

Local Plan - Consultation July 2022

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Dear Sir/Madam

Thank you for the E-mail of the 4th of July concerning the Local Plan which is currently being considered by the Inspector: Helen Hockenhull BA(Hons) B.PI MRTPI.

The Inspector has requested (as set out in 'The Way Forward' - paragraphs 57 to 61 of the Post Hearings Letter) that the Council undertake a focused consultation on these three topic papers to seek views from those representers who have previously made representations on the following

Revised Publication Local Plan policies:

- ***H1 – Housing Provision***
- ***HP5 – Provision of Affordable Housing***
- ***Appendix B – Housing Trajectory***

and the attendees of the following examination hearing sessions:

- ***Matter 3 – Housing Need and Supply***
- ***Matter 4 – Housing Policies***
- ***Matter 7 – Housing Land Supply***

I, therefore, wish to forward my response for consideration:

Affordable Housing Background Paper

The government defines Affordable Housing to be:

'social rented, affordable rented and intermediate housing provided to specified eligible households whose needs are not met by the market .

This definition seriously underestimates the true Affordable housing need in Fareham. Another accepted measure of affordable housing is 'residual income measures'. This focuses on the level of income that a household has left, after paying for its housing costs. This is useful in indicating whether sufficient income is left for non-housing expenses after paying for housing.

The Local Plan criteria are clear. The plan's objective is to meet the housing needs of this Borough across all sectors of housing need. To achieve this goal Fareham Borough Council must have a clear insight into the true affordable housing need within the Borough.

Paragraph 3.16 of the Provision of Affordable Housing document says:

The 2011 Census showed concealed families totalled 393 families or 1.15% of all families in the borough compared with 1.9% nationally. It should be noted that the infrequency of available data makes it impossible to identify what has changed since the last 2011 Census. Furthermore, the 2021 Census data is not anticipated to be available until spring 2023.

I am astonished to read the word 'impossible' in the above paragraph. It is **NOT** impossible at all to ascertain the Borough's genuine affordable housing need requirements if there is a will to do so. It is not rocket science.

If the Council can consult all households on the Borough's green waste strategy then surely it can find the motivation to consult on housing need. The Council should not merely rely on data from sources that are outdated or not available. Housing Policy will only meet the needs of the borough if the evidence supporting the policy is sound, robust and factually driven.

Reading the revised document, Provision of Affordable Housing, one is left with the impression the Council has merely rejigged the affordable home calculation to fit a projection the Council wishes to convey and is not based on robust affordable housing need evidence.

The households on the Council's Housing Register have fallen from 1125 to 552 in one year. The question is, was there a change in the criteria used to determine/establish whether a family or individual met the parameters to be included on the revised register? If so, for those who were removed from the register, did they still have a housing need that can only be met by the affordable homes criteria?

One of the core arguments for Welborne coming forward was the size of the council's housing register. It is extraordinary while Fareham swells ever larger the Council Housing Register is shrinking. Perhaps Fareham's overall housing need is somewhat exaggerated?

Housing Supply Topic Paper

The delivery of Welborne is key to the Council's 5-year land supply. The crucial question that needs to be investigated is whether Welborne will ever achieve the projected build-out targets that are now being reviewed and set, meet the core promises on infrastructure delivery and meet them in a timely fashion and live up to the design challenges that are almost certain to arise.

In 2015 at the public inquiry into the Welborne Plan, community groups argued that the Welborne Plan was immature and the various targets set at the time were hopelessly opportunistic. The Inquired (2015) was informed by FBC, developers and their various experts the first homes would start in 18 months. Today 7 years on Welborne still hasn't delivered a single home. Developers use the under-delivery of Welborne to take more countryside South of the M27 while the council rewrites the unrealistic strategic targets for Welborne on a yearly bases.

Fareham Borough Council currently doesn't have a 5 year land supply for one reason. The Council and the Welborne developers have never been realistic in their approach to a timeline on the build out of Welborne. This failure to recognise Rome wasn't built in a day is the heart of the Council's five year land supply issue and is directly responsible for large areas of countryside in Warsash and Portchester now being developed.

The Council, developers of Welborne and their various experts have all been found wanting in their projections and the evidence they submitted in 2015. If they were so wrong in 2015 why should the evidence they bring to the table today be believed? Welborne is a complex beast but that should not detract from displaying a level of pragmatism

As we move into a period of financial uncertainty that will almost certainly impact Welborne on several fronts the basic question that needs to be asked is, does the Welborne Plan remain immature and does that label remain true today as it did in 2015. Can Welborne be delivered in the way the Welborne Plan is currently constructed? The public were factually correct on Welborne in 2015, the Council were NOT.

In the document, there is no mention of Welborne and the difficulties that remain to be overcome and yet Welborne remains core to achieving the Council's 5-year land supply.

It is for that reason why Welborne should be reviewed and the viability of the scheme reassessed. The viability of the scheme must be called into question. Today Welborne still has many unanswered questions, a time frame that is hopelessly unachievable, with many infrastructure costs yet to be identified let alone set aside. The Welborne Plan is badly in need of a review and it is in the public interest a full review takes place

Regards

Shaun Cunningham