



Fareham Local Plan 2037
Revised

**Representations to
Affordable Housing
Background Paper July
2022**

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Prepared on behalf of Raymond Brown Rookery Properties

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1.0 Introduction

1.1 These representations have been prepared by Southern Planning Practice Ltd (SPP) on behalf of Raymond Brown Rookery Properties who own land at Rookery Farm, Botley Road, Swanwick which was proposed to be allocated as a residential development site in the Supplement to the Draft Local Plan in January 2020; however, it was subsequently removed as an allocation from the Regulation 19 Submission Version of the Local Plan.

1.2 These representations are made in respect of the Affordable Housing Background Paper (FBC089) which has been produced by Fareham Borough Council following the Local Plan Hearings in March 2022 and in response to the Inspector's Post Hearing Letter dated 6 June 2022. The Inspector has invited representations on three topic papers produced by the Council namely this paper on FBC089: Affordable Housing Background Paper as well as FBC090 Revised Housing Supply Topic Paper and FBC077 Windfall Analysis Update. Separate papers have been prepared by SPP in respect of each of these topic papers and together form the further representations by SPP on behalf of Raymond Brown Rookery Properties to this focussed consultation.

1.3 Representations have been made on behalf of our client, Raymond Brown Rookery Properties throughout the preparation of the emerging Local Plan. We also represented our client at the Local Plan Examination Hearings in March 2022. Whilst this statement is not a duplication of the contents of representations previously submitted to the emerging Local Plan or the Matter Statements prepared for the hearings, this statement draws on previous responses where necessary.

1.4 We request to participate in any further hearing sessions which may be held as part of the Local Plan Examination.

1.5 Notwithstanding the new evidence produced by the Council, it is our continued view that the draft Plan remains UNSOUND for the reasons outlined in each of the papers.

2.0. Affordable Housing Provision

2.1 We are grateful to the Council for undertaking more detailed work regarding the affordable housing need and supply; this was clearly a significant gap in the evidence base and therefore in the preparation of the Local Plan, including in the run up to and at the time of the Inquiry. There necessarily remains a concern that the position is now being retrofitted into the Local Plan development strategy and housing allocations, rather than being a fundamental part of the forward planning of the appropriate strategy and allocations being promoted.

2.2 Taking the newly presented figures at face value, the Council concludes at 5.4 that it will be able to meet its affordable housing needs in the Borough across the Plan period. However, even the figures presented show that the affordable housing provision does not actually meet the identified need. It is appreciated that this is not an exact science and therefore there cannot be expected to be a precise figure whereby supply exactly meets need, but the Council is presenting an under-provision of supply to meeting its needs. It is acknowledged that the under provision is not large, but it is still an under provision which is not an acceptable situation and is not a sound basis on which to allow the plan to be progressed.

2.3 There are a number of other points to raise which potentially complicate the position further and bring into question the assertions claimed by the Council. These include:

1. **Table 1: Number of Households on Fareham Housing Register.** Whilst it is understood that there may have been an element of double counting and that there has been a comprehensive review of the available data, the reduction in the number of households from over 1,000 in each of the years 2013/2014 to 2021/ 22 to 552 in 2022; approximately a 50% reduction – requires more detailed analysis and explanation, if it is to be relied upon. It is difficult to find credible that a comprehensive review can lead to such a significant reduction.

2. **Projected Future Needs:** Paragraph 2.3 of the Council's paper sets out the PPG advice regarding current and projected number of households who lack their own housing or cannot afford to meet their housing needs in the market. The paper appears to look primarily at current needs. In respect of future needs paragraph 3.32 sets out that the Council has used the proportion of affordable stock to overall housing stock to represent the proportion that are unable to afford market housing in the calculation of newly arising need in the borough. This is not a logical derivation of projected future need, based solely on affordable housing stock.

Paragraph 3.33 makes the sweeping statement that *There is no reason to believe that there (will be) likely changes in house prices and wages that will impact the future level of households falling into need. (words in brackets added as potentially missing words from the sentence)*. There seems to be no evidential basis for making such a statement, particularly taking into account the current national economic climate and the cost of living crisis.

It is not clear that the exercise to look at future predicted needs has been undertaken comprehensively and can be relied upon – the exercise appears to rely on the existing need rather than projected future need. Whilst again it is appreciated that is not going to be an exact science there appears to be no analysis on potential future trends, taking into account the direction of house prices, affordability ratios and economic factors to derive future projections. At the very least it would be expected that some flexibility would be built in to ensure that provision can keep up with need over the coming period.

3. **Affordable Housing Provision against Housing Allocations** – there is simply insufficient information to enable confidence that the supply of affordable housing against allocations is robust and will deliver a) the overall numbers required and b) in the appropriate timescales. Further, more detailed information is required to allow this position to be considered in further detail. A number of points arise in this regard:

- a) What provision has been made for Welborne given the legal position and the Inspector's findings to date on delivery in the early years?;
- b) The Inspector has removed two town centre sites from the overall provision; what effect does this have on overall supply of affordable housing?
- c) Paragraph 4.4 of the Paper assumes a policy compliant provision of affordable housing. Whilst this must be the Council's starting point it is considered that this needs to be stress tested to look at the impact of a potential reduction in provision. Welborne may be an extreme example of the viability needed to significantly reduce affordable housing provision, but a number of the sites are potentially complicated and may well have their own viability concerns to reduce the contribution they can make to affordable housing provision.



4. **Contingency Reserve;** It is accepted that this is not an exact science but in fact the Council has in many ways appeared to have treated this aspect in that way; it is strongly argued that there needs to be an uplift in the potential numbers in terms of future supply to deal with all the uncertainties in the system.

5. Furthermore, and given the various significant concerns raised in the Housing Land Supply Paper, these all have a bearing and adverse impact on the provision of affordable housing over the plan period.



3.0 Conclusion

3.1 Whilst the further information is extremely helpful, unfortunately for the reasons set out in this paper, it is not possible to have confidence that the Council has properly recorded its affordable housing need or its supply. It is not therefore possible to conclude that the Council has soundly planned to meet its affordable housing requirements over the Plan period. The Plan regrettably continues not to be sound in this regard.