

Introduction:

This note is in response to the Council's Actions arising from the Hearing Sessions relating to Issue 10 in document DCD-27: Delivery and Monitoring (Chapter 8).

It is on behalf of Sustainable Land PLC and the Hammond Family who have interests in land east of Newgate Lane and north of Gosport Road, Fareham. The potential for sustainable residential development in this area has been promoted through successive stages of Fareham Borough Council's Core Strategy and Development Sites and Policies Plan. The case for residential development east of Newgate Lane has been reinforced by Hampshire Council's confirmation of their preferred route for the re-alignment of Newgate Lane, which will fragment agricultural land holdings, and by further evidence of future housing requirements in the South Hampshire Strategic Housing Market Assessment (SHMA) of January 2014.

There are related statements on Issue 2 (The Existing Settlements, DSP2-DSP6), Issue 7 (Housing Allocations, DCD-24) and Issue 9 (Facilities and Infrastructure, DCD-26).

Our comments on Issue 10 relate to concerns that we expressed in the hearings: that the Council's monitoring framework appears to focus entirely on performance and output indicators that are related to development plan policies. This approach may show whether the policies are being implemented, but it will not show whether the policies are right: i.e. whether they are having desirable or undesirable consequences. Monitoring of context and outcomes is required as well as monitoring of policy-based performance indicators.

This concern is exemplified in relation to housing where it is particularly important to monitor demand and requirements as well as supply. National Planning Practice Guidance provides relevant guidance in sections on the assessment of housing and economic development needs. These assessments need to be kept up to date by regular monitoring of market signals as well as periodic reviews of forecasts.

In particular, the following market signals should be monitored to assess the impacts of planning policies on the housing market, access to housing and the affordability of housing: land prices, house prices, rents, affordability ratios, rates of development, overcrowding, homelessness, households sharing or in temporary accommodation and concealed households.

In paragraph 1.1 of DCD-27 the Council states: *'It is the Council's view that Table 5 (Monitoring Schedule) of the submission version of LP2 (DSD01) is not sufficiently detailed in its current form. To address this the Council has reviewed the Table to add additional targets and indicators for the majority of Policies in the Plan, whilst also reviewing the mechanisms through which the monitoring information would be sourced.'*

The revised Table 5 still contains only policy-based targets and performance indicators. It contains no indicators of housing need or stress in the housing market to show whether the policies are helping to serve housing need and demand. This approach may reflect the absence of objectives in the Core Strategy relating to housing requirements, which is an even more serious criticism of the Core Strategy and Development Sites and Policies Plan. The strategic objectives of the Core Strategy relating to housing are expressed in terms of targets from the South Hampshire Strategy rather than meeting needs. However, the approach of the NPPF is that local planning authorities should seek to meet the development needs of their areas. This requires monitoring whether needs are being met and not just whether policy targets are being achieved.

In paragraph 1.3 of DCD-27, the Council states: *'The AMR includes a detailed section on suggested changes in view of Policy performance/effectiveness. It is the Council's view that this mechanism has sufficient flexibility within it to allow for the necessary adjustments to the application of policies and, if necessary, suggested changes to policies should they be found no longer deliverable or fit for purpose.'*

We have examined the 2014 AMR and find that it is also based entirely on policy-based performance indicators and outputs. There is a clear need for the Council's monitoring framework to be expanded to address the assessment and monitoring of housing need and demand and the impacts of planning policies on housing markets. This is essential information for a policy review. It is not adequate to rely on planning targets handed down from the South Hampshire Strategy, which is the current approach.