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Head of Planning Policy,  
Gosport Borough Council,  
Town Hall,  
High Street,  
Gosport.  
PO12 1EB

**BY EMAIL AND POST**

24118/A3/MK/slh

2<sup>nd</sup> July 2015

Dear Sir,

**GOSPORT LOCAL PLAN 2011-2029 MAIN MODIFICATIONS CONSULTATION –  
REPRESENTATIONS SUBMITTED ON BEHALF OF ABBEY DEVELOPMENTS LIMITED**

The following representations are submitted on behalf of Abbey Developments Limited in response to the Main Modifications which have been published by the Council (GBC) for public consultation. This follows the Examination hearings held in March 2015 in which we participated on behalf of our client.

In general, our client would wish to have received more analysis in the Inspector's preliminary findings, which does not go beyond identifying only a very limited number of proposed Main Modifications. As set below, we do not consider the approach taken to resolve the fundamental failure of this plan to make adequate provision for housing development, which is contrary to the requirements of the National Planning Policy Framework (NPPF), to be a sound approach. We explain this position below.

The following responds to 'MM2' as set out in the Main Modifications

There is a clear and alarming inconsistency in the approach proposed in MM2 towards the inadequate level of housing provision proposed in the draft Gosport Local Plan 2011-2029 when compared to the approach rejected by the Eastleigh Local Plan Inspector in February 2015.

Both GBC and the Inspector will be familiar with the Eastleigh Local Plan Inspector's report (a copy of which is attached) and the conclusions he reached in this matter, as set out in his report. In particular, he states at paragraph 16:



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**“... I consider that for the short/medium term at least, this Local Plan should seek to meet the expectations of the Framework and any significant shortcomings should be addressed now and not be postponed to the review. A planned review cannot make an unsound plan sound.”**  
(our emphasis)

The circumstances in the case of the Eastleigh Local Plan Examination mirror those in the case of the Examination of this Local Plan for Gosport. In this case, GBC is similarly proposing to plan for a level of housing significantly below that identified in the joint objective assessment of housing need for the area, namely the PUSH SHMA (January 2014). Without taking into account any other considerations, the Local Plan does not satisfy the requirements of the NPPF, in terms of planning to meet the full objectively assessed housing needs of the area. This represents a fundamental soundness failure which should weigh heavily in assessing the plan, consistent with the approach taken by the Eastleigh Inspector.

GBC is unable to claim that it was unaware of what its full objectively assessed need (FOAN) for housing is; the PUSH SHMA was published in January 2014 in advance of the pre-submission consultation published in July 2014. Furthermore, GBC's rationale to proceed to submitting the Local Plan is questionable, given that it should have taken account of events unfolding through the Eastleigh Local Plan Examination at the time. GBC had the opportunity to proceed with a soundly based plan; instead it very deliberately chose not to.

In terms of the effect of inadequate housing provision being made, the social and economic consequences of this approach were debated through the Examination hearings in March 2015 and there has been no substantive response provided by GBC to those matters. The adverse impacts of not making adequate provision for housing will be significant and insufficient justification has been given by GBC to justify this approach in terms of any constraining factors to prevent the FOAN for housing being met. This is an unsustainable approach, inconsistent with the aim and objectives of the planning system as set out in the NPPF.

No evidence has been presented by GBC which indicates that it has sought to ensure that the unmet housing need arising from its strategy will be met by the other PUSH authorities. Indeed, in the very recent case of Eastleigh, that Local Plan Inspector in his report indicates that no such request had been made (see paragraph 18). The matter is deferred pending a review of this plan and its resolution will rely upon a difficult process for such an exporting of housing need to be accepted. This, alongside other factors relating to the process for undertaking a Local Plan review, could prolong the timescales for the “short term review” being completed. Very limited weight should be attributed to Local Development Scheme put forward by GBC aimed to reassure us that a review will be completed in the timescales proposed. Again, our experience strongly indicates that a planned short term review is undeliverable (see, for example, West Berkshire and Milton Keynes Core Strategies).

In conclusion, the approach set out in MM2 is unsound. The Inspector's preliminary findings do not provide any explanation or analysis which justifies the proposed approach, particularly the seemingly inconsistency in approach when compared to that followed by the Eastleigh Inspector just 3 months prior and in very similar circumstances in all respects. For the reasons set out above, we consider MM2 to be fundamentally unsound and any merits of this Local Plan being adopted pending a planned short term review do not outweigh this significant failure and conflict with the Framework. We therefore recommend that the Inspector directs GBC to undertake further work to identify additional housing land supply if this is considered the most appropriate course of action to deal with the criticisms set out above. This should, as our previous submissions have shown, include the allocation of housing at Stokesmead.

We trust the above representations are of assistance. Please contact the writer on 0118 943 0000 or by emailing [michael.knott@bartonwillmore.co.uk](mailto:michael.knott@bartonwillmore.co.uk) should you have any questions or require any additional information.

Yours faithfully,



**MICHAEL KNOTT**  
Associate

*RP*

Enc.

cc: L. Fraquelli - Abbey Developments Ltd.