states that ‘the strategy’ (i.e. Local Plan) ‘is informed by agreements with other authorities, so unmet needs from neighbouring areas is accommodated’ (paragraph 36 of the Government’s consultation document ‘National Planning Policy Framework: Draft text for consultation’). The quantum of development needing to be accommodated would be established through a new requirement to produce ‘Statements of Common Ground’ (SOCG) between neighbouring authorities. It is clear from Government that SOCGs are designed in a manner that strategic matters are dealt with rather than deferred. The implications of this are that, if the Government enacts these reforms not only would, as a minimum, Fareham have a requirement for 1,110 additional homes, but the Council would also be required to have agreements in place, so unmet needs from other neighbouring authorities are accommodated as well.

Implications of Government Proposals for Authorities to Meet Unmet Housing Need from Neighbouring Authorities

22. There is a fundamental flaw in this approach in that different authorities are often at different stages of plan making, including their development of a proportionate evidence base to substantiate their approach to development. Therefore, if, say Authority A is in a more advance approach of plan-making, a neighbour, say Authority B, may not have sufficient evidence to substantiate their position of not being able to meet their need. These proposals could effectively slow plan-making down, adversely affecting Authority A from advancing a plan. Fareham Borough Council would therefore argue for an authority to successfully maintain it cannot meet its need, its Local Plan would need to have been adopted before a neighbouring authority would be expected to see if it could accommodate their need.
23. Furthermore, it appears that in the eyes of the Government, proposals for Local Plans to be considered sound, as a minimum, they need to meet the standard approach to housing.

The Government’s Proposals & Implications regarding the Presumption in Favour of Sustainable Development for Local Decision-making (i.e. housing planning applications)

24. Paragraph 11 (of the Government’s consultation document ‘National Planning Policy Framework: Draft text for consultation’) highlights that strategic plans (i.e. the Local Plan) ‘should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless’ the Government’s prescriptive criteria apply. This in turn, put simply, means Government’s proposed policies provide a specific reason for restricting development, such as green belt and national parks, however they are set out in a defined list rather than as examples, as in the present framework. Proposed national policy therefore gives authorities like Fareham very limited protections from development in valued locations in the Borough.

The Implications of the Government's Standard Approach to Housing Need on Fareham's Five-Year Land Supply

25. It is apparent that any shortfall in delivery of the Government's standardised housing figures will have to be met by those Council's affected within five years from adoption or review of a Local Plan, or from the introduction of the standardised method if enacted. Thus, potentially having a significant effect on a Council's five-year housing land supply position.
26. Paragraph 74 of the proposed changes to National Planning Policy Framework (within the Government's consultation document 'National Planning Policy Framework: Draft text for consultation') sets out a range of buffers, which should be added into the five-year land supply calculations. The Government explains that buffers are not cumulative, meaning that an authority should add either a 5%, 10% or 20% buffer. The Government's proposals make it clear that the supply of specific deliverable sites should include a buffer of 5% to ensure choice and competition, or 10% where they wish to demonstrate a five-year supply of specific deliverable sites (through an annual position statement or recently adopted plan), or 20% where there has been significant under-delivery.
27. The Government also state that 'local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement, or against their local housing need where the strategic plan is more than five years old.' This means, the Council should have an agreed annual position statement.
28. The Government's proposed standardised approach to calculating housing need and the implications for the Council's five-year housing land supply position, undermines both the existing adopted and emerging Fareham Local Plan 2036 (recently consulted upon). They potentially have immediate significant adverse effects on the Borough. These proposals present real dangers where unrealistic buffers are arbitrarily applied through Government policy and guidance, if the Council's well-reasoned objections are not listened to.

The Government's Proposed Housing Delivery Test (in relation to Five-year Housing Supply)

29. The Government's proposed Housing Delivery Test (HDT) is set out in the Government's consultation document 'Housing Delivery Test Draft Measurement Rule Book: Draft methodology to calculating the Housing Delivery Test'. HDT is the percentage measurement of the number of net homes delivered against the number of homes required in a plan-making authority over a previous three-year period (paragraph 2 of the Government's consultation document 'Housing Delivery Test Draft Measurement Rule Book').

30. It is clear the Government is proposing to use a standard housing need figure as the basis for calculating the HDT, particularly where local plans are out of date. The Government state that the HDT required figure will be used where it is lower than the adopted housing requirement or the local housing need figure and unmet neighbours' need figure (paragraph 3 of the Government's consultation document 'Housing Delivery Test Draft Measurement Rule Book').

The Government's Proposed Sanctions & Implications for those Authorities who do not meet the HDT or Five-year Housing Supply

31. The policy consequences of not meeting the HDT are outlined in paragraphs 74-77 of the Government's consultation document 'National Planning Policy Framework: Draft text for consultation').
32. Paragraph 75 of the Government's consultation (the Government's consultation document 'National Planning Policy Framework: Draft text for consultation') states that for planning applications for housing, paragraph 11d of proposed national policy would apply if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with an appropriate buffer), or where the Housing Delivery Test (HDT) indicates delivery of housing has been substantially below the requirement over the previous three years. Put simply, local planning authorities without a five-year housing land supply or failing the Housing Delivery Test would be open to development on developable sites not within adopted Local Plans that have been found sound and have involved engagement with local communities, along with the development industry and other interested parties. Therefore, this Council is strongly opposed to these Government proposals.
33. If the Government go ahead with these proposals, it is clear that there will be a requirement for Councils (local planning authorities) to produce an action plan where delivery has fallen below 95% of its' housing requirement over the three previous years. From November 2018, councils will also need to provide a 20% buffer on top of its five-year supply of deliverable sites, where delivery in the previous three years was below 85% of the housing requirement. From 2020, the presumption in favour of sustainable development will also apply where delivery is below 75% of the authority's housing requirement. Whilst not included in the revised NPPF draft, the consultation document clarifies that the application of the presumption will also apply where delivery is less than 25% of the housing requirement in 2018 and 45% in 2019.
34. This would act to further compound the unrealistic standardised housing targets imposed by Government, therefore in turn having a negative impact on the housing supply figures (five-year housing land supply) and delivery (Housing Delivery Test). These Government proposals, as the following paragraphs explain, mean that the Council will have little or no influence on achieving the unrealistic housing supply and delivery targets set by Government, further undermining plan-making and local decision-making for local communities.

The Council's Overall Response to the Government's NPPF Consultation

Council Opposition to a Non-Plan, Non-Led Locally & Accountable Planning System

35. Fareham Borough Council fundamentally disagrees with the proposed standard approach to assessing local housing need for the following reasons.
36. Fareham Borough Council has over many years worked jointly with other local authorities in south Hampshire area and key partners through the Partnership for Urban South Hampshire (PUSH). For clarity, PUSH is a partnership of Hampshire County Council; the unitary authorities of Portsmouth, Southampton, Isle of Wight; and district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester. The PUSH Local Authorities also work collaboratively with the Solent Local Enterprise Partnership, Environment Agency and other relevant bodies.
37. Whilst the PUSH Joint Committee has no statutory powers or functions, it plays a vital role in co-ordinating the preparation of sub-regional evidence and statements across the South Hampshire local authorities. The PUSH Local Authorities recognise the benefits of working together to support the sustainable economic growth of the sub-region and to facilitate the strategic planning functions necessary to support that growth, which is in line with current Government advice.
38. PUSH has been instrumental in agreeing a joined-up approach to addressing housing objectively assessed housing needs over three housing market areas (Southampton, Portsmouth and Isle of Wight). This is evident in the fact that the PUSH Local Authorities published a Spatial Position Statement in June 2016, which set out the overall need for, and a distribution of development in South Hampshire to 2034. This Statement draws on evidence from the South Hampshire Objectively Assessed Housing Need (OAHN) Update Report published in April 2016, which updates and complements the Strategic Housing Market Assessment (SHMA) published in 2014. Furthermore, there are a number of evidence documents prepared through joint working by the PUSH Local Authorities that have helped inform the PUSH Spatial Position Statement on a whole series of strategic planning matters.
39. It is considered that this is a more locally accountable, collaborative and 'bottom-up' approach to responding to local housing needs over three housing market areas by PUSH. This Council contends that it is preferable to the 'top-down' imposed standard approach to housing need currently proposed by the Government. Over a relatively short time period PUSH has established a joint position and evidence base from which individual authorities can progress their own Local Plans.
40. Unlike paragraph 9 of the previous consultation ('Planning for the right

homes in the right places'), these Government proposals nationally prescribe a definitive list of policies that provide specific reasons restricting development. Paragraph 9 of 'Planning for the right homes in the right places' explained that after establishing the number of homes that are needed in the area 'Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These included, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.' This is what Fareham Borough Council and PUSH have worked towards and established through the PUSH Spatial Position Statement. This has resulted in, for example, agreement between PUSH Authorities that the protection of important strategic gaps such as the Meon Valley (which sits between the housing market areas of Southampton and Portsmouth) is supported. The Government's further current round of consultation gives no or little protection to those authorities who have landscapes and countryside that do not fall under these listed designations but are clearly valued by local communities and the Council.

41. This continual changing of the goal posts by Government acts to undermine and slow-down those local authorities such as Fareham positively plan-making under the existing regimes, which are successfully working with their neighbouring authorities.

Council Opposition to Imposition of Unrealistic Increases in Housing Delivery Requirements

42. The impacts of the Government proposals in terms of timescales are completely unreasonable. They act to undermine the plan-led planning system, as well as the value local communities place in their involvement into Local Plans and the development industry. This, in turn, undermines local decision-making for local communities, who should have the reassurance of a plan-led planning system. There are no suitably robust provisions within the Government's proposals (even in relation to the Government's provisions for stepped trajectories) that support authorities to have 'realistic' trajectories given the Government's focus on standardising housing needs.
43. Fareham Borough Council have sought to develop a Draft Local Plan which maximises brown-field regeneration sites and provides a strategic site at Welborne Garden Village (for approximately 6,000 homes), as well as having draft allocations for four urban extensions and a combination of small to medium sites. If Government proposals are pursued, the Draft Local Plan and local-decision-making will be undermined by these unrealistic nationally imposed Government reforms. In conclusion, therefore Fareham Borough Council believes the

current approach should remain and the Government's new proposals should not progress.

Council Opposition to Reforms Purely Focused on Council for All Aspects of Housing Delivery

44. The Council questions the focused and continued emphasis on local planning authorities for the main responsibility for housing delivery through these reforms, especially for those authorities who lack significant public land assets, rather than landowners and developers who possess suitable land assets to be sustainably developed. Local planning authorities are responsible for permitting sustainable development (i.e. planning permissions) in appropriate locations for local community benefit but not delivery (i.e. housing completions). Except for authorities that have suitable land ownership, which, in the case of Fareham Borough Council, is negligible. Clearly, if the Government task local planning authorities with delivery, simply by reducing the length of permissions when viable and practical, is inadequate for this proposed responsibility.
45. The Council believes the Government needs to reconsider these proposals, and target reforms on those responsible at each stage of the delivery of housing. If developers fail to deliver development (i.e. housing completions) with suitable infrastructure (i.e. in line with local community & Council aspirations), there is no recourse. For Council's like Fareham, to allocate less sustainable locations or more development, would result in much unnecessary anxiety from local communities and less sustainable development, which will have adverse effects on existing and future generations, which in turn undermines sustainable development.
46. Furthermore, in a small highly urbanised Borough, sandwiched between two major cities (Portsmouth and Southampton), where there are limited options for sustainable development, simply changing allocations that do not deliver as site promoters' or applicants have stated, is not a satisfactory approach. It is not one which is not plan-led or one which engages with local communities. It also causes local communities significant concern when there is uncertainty over delivery.
47. If, despite the Council's opposition, the Government does force through these proposals and impose these burdens on local planning authorities, it would need to give Councils suitable delivery mechanisms in the most sustainable locations. For example, the ability to new fast-track Compulsory Purchase Order (CPO) powers to acquire land allocated for sustainable development (i.e. edge of settlements where brown-field sites are fully exploited) at 'Existing Use Value' and appropriate compensation for disruption and relocation to those landowners and tenants affected in order that these sites are delivered. However, without appropriate mechanisms, CPOs remains an unsuitable, costly and lengthy method for Councils. The Council await the outcomes of Sir Oliver Letwin's review on these fundamental matters.

Council Opposition to the removal of the reference to 'Garden City Principles' within the NPPF

48. The removal of the Garden City principles (paragraph 52 of the existing NPPF) from the draft revised NPPF appears to question the Government's support for new 'Locally-Led Garden Villages, Towns and Cities' that was only announced in March 2016. Fareham Borough Council has spent a considerable number of years investing in the planning of a new 6,000 home Garden Village community at Welborne. This has included the development and adoption of the Welborne Plan in 2015, which embraces 21st Century Garden City principles and sets out how the Council wants the new community to be developed. This further culminated in the award of Garden village status from Government in January 2017.
49. The Welborne Plan seeks to take as a starting point, the original guiding principles of the Garden City movement and update them to make them relevant to the 21st century. The long-established Garden City (Village) principles which will help guide the development of Welborne include the long-term stewardship of community assets, high quality imaginative design including homes with gardens, mixed tenure homes which are affordable for ordinary people, a strong local job offer with a variety of employment opportunities, easy access to generous green spaces linked to the wider countryside, local cultural, recreational and shopping facilities, and integrated and accessible transport systems.
50. The role of the NPPF should not only be to provide the specific guidance required when plan-making and determining applications, but also to provide an overarching vision for place-making and delivery standards when providing new housing. The deletion of the Garden City principles removes this vision, and does not replace it with an alternative. The proposed removal comprises part of the unequal balance that the revisions propose of speed and quantum of housing over quality. Furthermore, it comes at a stage where the Council is in the process of determining the Outline Planning Application for Welborne, and the suggested changes are likely to cause unnecessary confusion to both decision makers and the site promoter, and therefore having the undesired effect of impacting on development timeframes.
51. This Council remains completely committed to both the delivery of Welborne, which forms the central pillar of the Borough's housing supply over the next 25 years, and for the delivery of a high quality, inclusive and affordable new development to meet local housing need and urges the Government to retain a reference to Garden City principles within the new NPPF.

Other Comments

52. Chapter 2 makes specific reference to 'identifying and coordinating the provision of infrastructure' in paragraph 8.a). District/Borough Councils have, such as Fareham Borough Council, limited powers to co-ordinate

delivery of certain types of infrastructure, nor are responsible for provision of certain types of infrastructure. Case in point, transport, education and health infrastructure. Responsibility for such infrastructure provision to meet the needs of increasing levels of housing delivery lies with the County Council, Utility Companies and Clinical Commissioning Groups (CCGs) in the main. Furthermore, a more specific concern is the provision of private GP surgeries to meet increasing levels of housing delivery, yet again local planning authorities lack any mechanisms to deliver this infrastructure despite local community concerns and needs.

53. Given paragraph 20 e) of the proposed changes, which require strategic plans to contain policies necessary to provide 'community facilities (such as health, education and cultural infrastructure)', it is vital that education and health authorities are required to be engaged in local planning. They should be clear in their infrastructure requirements (including timing) and also be signatories in plan making and Statements of Common Ground (SOCG), if proposals are enacted. This also applies to any party who is responsible for development and infrastructure delivery.
54. Paragraph 35 uses the term 'significant adverse impacts' in relation to sustainability appraisals. This needs clarity in its definition as it would help Councils require more specific mitigation measures where necessary for local-plan making, but also to ensure clarity in decision-making on planning applications. Government clarity will be a considerable help to Councils, applicants and affected local communities alike.

Chapter 4. Decision-making

Q7. The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

55. Fareham Borough Council generally supports these proposals.

Q8. Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

56. It is suggested that local plan policies and supplementary planning documents remain the best place for such circumstances to be set out.

Q9. What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

57. If such review mechanisms were mandatory developers would benefit from having a more familiar and consistent approach across local authority areas to this issue.

Chapter 5. Delivering a wide choice of high quality homes

Q11. What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

58. This very much depends on the geography of the authority and nature of deliverable or developable sites. The 'call for sites' exercise in itself limits choice on developable land available, relying on whether a landowner is interested in proposing development on their land-holdings.
59. Currently Councils cannot force site promoters/developers to work together or sub-divide land. Therefore, it is highly recommended that Government are not prescriptive on the matter of the proportion of land coming forward on small or medium sites.
60. As detailed in the answer to Question 5, as explained in paragraphs 45 to 49. These are replicated below in answer to Question 11.
61. The Council questions the focused and continued emphasis on local planning authorities for the main responsibility for housing delivery through these reforms, especially for those authorities who lack significant public land assets, rather than landowners and developers who possess suitable land assets to be sustainably developed. Local planning authorities are responsible for permitting sustainable development (i.e. planning permissions) in appropriate locations for local community benefit but not delivery (i.e. housing completions). Except for authorities that have suitable land ownership, which, in the case of Fareham Borough Council, is negligible. Clearly, if the Government task local planning authorities with delivery, simply by reducing the length of permissions when viable and practical, is inadequate for this proposed responsibility.
62. The Council believes the Government needs to reconsider these proposals, and target reforms on those responsible at each stage of the delivery of housing. If developers fail to deliver development (i.e. housing completions) with suitable infrastructure (i.e. in line with local community & Council aspirations), there is no recourse. For Council's like Fareham, to allocate less sustainable locations or more development, would result in much unnecessary anxiety from local communities and less sustainable development, which will have adverse effects on existing and future generations, which in turn undermines sustainable development.
63. Furthermore, in a small highly urbanised Borough, sandwiched between two major cities (Portsmouth and Southampton), where there are limited options for sustainable development, simply changing allocations that do not deliver as site promoters' or applicants have stated, is not a satisfactory approach. It is not one which is not plan-led or one which engages with local communities. It also causes local communities significant concern when there is uncertainty over delivery.

64. If, despite the Council's opposition, the Government does force through these proposals and impose these burdens on local planning authorities, it would need to give Councils suitable delivery mechanisms in the most sustainable locations. For example, the ability to new fast-track Compulsory Purchase Order (CPO) powers to acquire land allocated for sustainable development (i.e. edge of settlements where brown-field sites are fully exploited) at 'Existing Use Value' and appropriate compensation for disruption and relocation to those landowners and tenants affected in order that these sites are delivered. However, without appropriate mechanisms, CPOs remains an unsuitable, costly and lengthy method for Councils. The Council await the outcomes of Sir Oliver Letwin's review on these fundamental matters.

Q12. Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

65. No, the Council would like to reiterate its comments, as detailed in the Council's earlier response, in paragraphs 9 to 52. The Council objects to these Government proposals within Chapter 5.

Q14. Do you have any other comments on the text of Chapter 5?

66. The Council would like to reiterate its comments, as detailed in the Council's earlier response, in paragraphs 9 to 52. The Council objects to these Government proposals within Chapter 5.

Other Comments

67. The Council requests clarification from the Government on what exactly an 'area-wide design assessment' is, in order to aid local authorities in plan-making, as mentioned on page 18.

Chapter 6. Building a strong, competitive economy

Q15. Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

68. The Council has no comment on this specific question, as the Borough is not classified as a rural area and therefore this question is not relevant.

Q16. Do you have any other comments on the text of Chapter 6?

69. The Council requests that the Government clarify who is responsible for producing local industrial strategies.
70. The Council have a fundamental issue with Chapter 6, no thought or consideration has been given to the relationship between the proposed standard approach to housing need and employment need. In particular ensuring sustainable development, so housing can be cited where

possible close to employment opportunities. This is a fundamental flaw in the Government proposals.

71. There is no confirmation, given the above, that should Authority A take neighbouring Authority B's unmet housing need, that Authority A would need to take the associated and proportionate employment need.
72. Furthermore, it goes without saying, if this logic is followed, those authorities who take on unmet need from other neighbouring authorities should benefit from significantly higher Government funding available for associated infrastructure.

Chapter 7. Ensuring the vitality of town centres

Q18. Do you have any other comments on the text of Chapter 7?

73. With such a changeable retail and leisure market in most authorities it is important that retail need is regularly reviewed. There also should be more flexibility in the guidance and leniencies exhibited from Inspectors, when examining Local Plans, in relation to medium to long-term policy provisions in retail floor-space – especially given the likely need for the early review of such issues.

Chapter 8. Promoting healthy and safe communities

Q20. Do you have any other comments on the text of Chapter 8?

74. Whilst the Council support measures to secure healthy and safe communities, it often lacks the means to achieve these for local communities, therefore the Council would like to reiterate its previous comments, as detailed in its earlier response to Question 5, in paragraphs 53 to 55. The Council objects to these Government proposals.

Chapter 9. Promoting sustainable transport

Q21. Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

75. The Council request that the following sentence in paragraph 109 requires more Government definition - 'Development should only be prevented or refused on highway grounds if the residual cumulative impacts on the road network or road safety would be severe.'
76. In particular, the term 'severe', needs further clarity to help highway authorities and Councils to require more specific mitigation measures where necessary for local-plan making, but also to ensure clarity in decision-making on planning applications. Government clarity will be a considerable help to Councils, applicants and affected local communities alike.

Q22. Do you agree with the policy change that recognises the importance of general aviation facilities?

77. Fareham Borough Council generally supports the need to recognise the importance of general aviation facilities. The Council itself is a landowner of a aviation facility at Daedalus, and has since becoming landowner both invested and attracted employment, training and investment into the aviation facilities.

Q23. Do you have any other comments on the text of Chapter 9?

78. The Council support the Government proposed policy that applications for development should 'be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations'. However, given issues with air pollution, the Council call for a further strengthening of this wording to 'must' rather than 'should', supported with more detailed technical national requirements.

Chapter 10. Supporting high quality communications

Q24. Do you have any other comments on the text of Chapter 10?

79. The Council support the Government proposed policy that planning 'policies and decisions should support the expansion of the electronic communications network'. However, given issues with variation of the quality of communications throughout England, the Council call for technical national requirements to ensure these are appropriately delivered.

Chapter 11. Making effective use of land

Q25. Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

80. It is Fareham Borough Council's view that amended policy on making it easier to convert land, should qualify such relaxations by making it clear that the relative sustainability and accessibility of a location must be taken into account, as well as the ability for such developments to provide safe and healthy living conditions for future occupiers.
81. The phrase 'under-utilised' land should in the Council's opinion be clearly defined in the revised Framework's Glossary.

Q26. Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

82. Fareham Borough Council supports the proposed approach with regards to minimum density standards in town centre sites which are close to public transport (such as on redundant railway infrastructure close to stations) and in sustainable city locations that can access good levels of

public transport provision. However, given the Council's comments on Q25, there must be an ability to flexibly consider lower minimum densities in other parts of the plan area that are less sustainable.

Q27. Do you have any other comments on the text of Chapter 11?

83. With regards to Paragraph 117, when promoting the effective use of land, the Council welcomes the reference to "ensuring safe and healthy living conditions". Similarly, it acknowledges the flexible approach in applying policies or guidance related to daylight and sunlight suggested at Paragraph 123c "so long as the resulting scheme would provide acceptable living standards". Furthermore, the Council strongly argues that the Government should have national space requirements to ensure all occupants of new housing have suitable space provision.
84. Paragraph 122d refers to supporting development that makes efficient use of land taking into account "the desirability of maintaining an areas' prevailing character". The Council considers that this policy should be reworded to make it clear that the expectation is that development must maintain an area's prevailing character.

Chapter 12. Achieving well-designed places

Q29. Do you have any other comments on the text of Chapter 12?

85. Given the emphasis on increasing density given in Chapter 11 the Council believes it is important to also emphasise through the advice provided in Chapter 12 the requirement for design to remain of a high quality in such circumstances.

Chapter 15. Conserving and enhancing the natural environment

Q34. Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

86. Yes.

Transitional arrangements and consequential changes

Q40. Do you agree with the proposed transitional arrangements?

87. The Council would like to reiterate its comments, as detailed in the Council's earlier response, in paragraphs 9 to 52. The Council objects to these Government proposals within this section especially given the immediate nature of the proposals leading to unrealistic housing targets using the new proposed standard approach.

Q41. Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the

Framework set out in this document? If so, what changes should be made?

88. As previously mentioned in response to Question 1, Paragraph 5 of the consultation document 'National Planning Policy Framework: Consultation proposals', states that the 'Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste.' From a technical point of view, it would be extremely helpful if the planning policy documents for traveller sites and for waste are fully integrated into the Framework and associated planning policy guidance for simplicity and clarity, which is clearly the intent of the reforms.

Q42. Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in this document? If so, what changes should be made?

89. As previously mentioned in response to Question 1, Paragraph 5 of the consultation document 'National Planning Policy Framework: Consultation proposals', states that the 'Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste.' From a technical point of view, it would be extremely helpful if the planning policy documents for traveller sites and for waste are fully integrated into the Framework and associated planning policy guidance for simplicity and clarity, which is clearly the intent of the reforms.

Glossary

Q43. Do you have any other comments on the glossary?

90. As detailed previously in paragraph 113, the Council believes that the term 'entry level exceptions sites' as defined by the Government in the glossary and paragraph 72, lacks clear and detailed definition, and therefore need to be clarified by Government.