

Examination of the Fareham Local Plan 2037 - Hearing Statement

Matter 1: Legal Compliance, Co-operation, Community Involvement and Sustainability

1) Unmet Need – Compliance with NPPF Algorithm and 2014 Data

The first issue in the Inspector's MIQ relates to FBC making provision for 'unmet need' from neighbouring boroughs. Whereas I imagine that Fareham is complying with its obligations in this respect, I note that there is always a presumption that Fareham will accommodate unmet need from its neighbours rather than the other way around.

I have complete sympathy with Gosport, which is already 70% built upon, and do wonder how any NPPF can demand that more housing be developed there. Portsmouth may be similar. However, Fareham is itself nearly 40% built upon. If there is unmet need across the sub-region, this should be taken up by other areas in the county (or beyond) which are significantly less densely developed.

I will mention here (as there does not seem to be any other place to raise this), that the government is inexplicably and indefensibly insisting that the NPPF algorithms should use old ONS data from 2014 rather than more recent 2018 data. A bizarre stipulation given the modern mantra of 'following the science' but presumably this is part of the 'Legal Compliance' that the Local Plan must observe.

If, as would be sensible, the more recent data was used, Fareham's housing requirement would be a lot less (403 p.a. rather than 541 p.a., I gather). The original 2020 Publication Local Plan would still stand, and be a lot less controversial (it was at least consulted upon).

I understand that many of our neighbouring boroughs would conversely have a higher demand using the 2018 statistics. They are in fact being asked for LOWER numbers than 'following the science' would suggest, whereas Fareham is already providing MORE. If there were to be any transfer of housing requirement it should in fairness be going the other way.

So, the NPPF allocations are not working well. Notwithstanding the no-brainer use of out of date statistics, the calculations seem to be resulting in more houses being required where housing is already dense. We see this with Fareham, Gosport, Portsmouth getting concreted over while Winchester, Romsey, etc., get less (those they do get seem to get built right on our borders!).

Nationally, this is seen as further packing into the south-east. The government policy to build 300,000 houses per year is not even claimed to 'house the homeless' or to 'help first time buyers' – its about 'generating economic activity'. However, it is creating a vicious circle in the south-east that is contrary to the stated 'Levelling Up' policy. Also, the 'Brexit' policy should be reversing the trend that encourages businesses in the south-east for EU import/export advantages to a more national spread for global trade.

I daresay that these proceedings are not going to directly precipitate a rethink of Planning Policy, but I would hope that the Inspector will observe that this is another example of things not working right, and will feed this back to her Minister, preferably publicly.

So why do I mention it here? Well, I have written to my MP, Caroline Dinenage about this (Yes, she is the MP for Gosport rather than Fareham, but curiously more that 50% of the additional housing required in this 'Revised' publication plan has been placed in her constituency rather than the 'Fareham' parliamentary constituency). She says that "**Ministers have taken on board the concerns raised [about the 2014 ONS data] and have advised that local Councils are able to use mitigating factors in their Local Plans**". Our Council Leader, Mr Woodward, says he has petitioned ministers

about this, but he seems to have failed to get any mitigating reduction – surprising really, as he would seem to have a ‘slam-dunk’ case in respect to the demand data now available.

Something is not adding up. Is it not possible, at this late stage, for the Inspector to apply some common-sense view and require that an appropriate reduction is made, re-instating the original Published Plan?

2) Community Involvement

Let us be absolutely clear about one thing, the Revised Local Plan that we are discussing, was absolutely NOT produced or influenced by any public consultation regarding its contents or proposals. It **was** published and presented at public ‘CAT’ meetings, but the producers were adamant that they were not interested in making any revisions to this document based on public feedback. Instead, comments would be collected and passed on to the Inspector.

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The consultation begins on Friday 18 June 2021 and comments must be received by us no later than midnight on Friday 30 July 2021.

The representations made within this period will be submitted to a Planning Inspector for independent examination on behalf of the Secretary of State.

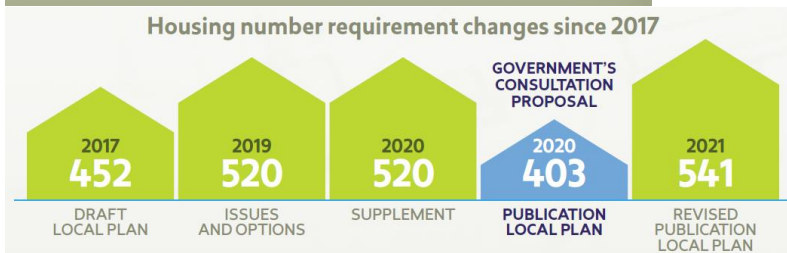
The mechanism to submit comments was excruciatingly tedious and intimidating, demanding that submissions must be about legality, co-operation or ‘soundness’ and linked to a particular policy, proposal or official document (limited to a small number of documents produced since the original plan). The submissions you have seen have come from a web-form which allowed no formatting, paragraphs, headings, links or diagrams. Text is compressed and unstructured.

Neither was there any debate by the full council. It was presented as a ‘must be confirmed’ motion and carried by a party whip (please ask lay councillors to confirm this). The Revised Plan is radically different to the previous Published Plan, but it is the proposal of a small group of people, let’s say ‘The Executive’, but I am not sure if all members of the council executive were involved or if non-council people contributed. Now is the first time anyone outside of the ‘cabal’ has been allowed to influence matters. Not surprisingly, objectors have been whittled down to the very dogged.

What we have is the preferred solution, from a small elite, to the problem produced by the Government u-turning on the use of more recent 2018 statistics for the NPPF calculations resulting in a much higher housing demand on Fareham.

Now you might believe that this Executive are not bad people, just folks trying to fix a difficult problem. That may be true, but this is a partisan solution from a small group of people with particular local interests. It may be generally ‘legal’, and it may be ‘co-operative’ but it is not necessarily the best solution or even a good solution.

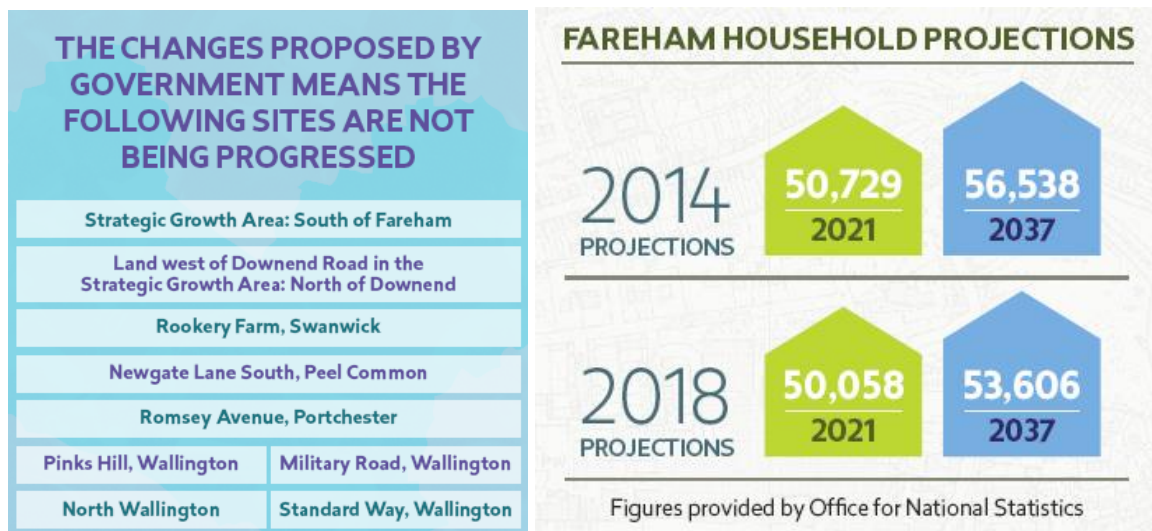
To understand the evolution of this Plan, you would need to see how some of the ideas have emerged as housing requirement numbers have changed



Prior to 2019, FBC had a very clear policy driven by a Core value; ***to maintain the physical and visual separation of the town and village settlements and preserve their individual character***. This has been underpinned by a Core Strategy (CS22) and the definition of ‘Strategic Gaps’ wherein there would be a presumption against major development. As I have documented elsewhere, this Gap was defined by the ‘David Hares Gap Review’ as a number of sub-areas determined as ***‘no more land than necessary to prevent the coalescence of settlements’***. The definition and methodologies were challenged but robustly reviewed and ultimately upheld by the Council, various Planning Inspectors and independent landscape studies.

Then in 2019 the new NPPF came along, and The Executive started to rethink and shift its position regarding the Gap. After a heavily skewed ‘consultation’ about options, a Draft Plan Supplement emerged with plans to change the whole Stubbington-Fareham Gap into a ‘Strategic Growth Area’ (i.e., completely reversing the purpose of the Gap). The Gap was ‘The Executive’s preferred go-to area for all housing development up to 2050.

This drew a lot of criticism and objections, and (no doubt with elections in mind) the original Published Local plan came out at the end of 2020, informed by changes proposed by Government based on the newly available 2018 ONS statistics, with the Strategic Growth Areas removed:



‘Peace in our time’ we might have thought, public feedback has been listened to. But the Government U-turned and a new requirement for 541 homes p.a. emerged. This was known about in Nov-Dec 2020, I understand, but instead of engaging with the public about how to address this problem, it was kept very quiet until after the May 2021 elections. Only then did the ‘Revised Published Local Plan’ come out. The issue of development land allocation could have had wide public engagement as part of the May elections, but this did not happen.

The most obvious change in the Local Plan since the original Published Plan, is the additional 2,779 houses proposed, most of which (51%) have been planned in the Fareham-Stubbington Strategic Gap. Specifically this involves two proposals (HA54 and HA55) virtuously opposite each other, encroaching into the Gap, which has already been weakened by the Stubbington By-pass squeezing between them.

So why would the Executive propose this, clearly abandoning the robustly held concept of settlement separation (although they would claim that The Gap's function is not affected)?

You have to remember that the Council is dominated by one party and The Executive have absolute control over it (the failure of some Conservatives to separate as 'Independents' in the last election demonstrates this). But this is not necessarily a party-political issue. Nearly all of The Executive, and most of the Councillors that have got onto the Planning Committee represent Wards to the West of the borough. Also, they are able to direct council officers and commission friendly reports.

When you look at how the additional housing has been allocated, you will see that virtually all of it (99%) is pitched on the Eastern half of the borough. And that's not including Welborne (also on the east).



Was this the BEST solution that The Executive could come up with or is it Gerrymandering? Having sailed through the May elections with a seemingly popular Local Plan, the councillors probably did not want to be seen to be betraying their own electors. Stubbington and South Fareham have no councillors on the Executive or the Planning Committee.

It might also be noted that the Local Plan also includes adding a new ASLQ for the 'Chilling-Brownwich Coastal Plain' (bigger than any of the previously proposed ASLQ) thus ring-fencing any remaining land in the Western half of the borough from future development. It would seem that The Executive would rather concrete over the whole of the East of the borough rather than have any

more houses in the West. Countryside in the east, performing the important strategic function of preventing settlement coalescence, is being given up for housing whereas similar countryside in the west gets a higher level of protection.

By inspection of pages 22 and 23 of the Local Plan, it can be seen that what was once a fairly even spread of new development across the borough, has become decidedly lop-sided without any public consultation about this approach. This does not seem to be the result of any widely agreed consensus. It is an 'Executive Decision', arguably borne out of self interest rather than 'soundness'.