

# FAREHAM

## BOROUGH COUNCIL

Ms Helen Hockenhill  
Planning Inspectorate  
Sent via email

Head of Planning Strategy and  
Economic Development  
Gayle Wootton

**Contact:** Gayle Wootton

**Ext.:** 4328

**Date:** 3 December 2021

Dear Ms Hockenhill

### **Examination of the Fareham Local Plan 2037**

The Council was grateful to receive your initial questions and requests sent out in your letter of 17 November 2021. We are pleased to be able to respond fully and positively to the questions and have set out our answers below.

For clarity, your letter of 17<sup>th</sup> November and this response has been added to the examination website with references INSP001 (Inspector's Initial Questions Letter) and FBC001 (Council's response to Initial Questions) respectively. Any additional evidence documents have been added to the Examination Library under Post Submission Council Documents, and are referenced accordingly in this letter.

### **Legal compliance**

- 1. I note from the Council's submission letter that it is intended to review the Statement of Community Involvement in early 2022. The Planning Practice Guidance (PPG) encourages authorities to update their SCIs where they are inconsistent with the latest COVID 19 guidance. Why did the Council consider this was not necessary? What steps did the Council take to ensure that sections of the community without access to the internet could engage in the examination process?**

The Statement of Community Involvement (SCI) was adopted in March 2017. Planning Practice Guidance states that the SCI should be reviewed every 5 years from adoption date. This would require the review of Fareham's SCI to take place by March 2022. Due to the changes in legislation and housing number requirement the Council has encountered, the preparation of the Fareham Local Plan 2037 has been a longer process than predicted and to ensure consistency regarding consultation throughout each stage of the process, the Council has continued to work using the existing SCI. With submission of the Local Plan to the Planning Inspectorate taking place in September 2021, it is anticipated that the Local Plan examination will take place in the Winter/Spring of 2021/22. The Council have already confirmed its

**Planning & Regeneration**  
Civic Offices Civic Way Fareham PO16 7AZ  
Tel: 01329 236100  
Voicemail: 01329 824630 [gwootton@fareham.gov.uk](mailto:gwootton@fareham.gov.uk)  
Keep up to date with our latest news: like  Fareham on Facebook  
and follow  @FarehamBC on Twitter

intention to review the SCI at the first opportunity, once the plan has been through examination as it is considered appropriate to review the SCI at the start of a Local Plan cycle.

The SCI is considered to have been consistent with COVID 19 guidance introduced via the PPG on 13 May 2020. The wording of the PPG is as follows;

*'Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue'.* (Plan-making: Paragraph 77 Reference ID: 61-077-201200513)

The two Regulation 19 consultations were undertaken during the Coronavirus pandemic and the SCI was reviewed in advance of the decision being taken to undertake the consultation and it was decided that the SCI, as it pertains to Local Plan consultations, could be complied with wholly as it allows the Council to determine the precise mode of engagement depending upon the situation (see paragraph 5.1 of [GEN002 Fareham Statement of Community Involvement](#)).

Evidence of this consideration can be found in the Committee papers seeking Council approval for the consultation which state the following;

*'Some elements of the consultation will need to be run in a manner which acknowledges the current Coronavirus restrictions, and any restrictions which are introduced in advance of, or during the consultation. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI), which is sufficiently flexible to accommodate procedures that may be required, or not permissible, in light of Coronavirus restrictions.'*

*The consultation will be focused around the 'Have Your Say' approach used by the authority in all its public consultations. Whilst officers will endeavour to hold the well-attended and valued public CAT meetings and pop-up exhibitions, these will need to be governed by the Covid 19 restrictions at the time and so may not be able to take place. It is therefore proposed that the Council will run a virtual public exhibition throughout the consultation. This will include short films, virtual display boards and opportunities to ask questions of planning officers online. A video presentation of the Plan will illustrate some of the key aspects and explain the points on which feedback is being sought.*

*Whilst the Regulations normally require the provision of hard copies of the consultation documents in public venues, such as libraries, for the period of the consultation, the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 amend this requirement to simply require documents to be made available on the Council's website.'*

The Council ensured the consultation was undertaken in accordance with the SCI, with the following measures undertaken to publicise the consultation and ensure that consultation material was available and accessible:

- Publication of the two Regulation 19 consultation documents and supporting evidence documents on the Council's website.

- An online virtual exhibition including presentations and displays with links to the Publication Local Plan and evidence base.
- Targeted contact with consultees, including neighbouring authorities.
- Notification of the consultation to all registrants on the Council's Planning Strategy Database.
- Regular posts in respect of the consultation on the Council's Facebook and Twitter accounts.
- Press releases that were picked up by local newspapers (see pages 116 and 134 of [CD005Ap1 Appendix 1: Methods of Engagement](#)).

With specific reference to those sections of the community without access to the internet, the following measures were undertaken:

- Publication of a (hard copy) special edition of the Council's Fareham Today magazine, sent to all residential addresses across the borough (see page 110 and 126 of [CD005Ap1 Appendix 1: Methods of Engagement](#))
- Direct mailing either by email or posted letter (over 100) to parties on the Planning Strategy consultation database without an email address, or who expressed a preference for communication by letter.
- Bus stop posters across the borough.
- A1 posters on FBC poster sites in car parks. A pull-up banner in the reception of the Council's office and three A0 poster boards outside the entrance.
- Posters in 45 noticeboards across the borough.
- A dedicated telephone line (publicised in the Fareham Today magazine) where questions could be asked of a planning officer during office hours.
- Four Community Action Team meetings and five exhibitions across the borough, also publicised in the Fareham Today magazine (see page 135 of [CD005Ap1 Appendix 1: Methods of Engagement](#)) were held. Over 50 people attended the five exhibitions and over 90 people attended the four meetings.
- Booking arrangements to view the consultation documentation in the Civic Offices in a Covid secure environment. This service was requested and provided during the first Regulation 19 consultation on the 8<sup>th</sup> December 2020 for one resident, and on 26<sup>th</sup> July 2021 for two residents during the Revised Publication Local Plan Regulation 19 consultation.

Arrangements were made for representations on both Regulation 19 consultations to be submitted on-line, by email and by letter with the option of using a consultation form that could be completed via the Council's website or by using a hard copy available to download online or printed and posted out by the Planning Strategy or Communications Team upon request. The Council received 26 handwritten responses across the two Regulation 19 consultations which are included in the list of responses in policy order and alphabetical order (see examination library references CD007, CD008, CD009 and CD010) and the summary of responses contained within the Regulation 19 Summary of Responses ([CD005Ap3 Appendix 3: Regulation 19 Summary of Responses](#)).

## **2. Did the revised Regulation 19 consultation seek comments on the whole plan or just the revisions?**

Local communities, business and other interested parties were encouraged to focus their comments on the revisions that were made in the Revised Publication Local Plan within the parameters of the 'tests of soundness' and points of legal compliance, as set out in the National Planning Policy Framework (NPPF). This was clearly set

out in the Fareham Today (see page 129 [CD005Ap1 Appendix 1: Methods of Engagement](#)) and the last two paragraphs of the introduction section of the response form for the consultation (see page 148 [CD005Ap1 Appendix 1: Methods of Engagement](#)). Any policies or text which had not been amended remained as it was in the Publication Local Plan, and responders were informed that there was no need to repeat comments made on these policies, as comments made at the previous Regulation 19 consultation would be submitted in full to the Planning Inspectorate as part of the examination process. The changes were clearly highlighted within the Plan through the use of track changes as set out in paragraph 1.14.1 of the Plan but at no time were consultees dissuaded from making comments on unchanged elements of the plan.

The online survey form offered during the Revised Publication Local Plan consultation included drop down options for the new/amended elements of the Plan, but other boxes were available, and used, for commenting on all elements of the Plan.

In all, 626 comments were received on the Revised Publication Local Plan ([CD009 List of Responses in alphabetical order to Revised Publication Local Plan Parts 1 to 3](#), [CD010 List of Responses in policy order to Revised Publication Local Plan Parts 1 to 6](#)). 30% of these comments were made on parts of the Revised Publication Local Plan that had not been altered since the Publication Local Plan. Comments were received on all parts of the Plan, whether altered or not, during the Revised Publication Local Plan consultation and all comments been considered equally in terms of the preparation of the summaries in the Statement of Consultation ([CD005Ap3 Appendix 3: Regulation 19 Summary of Responses](#)) and submission to the examination.

### **3. Have any concerns been raised in relation to the Equality Impact Assessment?**

The Equalities Impact Assessment (EqIA) has been consulted upon three times as part of the Local Plan preparation process. Consultation took place during the 2017 Regulation 18 draft Plan, the 2020 Regulation 19 Publication Local Plan and the 2021 Regulation 19 Revised Publication Local Plan consultations. The EqIA was prepared in house following consultation with the Council's lead officer responsible for equalities. The Council's consultation database includes a range of groups and organisations covered by the 'general consultation bodies' as set out in Regulation 2, Part 1, Town and Country Planning (Local Planning) (England) Regulations 2012. In relation to equalities and the protected characteristics, the Council consults a number of bodies which represent the interests of specific groups or sections of the community in the borough. The full list can be found in the Regulation 22 Statement of Consultation (see page 3 [CD005Ap4 Appendix 4: Individuals and organisations invited to take part in the consultations \(Local Plan Database\)](#))

Across all three consultations, the Council only received one comment in relation to the document. This was made during the 2017 Draft Plan (Regulation 18) consultation in response to text that was removed before the EqIA was revised for the Regulation 19 consultations. The text suggested that developer contributions towards schools and childcare facilities would only be collected for schemes over 100 dwellings, but the text was consequently amended to cover all proposed allocations and windfall development proposals in line with the Hampshire County Council Children's Services guidance. Therefore, no concerns were raised on the EqIA during either Regulation 19 consultation.

## **Duty to cooperate**

4. **I am aware of the proposed review and update to the Partnership for South Hampshire (PfSH) Spatial Position Statement with a new Joint Strategy. This document will consider the predicted unmet housing need in the sub region and look at the potential for Strategic Development Opportunity Areas. Can the Council please advise me of the programme of work to be undertaken and its anticipated timeframe?**

The Council has taken a proactive role in the PfSH work to revise the Spatial Position Statement of 2016 and develop a new Joint Strategy. The programme of work has evolved since the Joint Committee agreed to begin the review in December 2018 with some workstreams, such as an Urban Capacity Assessment, no longer being taken forward. The workstreams currently being progressed to formulate the strategy are the work to identify Strategic Development Opportunity Areas, with an associated Transport Assessment, and a study into the Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt designation. The former is further progressed with consultants appointed in 2020 to undertake assessments including Sustainability Appraisal and Habitats Regulations Assessments of the potential sites and the Council has provided input and commentary throughout the process.

However, the work is still in development and as the following table (table 1) shows, as published in a report for the PfSH Joint Committee on 25 October 2021 ([FBC002 PfSH Joint Committee Report – Statement of Common Ground 2021 – Revisions and Update, October 2021](#)), the work is not currently expected to be published until autumn (Quarter 3) of 2022 (the original timetable programmed the revised strategy to be completed by July 2020). Due to the Council's desire to progress its Local Plan, not least to establish a five-year housing land supply, but also to meet with the Government's intention to have Local Plans in place by the end of December reinforced by the Ministerial Statement of 19 January 2021 recognising the importance of having Local Plans in place as a measure of economic recovery in light of the Covid-19 pandemic, the Council does not want to delay its plan to await the outcome of the PfSH work.

Table 1: PFSH SDOA Project Timetable

	Q4 2021	Q1 2022	Q2 2022	Q3 2022
<b>SDOA assessments<sup>7</sup></b>				
Identify SDOAs and scope assessments/transport commission <sup>8</sup>				
Procure consultants for SDOA assessments				
Undertake assessments	X	X	X	
Procure transport consultants				
Undertake modelling & TIAs <sup>9</sup>	X	X	X	
Finalise report			X	
Final report presented to Joint Committee				X
<b>Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation</b>				
Establish green infrastructure needs through SDOA assessments (SA/HRA)	X			
Consider options for policy approach scope and procure landscape assessment	X			
Undertake assessments and further consider options		X	X	
Review evidence and determine approach to green belt designation				X

However, recognising the importance of these role Duty to Co-operate discussions and the fact that PFSH remain supportive of authorities progressing their own Local Plans at different timescales to the development of the new Joint Strategy, the Council has secured a Statement of Common Ground with the other authorities in PFSH (an updated version of SCG005 has been signed by PFSH's Joint Committee since submission, and is in the examination library as reference [FBC003 Updated Statement of Common Ground between FBC and PFSH \(supercedes SCG005\) Oct 2021](#)). This SoCG, as SCG005 before it, recognises Fareham's contribution to unmet need as proposed in the submitted plan, and the Council's continued work in the partnership. Importantly for the consideration of the submitted plan, the Statement of Common Ground states that should the Joint Strategy work identify sites not considered suitable for development in the Fareham Local Plan technical evidence, this would be a matter for the Local Plan review, i.e. not for the plan currently under examination. The Council welcome this pragmatic view by the other authorities in the partnership and remains committed to the Joint Strategy work recognising the aspirational timescale of up to 2050.

### Habitats Regulations Assessments (HRA)

- Appendix 3 of the HRA (ISLP008) includes a Technical Note regarding the Nitrogen Budget. Section 4 discusses potential nutrient mitigation schemes. What is the current position on their availability? I note from Strategic Policy H1 that there are approximately 4184 homes on sites with resolutions to grant planning permission at 1 April 2021. These permissions have been stalled

**because of this issue. When is it anticipated that these sites will be granted consent?**

Table 1 within Appendix 3 of the HRA ([ISLP008 Habitats Regulation Assessment: Screening Report and Appropriate Assessment Report for Publication Local Plan](#)) details the total nutrient budget for the Local Plan as being 2182.62 kg/TN/year. The Council can confirm that the nutrient mitigation schemes listed within that table, namely Hampshire and Isle of Wight Wildlife Trust (Isle of Wight Schemes) and Warnford Park Estate, are still available with capacity.

However, additional mitigation schemes have become available since publication of that report, and the table below (table 2) provides an updated list of nutrient mitigation schemes and the total number of kilograms of total nitrogen per year (Kg/TN/yr) available for use by developments in Fareham.

**Table 2: Nutrient Mitigation schemes currently available for use in by development in Fareham**

<b><i>Mitigation schemes available for use by development in Fareham</i></b>	<b>Total number of Kg/TN/yr that is available from the scheme</b>
Eastleigh Borough Council Scheme (Botley)	1500kg
Hampshire and Isle of Wight Wildlife Trust (Isle of Wight Schemes)	3000kg
Warnford Park Estate	3000kg
Whitewool Stream Wetland (Meon Springs)	2000kg
Heaton Farms	486.72
<b>Total</b>	<b>9,986.72kg/TN/yr</b>

As shown in table 2, there are currently five mitigation schemes available for use to mitigate development in Fareham and the total capacity of the schemes is 9,986.72 kg/TN/yr. With the nutrient budget for the period of the Local Plan totalling 2182.62 kg/TN/yr and the current availability of mitigation, the Council is confident that there is adequate capacity to mitigate the level of development in the Local Plan.

For completeness, the decision notices giving authority from the Council's Director of Planning and Regeneration for the Council to enter into legal agreements to secure nitrate mitigation with the following schemes are listed below:

- Hampshire and Isle of Wight Wildlife Trust (Isle of Wight Schemes) ([FBC004 HIWWT Mitigation Scheme Report Decision July 2020](#) )
- Warnford Park Estate ([FBC005 Warnford Estate Mitigation Scheme Report Decision Mar 2021](#))
- Heaton Farm ([FBC006 Heaton Farms Mitigation Scheme Report Decision May 2021](#))
- Whitewool Stream Wetland (Meon Springs) ([FBC007 Whitewool Farm Mitigation Scheme Report Decision Oct 2021](#))

It has not been necessary to secure a legal agreement with the Eastleigh Borough Council scheme. This is because no developer has approached the Council stating their intention to use this scheme as their mitigation option and therefore, no decision

has been required to secure and enter a legal agreement with that particular mitigation provider.

Appendix 3 of the HRA ([ISLP008 Habitats Regulation Assessment: Screening Report and Appropriate Assessment Report for Publication Local Plan](#)) makes reference to a wetland scheme called Meon Marsh. There is currently a planning application submitted to the Council for this mitigation scheme which is still under consideration. If the application is approved, this mitigation scheme could also be used as a further option to mitigate development in Fareham.

In addition, the Partnership for South Hampshire's (PfSH) employs a Strategic Environmental Planning Officer based at this Council who has been working on securing mitigation schemes within the sub-region. This work is on-going, and it is expected that further nutrient mitigation schemes will become available in the future as a result.

With regards to the number of homes stated in Strategic Policy H1 with resolutions to grant planning permission as at 1 April 2021, the table below (table 3) sets out the changes that have occurred since that date.

**Table 3: Update position on sites with resolution to grant planning permission as at 1 April 2021.**

<b>Application with resolution to Grant at 1 April 2021</b>	<b>Status as of 03/12/2021</b>	<b>Dwelling Yield</b>
Land South West of Sovereign Crescent (P/18/0484/FP)	Permission issued 8 <sup>th</sup> July 2021	38
Land adjacent to 125 Greenaway Lane	Outline Approval issued 22 <sup>nd</sup> April 2021	100
Magistrates Court (P/18/1261/OA)	Outline Approval issued 22 <sup>nd</sup> November 2021	45
Land at 18 Titchfield Park Road (P/20/0235/OA)	Outline Approval issued 19 <sup>th</sup> July 2021	6
Moraunt Drive, Portchester (P/18/0654/FP)	Permission issued 7 <sup>th</sup> May 2021	48
Welborne (P/17/0266/OA)	Outline Approval issued 30 <sup>th</sup> September 2021	3,610
<b>Total</b>		<b>3,847</b>
Land at Brook Lane, Warsash (P/17/0845/OA)	The Council understands that the mitigation is being sought from Heaton farm but the permission has yet to be issued.	180
Land to the East of Brook Lane and West of Lockwood Road, Warsash (P/17/0998/OA)	The Council understands that the developers are proposing to bring forward a full planning application by Spring 2022 and no longer progress this outline application.	157
<b>Total</b>		<b>337</b>
<b>Grand Total</b>		<b>4,184</b>

This table shows that the significant majority of resolutions to grant as of 1<sup>st</sup> April 2021 have now been issued as planning permissions with appropriate mitigation secured for the issue of nitrate neutrality. The Council recognises that further updates may be required as part of the examination to reflect the changing position in relation to planning permissions.



6. **Recreational Impacts on the New Forest: The Statement of Common Ground (SoCG) with Natural England (SG006) discusses the need for a strategic cross boundary strategy to tackle the impact of recreational disturbance on the New Forest SAC/SPA/RAMSAR. I note that the Council has joined the project steering group to work with other affected authorities. In the meantime, until this has been agreed, Natural England suggest an interim mitigation strategy be prepared. What progress has been made with this? Has a programme of work and timetable been set out?**

The Council has published an Interim Mitigation Scheme to provide mitigation for recreational disturbance impacts generated by new residential development within the 13.8km Zone of Influence within Fareham Borough. The Interim Scheme has been produced in consultation with and approved by Natural England. The Interim Mitigation Scheme will be presented at a meeting of the Council's Executive on 7<sup>th</sup> December 2021 for approval. Subject to that decision, the Planning Committee will be advised of the mitigation approach to be considered as a material planning consideration in their determination of planning applications which will enable the Local Planning Authority to secure appropriate mitigation.

The Interim Mitigation Scheme can be submitted to the Council's examination library once approved.

### **Housing needs**

7. **Paragraph 4.2 of the plan indicates that the housing need figure using the standard methodology is 541 dwellings per annum. Please point me to where in the evidence base this calculation is set out.**

Paragraph 4.2 of the plan ([CD001 Revised Publication Local Plan](#)) confirms that the housing requirement has been calculated using the standard methodology using 2014-based household projections in combination with affordability data released in March 2021. The calculation is not set out in the evidence base as it follows the PPG exactly, however if it is helpful for the Inspector, the calculation is set out below.

Consistent with the methodology, the baseline was set using national household growth projections (2014-based household projections) for the local authority area using a base date of 2021. Using these projections, the average annual household growth over a 10-year period was calculated. The projections show an anticipated household growth from 50,729 households in 2021 to 54,584 in 2031 with an average annual growth rate of 386 homes.

The next step was to adjust the average annual projected household growth figure based on the affordability of the area in order to ensure that the local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. In accordance with the PPG the most recent median workplace-based affordability ratios, published by the Office for National Statistics, were used. The 2020 data (published in March 2021) shows a median house price of £299,950 and median workplace earnings of £28,734 giving an affordability ratio of 10.44. The adjustment to be made follows the following formula:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

Multiplying 386 by the adjustment factor of 1.4 means that the result is a housing requirement of 541 dwellings per annum.

A cap can then be applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing. In the case of Fareham, for the purposes of calculating housing need via the standard methodology, the relevant strategic policies for housing became out of date in June 2020 (as the adopted Plan was adopted in June 2015) and therefore the local housing need figure would be capped at 40% above whichever is the higher of:

- the projected household growth for the area over the 10-year period identified in step 1; or
- the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists)

The cap level was calculated accordingly. A 40% increase on the household growth projections results in a cap of 541 (386 x 1.4 = 541 (rounded up)). Alternatively, a 40% increase on the annual housing requirement figure set out in the most recently adopted strategic policies would result in a cap of 473 (337.67 x 1.4 = 473 (rounded up)). The cap is set at the higher of these two figures and therefore the cap would be 541.

The housing requirement using the standard methodology figure after applying the affordability uplift is 541 (rounded up), which is the same as the capped housing requirement and therefore the cap does not apply. Fareham's housing need is 541 dwellings per annum. This results in a Local Plan requirement of 8,656 new homes over the 16-year plan period from 2021 to 3037.

**8. The PPG sets out that a stepped trajectory may be appropriate where strategic sites may have a phased delivery or are likely to deliver later in the plan period, specifically in Fareham, the Welborne Garden Village. The supporting text in the plan provides some justification for the stepped requirement but this is limited. What further evidence can the Council provide to support this approach?**

The housing trajectory set out in Appendix B of the Local Plan sets out the anticipated delivery rates and demonstrates the Council's commitment to meeting the Borough's housing need in full by 2037 and maximising housing delivery, both in the short and long term. The delivery assumptions have been based on regular engagement with developers and site promoters, the most recent being October 2021. Hampshire County Council, who undertake housing monitoring on the Council's behalf, also provide us with phasing information based on information collected from National House Building Council (NHBC) and Building Control data and their own conversations with developers. In all cases the Council has the NPPF's definition of 'deliverable' and 'developable' in mind in terms of the evidence requirements. Due to the rigour of the data the Council has confidence that the delivery assumptions are

reasonable and realistic and the total housing requirement and stepped targets set out in Policy H1 reflect what can be delivered.

As set out in Paragraph 4.16 of the submission Local Plan ([CD001 Revised Publication Local Plan](#)) it is expected that the majority of the housing sites will start to deliver in the latter part of the five year period, including at the Welborne Garden Village which is not expected to start delivering housing until 2023/24. The Housing Delivery Action Plan June 2021 ([FBC008 Housing Delivery Test Action Plan June 2021](#)) sets out reasons why housing delivery has been particularly constrained in the past few years and this position is expected to continue in the short term. This is largely due to housing delivery in any given year being, in part, a reflection of the number of sites with planning permission. There is a lag between the granting of planning permission and the completion of new home on sites. The lag time between the granting of planning permission and commencement is dependent on the size of the site and other related matters (such as the provision of infrastructure as well as the impact of extraneous events such as the impact of COVID 19).

The issue of nutrient neutrality has had a significant impact on development in the borough and the wider Solent area following Natural England's advice to local councils reflecting European case law (in particular the Dutch case). The advice requires that every application for development which would result in a net increase in overnight accommodation must demonstrate that the proposals maintain or reduce the levels of nitrates leaving their site or provide mitigation. As a direct result of the advice from Natural England and the lack of available mitigation measures at that time (now largely resolved, see the answer to question 5), a significant backlog of outstanding planning applications built up for housing proposals within Fareham Borough since February 2019 have now been determined. The number of homes granted planning permission in the borough has previously been around the 300-home mark, but in the reporting year 2019/20, just 73 net new homes were permitted. and it was the issue of nitrate neutrality and the lack of mitigation that was the only reason why more permissions could not be granted. At the highest point in 2020, there were applications amounting to 1,400 homes which could not be progressed until a nitrate solution could be found. The Council has worked hard to find a resolution to this issue. Solutions have now been identified and implementation has begun to mitigate the impact of nutrient neutrality in the Solent, allowing a backlog of permissions to be consented since July 2020 (see the answer to question 5).

In relation to sites which may deliver later in the plan period the broad location of development in Fareham town centre (Policy BL1 in the submitted Plan ([CD001 Revised Publication Local Plan](#))), is specifically identified for delivery in years 10 to 16 of the plan period. The NPPF is clear that Local Plans can identify 'broad locations for growth' as opposed to specific sites for the periods later in the plan period. The Council is aware that evidence is required that the broad location is 'developable' which the NPPF defines as having a reasonable prospect that the site will be available and could be viably developed within the plan period, which the initial technical work undertaken to date demonstrates. Policy BL1 refers to the production of a Supplementary Planning Document (SPD) which although underway, and will build on the existing Town Centre Vision, will require detailed discussions with multiple stakeholders (although the Council own most of the freehold), clarity over phases of delivery, and periods of public consultation on the detail of the masterplan. Therefore, the timescale is appropriate when considering the work required to develop and deliver the SPD.

Welborne Garden Village is programmed to start delivering in the near term throughout the plan period. Despite significant effort by the Council and developer Buckland Developments Ltd, it has taken longer than envisaged to secure the complex funding strategy for J10 improvements on the M27 motorway as part of the Welborne Garden Village proposals. That strategy is now agreed based on both developer contributions and central Government funding, however the delay in securing all aspects of the agreement has caused delivery at Welborne Garden Village to be later than originally anticipated. The trajectory for Welborne that has informed the delivery assumptions in the plan from April 2021, is one that the Council can be confident in now that the planning permission has been issued and the funding for J10 is established (see the answer to question 13).

In relation to the setting of a stepped requirement, the PPG states (Housing Supply and Delivery: Paragraph: 021 Reference ID: 68-021-20190722): *“A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”* For the reasons set out above, the Council believes that a stepped requirement is justified for Fareham.

Whilst the housing trajectory set out in Appendix 1 of this letter shows that delivery rates are expected to step up from 2023/24, the NPPF requires planning policies to identify a supply of specific, deliverable sites for years one to five of the plan period with the appropriate buffer. Taking into account the requirement for a 20% buffer (as determined by the 2020 HDT results) on five-year housing land supply, the specific figures of the stepped housing requirement proposed in Policy H1 are necessary in order to achieve a five-year housing land supply on adoption of the Local Plan that is realistic and can be sustained over the Local Plan period. Table 4 below summarises the rolling five-year housing land supply position for the first five years of the plan period, factoring in the stepped housing delivery target periods. This analysis clearly demonstrates that, based on the minimum site capacity requirements, a five-year housing land supply can be secured upon adoption of the plan and maintained.

**Table 4: Five Year Housing Land Supply**

	2021/22 – 2025/26	2022/23 – 2026/27	2023/24 – 2027/28	2024/25 – 2028/29	2025/26 – 2029/30
Local Plan Housing Requirement	1,990	2,235	2,480	2,900	3,075
5 Year Requirement (inc. buffer)*	2,388	2,682	2,976	3,045	3,229
Housing Supply	2,883	3,488	3,682	3,506	3,414

Supply vs requirement	+495	+806	+706	+461	+185
5 Year Housing Land Supply	6.04	6.50	6.19	5.76	5.29

\* 20% buffer applied for first three years due to expected HDT results with 5% buffer applied from then on.

The other consideration in setting the stepped housing targets is the ability to meet the requirements of the Government's Housing Delivery Test. The Council would prefer to avoid having to apply a 20% buffer to the five-year land supply as a result of the HDT test, but the projections show that there is little the Council can do to avoid that penalty over the next three years of HDT results (including those for the 2021 HDT). The proposed first step of 300 homes per year is set at a point where we calculate future HDT results would be over 85% as soon as realistically possible.

In summary, the total requirement and the stepped requirements reflect what can be delivered as evidenced in the SHELAA ([DS004 Strategic Housing and Employment Land Availability Assessment](#)) and based on regular engagement with relevant parties. The Council considers that in order for the Local Plan to effectively deliver the plan-led system, the stepped approach to annual average housing requirements is justified for the reasons explained above.

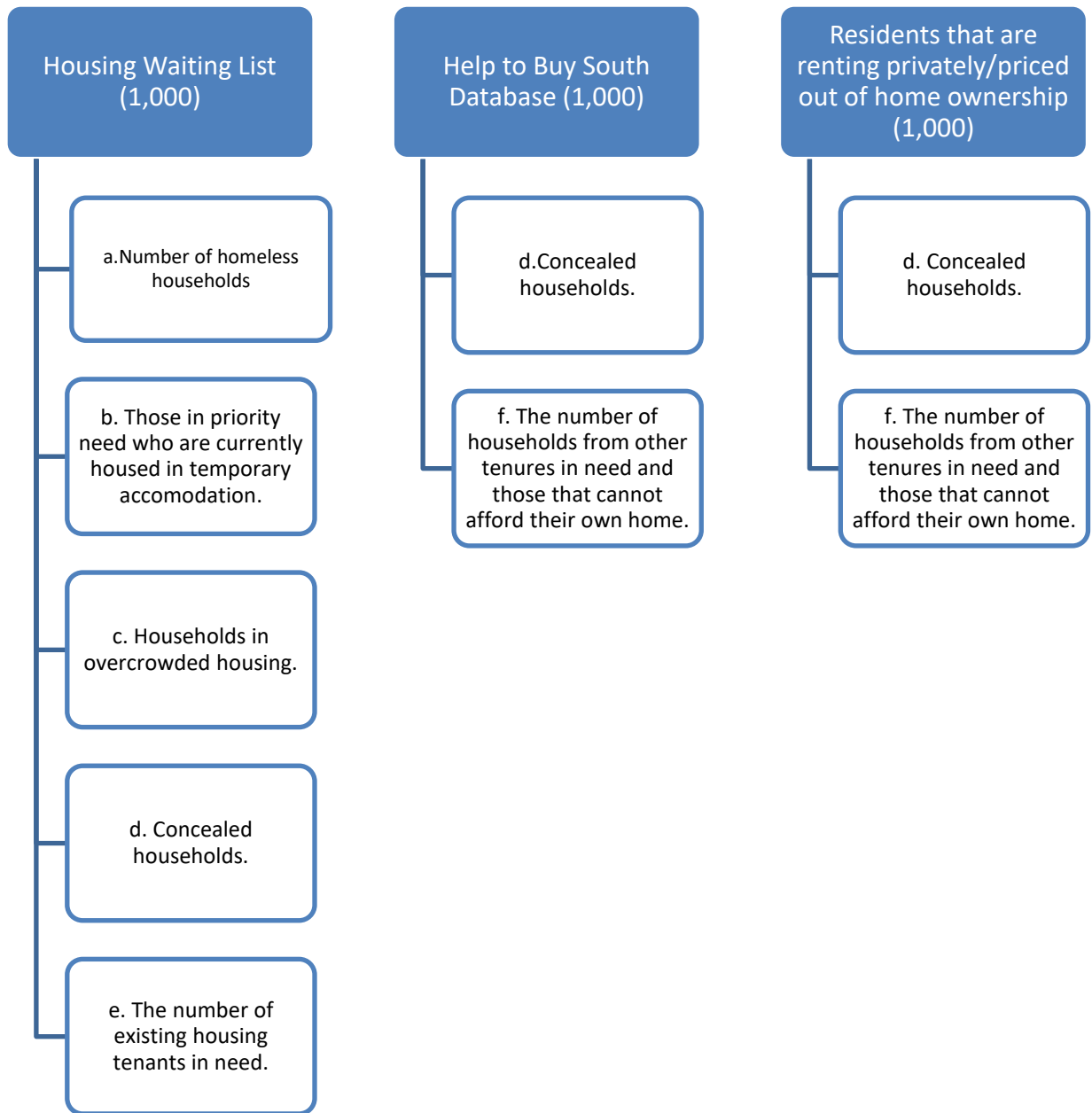
- 9. The Affordable Housing Strategy (HOP001) indicates that 3500 affordable homes will be required from 2021-2036. I am unclear how this figure has been calculated. Furthermore, it does not cover the plan period to 2037. I request that the Council sets this out in detail having regard to the advice in the PPG which sets out how affordable housing need and supply can be calculated. I note that the AMR (GEN006) includes data on affordable housing completions. Can the Council clarify the current level of shortfall, how and when this will be addressed, and whether the forecast need will be met over the plan period?**

The Council's affordable housing need of approximately 3,500 homes as referenced in the Council's Affordable Housing Strategy (HOP001) included the following:

- 1,000 homes identified on the Councils Waiting List for social and affordable rent homes in the borough.
- 1,000 homes identified on the Help to Buy South Database for intermediate homes in the borough.
- 1,000 homes identified for residents in the borough that are either renting privately or are priced out of home ownership.
- An allowance of 500 homes for growth for newly formed households.

The Council can advise that the elements of housing need identified in the PPG were incorporated in how the affordable housing need was calculated. This is explained further in figure 3 below. The Council notes that advice set out in Paragraph 006 of the PPG (Reference ID: 67-006-20190722) in relation to Housing Needs of Different Groups falls across one or more of the need categories identified on page 11 of the Affordable Housing Strategy. Therefore, the need identified at that time is likely to have included an element of double counting.

Figure 3: Affordable Housing Calculation



The Council's Affordable Housing Strategy was adopted in October 2019 and covers the period 2019-2036 (17 years), a longer period of time than the Local Plan (16 years). The Strategy therefore maximises the borough's need requirement. The Strategy takes a cautious approach in terms of calculating the Borough's affordable housing need. As noted above there is an allowance of 500 to incorporate newly arising households in the figure of 3,500. The Council believes this approach allows flexibility in terms of extending the plan period up until 2037.

Despite potential new affordable home delivery being delayed in recent years as part of the wider nitrate issue that affected planning approvals in the borough, the Council do not consider there to be a further shortfall of affordable housing need since the adoption of the Affordable Housing Strategy in 2019. The Council's Housing Team are in the process of undertaking a full review of the Housing Waiting List (as part of a project to implement a new Housing Management software system). Although this process is still underway the current indications are that the true number on the

Council's Waiting List is lower than in the published Strategy. In addition to this, more recent data from Help to Buy South would indicate that those currently registered with an interest in Affordable Home Ownership products has also reduced to circa 750 households. The Council can provide up-to-date need figures when the work is completed, including more clarity on where double counting is likely to occur and potentially indicates a higher need figure than is truly the case.

The Council considers that the supply of affordable homes in the borough will meet the affordable housing need over the plan period. Page 17 of the Affordable Housing Strategy provides details of sites identified at the time (2019) to deliver affordable housing projects. The Council's Housing Team have a growing portfolio of affordable housing sites to meet a portion of the need identified in the Strategy and four more sites were added to the supply through the Revised Publication Local Plan. Furthermore, there are government initiatives such as the Homes England Strategic Partnership Grants that are increasing the affordable housing supply in the borough beyond that required through affordable housing policy requirements.

### **Housing Land Supply**

**10. I note the trajectory at Appendix 1 of the plan. However, paragraph 73 of the National Planning Policy Framework expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period and for plans to set out the expected rate of development for specific sites. As it stands the trajectory does not meet this expectation. For each allocated site, it should indicate the likely start date for delivery and when a site is likely to be completed. Can the Council please provide a revised trajectory?**

The Council's understanding of paragraph 74 (NPPF July 2021) is that plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites, rather than a requirement. In order to produce the trajectory set out in Appendix B of the Submitted Local Plan, there is a trajectory which sets out the expected rate of delivery on each specific site. The delivery assumptions that informed the Local Plan housing trajectory are set out in Appendix 1 of this letter.

**11. The AMR (GEN 006) provides a link to the Council's 5-year housing land position report. The most up to date assessment should be added to the evidence base.**

The most up to date assessment was published in February 2021 as part of the papers for the Planning Committee. This report has been added to the examination library with reference ([FBC009 Housing Land Supply Update Feb 2021](#)). The Council's intention is to publish a new statement in January 2022 with a base date of 1 January 2022. This can be added to the examination library when prepared.

The Council has agreed five Statements of Common Ground with appellants since February 2021 in relation to the 5 year land supply position, the most recent of which was for Land east of Posbrook Lane, Titchfield ([FBC010 Land East of Posbrook Lane Statement of Common Ground Oct 2021](#)) agreed on 19<sup>th</sup> October 2021. This SoCG agreed a 3.57 year supply and was consistent with the previous four SoCGs.

## Welborne Garden Village

### 12. Can I request that the Welborne Plan be added to the evidence base?

The Welborne Plan has been added to the examination library ([FBC011 The Welborne Plan June 2015](#)).

### 13. The delivery of the Welborne Garden Village is important to meeting the housing requirements of the borough over the plan period. Has a Statement of Common Ground or Delivery Statement been agreed with the site promoters? If so, can it be provided? What evidence is there to support the anticipated delivery rates for the site over the plan period and beyond. What is the current position?

The delivery timescales included within the housing trajectory in the submitted Local Plan were agreed with the site promoters and submitted to the Council by their agents David Lock Associates on 26<sup>th</sup> April 2021 as part of the Council's ongoing liaison with the development industry on delivery profiles (table 5). The trajectory was published within the Council's Housing Delivery Test Action Plan ([FBC008 Housing Delivery Test Action Plan June 2021](#)) in June 2021.

Table 5: Welborne Garden Village delivery rates (as of April 2021)

<i>Year</i>	<i>Dwellings Delivered Per Year</i>	<i>Cumulative Dwellings Delivered</i>
2023-2024	30	30
2024-2025	180	210
2025-2026	240	450
2026-2027	240	690
2027-2028	240	930
2028-2029	280	1210
2029-2030	300	1510
2030-2031	300	1810
2031-2032	300	2110
2032-2033	300	2410
2033-2034	300	2710
2034-2035	300	3010
2035-2036	300	3310
2036-2037	300	3610

Following a resolution to grant planning permission in July 2021, the planning consent for the Garden Village was issued ([FBC012 Welborne Decision Notice Sept 2021](#))



alongside the section 106 on 30 September 2021. This significant milestone means preparatory work can now begin onsite to deliver Welborne. A pre-commencement condition was included that related to fully securing the funding for improvements to J10 of the M27. The Details Pursuant to Condition 57 ([FBC013 Junction 10 of the M27 Funding Strategy Nov 2021](#)) was approved on 24 November 2021, funding now being secured for the required improvements to junction 10 of the M27 motorway with Hampshire County Council as scheme promoters.

The developer's approach to delivery of the site is set out in the Welborne Delivery Strategy (see page 69 of [FBC014 Welborne Delivery Strategy Oct 2019](#)). This strategy sets out the approach to land release, investment in infrastructure, the selection of housebuilders and the control of design and safeguarding of the vision for the site.

### **Main modifications**

- 14. In accordance with section 20(7C) of the Planning & Compulsory Purchase Act 2004 (as amended), can the Council confirm whether they wish me to recommend any Main Modifications necessary to rectify matters that make the Plan unsound.**

Should the Inspector conclude that main modifications are necessary to conclude that the Plan is sound, the Council confirms that it would welcome any such recommendations.

- 15. Do the Council have a running list of draft Main Modifications they wish to make in light of representations, SoCG etc. If so, can a copy be provided and placed on the examination web site.**

The Council does not have a list of main modifications as it considers the plan to be sound as submitted. However, the Council do have a list of minor modifications resulting from some representations made, such as organisational name changes, or changes to Government policy or guidance, such as the release of the Defra metric 3.0 for biodiversity net gain and the introduction of First Homes. We would be happy to make this available to the Inspector for consideration at the appropriate time.

I can confirm that your letter of 17<sup>th</sup> November and this response has been added to the examination website with references INSP001 and FBC001 respectively.

Yours sincerely



**Gayle Wootton Head of Planning Strategy and Economic Development**

- Encl.      Appendix 1. Full Housing Trajectory  
              Appendix 2. List of Post Submission Council Documents





HA39	Land at 51 Greenaway Lane	5					5										
HA9	Heath Road, Locks Heath (P/17/1366/OA)	70			35	35											
HA13	Hunts Pond Road, Titchfield Common	38					38										
	<b>Total</b>	<b>984</b>															
<b>Windfall Allowance</b>																	
	Windfall 0-5 years (Small Sites)	102				51	51										
	Windfall 5-10 years (Small and Large sites)	510						102	102	102	102	102					
	Windfall 10-16 years (Small and Large Sites)	612										102	102	102	102	102	102
	<b>Total</b>	<b>1224</b>															
<b>Additional town centre sites in Revised Publication Plan</b>																	
FTC7	Red Lion Hotel, Fareham (P/20/1359/FP)	18		18													
FTC8	97-99 West Street (P/19/1202/FP)	9					9										
FTC9	Portland Chambers, West Street Fareham	6			6												
BL1	Town centre allocation	620										100	100	100	100	100	120
	<b>Total</b>	<b>653</b>															
<b>Additional sites in other existing settlements in Revised Publication Plan</b>																	
HA46	12 West Street, Portchester	8					8										
HA47	195-205 Segensworth Road (P/18/0625/OA)	8			8												
HA48	76-80 Botley Road (P/20/0593/FP)	18		18													
HA49	Menin House, Privett Lane	26						13	13								
HA50	Land north of Henry Cort Drive	55							55								
HA51	Redoubt Court	12					12										
HA52	Land at Dore Avenue	12						12									
	<b>Total</b>	<b>139</b>															
<b>Additional edge of settlement sites in Revised Publication Plan</b>																	
HA53	Land at Rookery Avenue, Swanwick	6					6										
HA54	Land east of Crofton Cemetery (P/20/0522/FP)	180					50	50	50	30							
HA55	Land South of Longfield Avenue	1250				50	100	100	100	100	100	100	100	100	100	150	150
HA56	Land West of Downend Road	550							50	100	100	100	100	100			
	<b>Total</b>	<b>1986</b>															
	<b>OVERALL TOTAL SUPPLY</b>	<b>10594</b>															
	<b>Total</b>	<b>244</b>	<b>501</b>	<b>793</b>	<b>736</b>	<b>609</b>	<b>849</b>	<b>695</b>	<b>617</b>	<b>644</b>	<b>611</b>	<b>801</b>	<b>752</b>	<b>752</b>	<b>652</b>	<b>666</b>	<b>672</b>
	<b>Cumulative Total</b>	<b>244</b>	<b>745</b>	<b>1538</b>	<b>2274</b>	<b>2883</b>	<b>3732</b>	<b>4427</b>	<b>5044</b>	<b>5688</b>	<b>6299</b>	<b>7100</b>	<b>7852</b>	<b>8604</b>	<b>9256</b>	<b>9922</b>	<b>10594</b>

**Appendix 2: List of Post Submission Council Documents**

FBC001 Council response to INSP001.

FBC002 PfSH Joint Committee Report – Statement of Common Ground 2021 – Revisions and Update, Oct 2021

FBC003 Updated Statement of Common Ground between FBC and PfSH (supercedes SCG005) Oct 2021

FBC004 HIWWT Mitigation Scheme Report Decision July 2020

FBC005 Warnford Estate Mitigation Scheme Report Decision Mar 2021

FBC006 Heaton Farms Mitigation Scheme Report Decision May 2021

FBC007 Whitewool Farm Mitigation Scheme Report Decision Oct 2021

FBC008 Housing Delivery Action Plan June 2021

FBC009 Housing Land Supply update Feb 2021

FBC010 Land East of Posbrook Lane Statement of Common Ground Oct 2021

FBC011 Welborne Plan June 2015

FBC012 Welborne Decision Notice Sept 2021

FBC013 Junction 10 of the M27 Funding Strategy Nov 2021

FBC014 Welborne Strategic Design Code Oct 2019