
From: Taylor, Nick [REDACTED]
Sent: 25 November 2021 18:36
To: PlanningPolicyConsultation
Subject: Local Plan 2038 Consultation Response
Attachments: GBLP_2038_Response_Form - 25.11.2021.pdf; Submission response to GBC Local Plan 2038 - 25.11.2021.pdf

Good afternoon

On behalf our client, Homes England, please find enclosed a completed form providing comments on the draft Local Plan, together with a covering letter which amplifies those comments.

We would be grateful if you could formally acknowledge receipt of this submission.

Best

Nick

Classification L2 - Business Data

Nick Taylor
Partner

<<https://www.carterjonas.co.uk/>>

T: [REDACTED]

|

M: [REDACTED]

|

carterjonas.co.uk [REDACTED]

One Chapel Place, London, W1G 0BG

<<https://www.carterjonas.co.uk/policies>>

<[REDACTED]>

[REDACTED]

[REDACTED]

🌲 Please consider the environment. Do you really need to print this email?

Classification L2 - Business Data

This e-mail does not constitute any part of an offer or contract, is confidential and intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Although the firm operates anti-virus programmes, it does not accept responsibility for any damage whatsoever that is caused by viruses being passed. Carter Jonas LLP is a Limited Liability corporate body which has "Members" and not "Partners". Any representative of Carter Jonas LLP described as "Partner" is a Member or an employee of Carter Jonas LLP and is not a "Partner" in a Partnership. The term Partner has been adopted, with effect from 01 May 2005, because it is an accepted way of referring to senior professionals. We are committed to protecting your personal information and your right to privacy, please see our Privacy Policy. <<https://www.carterjonas.co.uk/policies>>

Carter Jonas LLP

Place of Registration: England and Wales Registration Number: OC304417 Address of Registered Office: One Chapel Place, London, W1G 0BG.

Gosport Borough Local Plan 2038 Consultation Response Form

REF: _____ (for office use)

Town and Country Planning (Local Planning)
(England) Regulations 2012 - Regulation 18 Consultation



GOSPORT
Borough Council

All responses to this consultation on the draft Gosport Borough Local Plan 2038 will be taken into account and used to prepare the next stage of the Local Plan. The Local Plan, supporting documents and further information can be viewed online: www.gosport.gov.uk/GBLP2038

This form should be returned by email or post by Friday 3rd December 2021

Please email to: planningpolicyconsultation@gosport.gov.uk

or post to: Gosport Borough Council, Planning Policy, Town Hall, High Street,
Gosport, PO12 1EB

To discuss any queries please contact the Planning Policy Team:
Email: planning.policy@gosport.gov.uk Telephone: 023 9254 5461

Your details

Name:

Organisation (if any):

Address (and postcode):

Telephone:

Email:

Agent/Consultant details *(if appointed)*

Name:

Organisation (if any):

Address (and postcode):

Telephone:

Email:

Gosport Borough Council is committed to equal opportunities for all.

If you need this document in large print, on CD or tape, in Braille or in another language, please ask.

Gosport Borough Council
Planning Policy
Town Hall
High Street
Gosport
PO12 1EB

25th November 2021

Dear Sir/Madam

GOSPORT BOROUGH LOCAL PLAN 2038 CONSULTATION RESPONSE FORM

On behalf of our client, Homes England, we write to you submit representations to the Gosport Borough Local Plan 2028.

This letter introduces Homes England, as well as the context and justification for the submitted representations.

We attach to this letter the completed form which details the specific policies on which Homes England wishes to comment. In broad terms, Homes England supports the proposed allocations and policies in the draft Local Plan and its comments propose minor revisions to improve these.

INTRODUCTION

Homes England is an executive non-departmental public body, sponsored by the Department for Levelling Up, Housing and Communities ('DHLUC'). Homes England is the government's housing accelerator who has the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.

Homes England mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability alongside accelerating the delivery of key infrastructure to enable housing and employment development to be built out quickly.

POLICY D1: ADAPTATION AND MITIGATION TO CLIMATE CHANGE

Support

Homes England support the ambition and principle of this Policy and welcomes the specific reference to Daedalus as one of the key Regeneration Areas in the Borough.

In light of the challenges that the Council has faced in the delivery of new homes which is acknowledged in the most recent Housing Delivery Test ('HDT') score of 84% (January 2021), should it be feasible for appropriate sites to be developed at increased densities, the policy should provide explicit support for this. This approach would apply to all sites.

All opportunities should therefore be taken to *'make as much use as possible of previously-developed or 'brownfield' land'* (NPPF, paragraph 119). The Council acknowledges at paragraph 2.4.20 the challenges it faces in maximising housing delivery.

Homes England therefore propose a minor modification to (b) so that the policy reads:

Delivering higher densities of development **wherever possible and appropriate, particularly** on the most accessible sites (D3: Urban Regeneration Areas and H1: Sustainable Residential Neighbourhoods).

(Additions in ***bold italics and underlined***)

PARAGRAPH 2.2.10

Support

Consistent with the changes proposed to part (b) of the policy, Homes England suggest the paragraph is reworded as follows:

With the scarce land resources in the Borough, it is important to make efficient and effective use of **all** development sites to meet the significant need for new housing. Developing at higher densities in **particular** **at** accessible locations will help create sustainable communities by reducing the need for travel and making local shops and services more viable.

(Additions in ***bold italics and underlined***)

POLICY D2: DEVELOPMENT STRATEGY / TABLE 2

Support

Homes England support the principle of this Policy and specifically the reference to the contribution of new homes from within the Daedalus Regeneration Area.

Part 3

Consistent with its comments on the principle of developing at higher densities to maximise the use of brownfield land, Homes England propose that part 3 of the policy should be revised to read:

Brownfield land within the urban area of the Borough will be the priority for new development **and should be sustainably developed at the most appropriate density to maximise its development potential.** New mixed-use development will be focused within the following Regeneration Areas in line with Policy_D3: Urban Regeneration Areas:

- a) Harbour Regeneration Area
- b) Rowner and HMS Sultan Regeneration Area
- c) Daedalus Regeneration Area.

(Additions in ***bold italics and underlined***)

This change better reflects the guidance in the NPPF and will ensure the Council maximises the development yield from brownfield sites by encouraging developers. It is also consistent with the statement at paragraph 2.4.21 about the potential contributions from the Regeneration Areas.

Homes England supports the indication that 300 homes could be developed at Daedalus (Table 2). Consistent with the comments set out above, Homes England propose that this should be treated as an estimate. This change is necessary because if through the design process a higher density of development could be achieved, particularly through transitional/mixed use areas which are explained later in this submission, the indicative number of units should not be seen as an arbitrary cap.

This change is consistent with part 1a) of Policy D3 which seeks the delivery of “at least” 2,600 dwellings across the Regeneration Areas and also with Policy SS11 which refers to the development of “approximately 300 dwellings” at Daedalus. As explained below, Homes England consider the quantum of development achievable at Daedalus should be “at least” 300 dwellings across the various parcels of land within the site because the development yield will be approximately 300 under b) with additional homes potentially developed on a) and d) (see below).

POLICY D8: HEALTHY COMMUNITIES

Support

Homes England support the Council’s intention of delivering healthy communities and as a master developer, will maintain the highest design standards across Daedalus from the outset which will assist in delivering significant social, economic and environmental benefits for both the local area and new community.

POLICY D9: DESIGN

Support

Homes England support the need for good design as this is a key component of bringing forward sustainable development. As a master developer, Homes England can govern the quality from the outset, thereby ensuring, a commitment to delivering the highest quality of design across Daedalus in a comprehensive and well considered manner that can provide a development that can enhance or better reveal the significance of the heritage assets on-site and in the surrounding area.

In response to 2e), to ensure the Policy is consistent with the Environment Bill, reference to providing “at least a 10% biodiversity net gain” should be inserted. We therefore suggest 2e) is reworded as follows

e) Nature: ~~supporting~~ ***conserving*** and enhancing biodiversity ***(through securing at least a 10% biodiversity net gain)***, green infrastructure and the Borough’s distinctive landscapes.

(Additions in ***bold italics underlined and deletions***)

PARAGRAPH 2.10.20

Support

Whilst Homes England support the principles of this paragraph, to ensure consistency with the Environment Bill, “at least a 10% biodiversity net gain” should be inserted. We therefore suggest the paragraph is reworded as follows:

As part of the Environment Bill all developments will be expected to provide ***at least a 10%*** biodiversity net gain, which can be delivered through a variety of approaches (see Policy LE8). The National Design Guide and Design SPD provide further advice on how developments can successfully deliver on this requirement.

(Additions in ***bold italics and underlined***)

POLICY SS11: DAEDALUS

Support

Homes England support the principles and overarching aims of the site-specific policy.

It has identified several ways in which the policy could be strengthened to ensure Daedalus is best placed to assist the Council in delivering new homes and employment opportunities.

Part 1(a-d)

Whilst the different uses and amounts of development is supported and will build on the success of the Solent Enterprise Zone, as drafted, there is limited flexibility within the proposed allocation. Although there is currently demand for employment within the Daedalus Regeneration Area (the ‘Area’), interest/take up may reduce/slow over the period of the Plan. It is therefore suggested that for the Plan to be able to respond to changing market

trends/market activity and to provide flexibility, other uses should be identified within the wording of the allocation.

There is also an error with only three sites being referenced in the Policy and this should be four (A, B, C and D).

We therefore suggest part 1 of the Policy is reworded as follows:

1. The Daedalus Regeneration Area (DRA) is the main focus for urban renewal, employment growth and housing in Lee-on-the-Solent during the plan period to 2038. All regeneration proposals should protect and enhance Daedalus heritage assets and waterfront townscape. The following development is allocated at the DRA within the ~~three~~ **four** sites identified below:

a) A heritage-led mixed-use scheme at Seaplane Square including a renewed Hovercraft Museum with new commercial and community uses **and possibly residential on the northern boundary** (Site A);

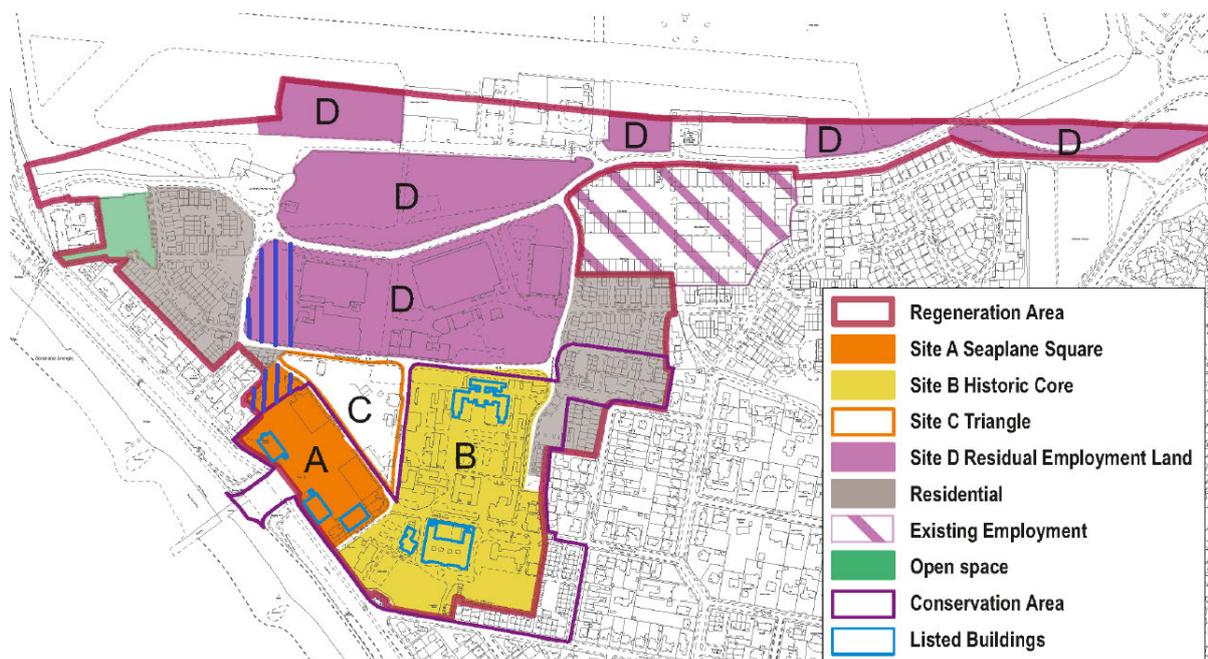
b) A heritage-led mixed-use scheme comprising commercial, community uses and approximately 300 Class C3 and/or C2 residential dwellings (Site B);

c) Employment and/or residential-led mixed-use at the triangular shaped site bounded by Hermes Road, Unicorn Road and Implacable Road (Site C); and

d) Approximately 35,000 sq. m. (gross) employment floorspace, **commercial, community uses and possibly residential on the western boundary** (Site D).

(Additions in ***bold italics underlined***)

Given the nature of employment uses in Site A and part of Site D (the main rectangular parcel edged by Implacable Road, Archer Road and Daedalus Drive), those parts of the site which are hatched blue below, should be designated as 'transition areas' within which mixed-use, possibly including residential, would be an appropriate transformation between the new housing along Implacable Road, Archer Road and Daedalus Drive and the larger employment uses in Site D.



It is therefore suggested that additional wording is added that will form 1e) which states:

1e) Within the identified transition areas, residential development may be permitted subject to proposals for the remainder of each Site and the relationship to neighbouring existing residential.

(Additions in ***bold italics underlined***)

Part 3

Homes England support the need for Daedalus to come forward in a comprehensive manner as this will ensure the residential and employment elements are delivered together addressing the land use priorities of the allocation.

A comprehensive development will also assist in ensuring the design and relationship between the different areas will respond positively to each other and deliver a holistic development that is able to foster significant social, economic and environmental benefits.

Part 4

Part 4 is intrinsically linked to Part 3 and this is vital in supporting a well-considered, comprehensive and sustainable development.

In consideration of the 'transition areas' we suggest a paragraph should be added after 3.13.28 which states:

3.13.29 (new paragraph number)

Residential development could be supported in the designated transition areas subject to the proposals for the remainder of each Site and the relationship to neighbouring existing residential.

(Additions in ***bold italics underlined***)

PARAGRAPH 3.13.45

Support

Homes England support the requirement of the Daedalus Regeneration Area being brought forward comprehensively.

PLAN 18

Support

Please see comments in response to Policy SS11 (a-d).

TABLE 3

Support

Whilst Homes England support the density range for Regeneration Areas, should there be opportunities to maximise brownfield sites by increasing densities on appropriate sustainable sites such as the Daedalus Regeneration Area, this approach should be supported by the Council because it is consistent with national policy.

I would be grateful if you could acknowledge receipt of these representations and if you have any queries, please contact me or my colleague Nick Taylor [REDACTED].

Yours faithfully

[REDACTED]

Kieron Gregson MRTPI
Associate Partner

E: [REDACTED]

M: [REDACTED]

Your representation

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: _____	Support/Object (please tick):	<input type="checkbox"/> Support	<input type="checkbox"/> Object
Please summarise why:			

Paragraph/Policy Number: _____	Support/Object (please tick):	<input type="checkbox"/> Support	<input type="checkbox"/> Object
Please summarise why:			

Paragraph/Policy Number: _____	Support/Object (please tick):	<input type="checkbox"/> Support	<input type="checkbox"/> Object
Please summarise why:			

**Paragraph/Policy
Number:** _____

**Support/Object
(please tick):**

Support

Object

Please summarise why:

**Paragraph/Policy
Number:** _____

**Support/Object
(please tick):**

Support

Object

Please summarise why:

**Paragraph/Policy
Number:** _____

**Support/Object
(please tick):**

Support

Object

Please summarise why:

Paragraph/Policy Number: _____	Support/Object (please tick):	<input type="checkbox"/> Support	<input type="checkbox"/> Object
Please summarise why: 			

Paragraph/Policy Number: _____	Support/Object (please tick):	<input type="checkbox"/> Support	<input type="checkbox"/> Object
Please summarise why: 			

If you need more space for comments please use another form or separate paper. Remember to include your name on any forms you use so we can consider your comments.

How will we use your personal information?

By completing this form you give your consent that your details will be retained to notify you of information relating to the production of the Gosport Borough Local Plan 2038.

Please note the completed form is a public document. All completed forms will be made public on our website including the names of the individual/organisation who submitted them (all other personal information will remain confidential).

Your information will be held securely for the purposes of the database and will not be shared with any other parties without first obtaining your consent. Records are kept for the lifetime of the Gosport Borough Local Plan 2038 in line with the Council's retention policy and we will not keep your information longer than necessary.

Please note you have the right to withdraw your consent to your details being held on the database at any time. Please notify us by emailing planning.policy@gosport.gov.uk or telephoning 023 9254 5461. Further details on the Council's Privacy Statement can be found online: www.gosport.gov.uk/dataprotectionprivacynotice

Optional monitoring questions

Gosport Borough Council is committed to promoting equality of opportunity and respect for diversity in the services we provide. The following questions are to help us understand how the Local Plan consultation would impact different groups of people. It is not compulsory to answer the questions, but voluntarily providing this information will help us to monitor how effectively we are talking to a range of people right across the communities we serve.

Note: If you are answering on behalf of a community group or organisation, then you don't need to complete this section.

All information is held in accordance with the General Data Protection Regulation.

1. Are you...? Please select one option

- Male
- Female
- Other _____
- Prefer not to say

2. Is your gender identity the same as you were assigned at birth? Please select one option

- Yes
- No
- Prefer not to say

3. What is your age? Please select one

- Below 16
- 16 - 24
- 25 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 - 74
- 75 - 84
- 85 or over
- Prefer not to say

4. How would you describe yourself?

Please select one option

- Heterosexual or straight
- Bisexual
- Lesbian woman
- Gay Man
- Other _____
- Prefer not to say

5. Do you consider yourself to have a disability, or a long-term illness, physical or mental health condition? Please select one option

- Yes
- No (go to question 7)

6. What is the nature of your disability, long-term limiting condition or health problem? Please select all that apply

- Physical disability
- Hearing disability
- Learning disability
- Visual disability
- Mental ill health
- Other (please state)

 Prefer not to say

7. Which group do you most identify with?

Please select one option

- No religion
- Christian
- Muslim
- Jewish
- Sikh
- Buddhist
- Hindu
- Other religion _____
- Prefer not to say

8. Are you pregnant?

- Yes
- No
- Prefer not to say

9. Have you had a child in the last 12 months?

- Yes
- No
- Prefer not to say

10. To which of these groups do you consider you belong?

- Single
- Separated
- Married
- Divorced
- Widowed
- Co-habiting
- Same sex civil partnership
- Prefer not to say

11. To which of these groups do you consider you belong? Please select one option

White

- English/ Welsh/ Scottish/ Northern Irish/ British
 - Irish
 - Gypsy or Irish Traveller
 - Eastern European
 - Other White background (please describe)
-

Black / African / Caribbean / Black British

- African
 - Caribbean
 - Any other Black / African / Caribbean background (please describe)
-

Asian / Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background (please describe) _____

Mixed / multiple ethnic group

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed / multiple ethnic background (please describe)

Other ethnic group

- Arab
 - Any other ethnic group (please describe)
-

- Prefer not to say

12. Do you have a connection to the Armed Forces?

- Yes
- No

13. If you do have a connection to the Armed Forces, please choose which option best described that connection.

- serving member of the armed forces
 - family member of someone currently serving
 - veteran
 - family member of a veteran
 - other (please describe)
-

- Prefer not to say