

# **Fareham Borough Council Local Plan**

## **Examination in Public**

### **Hearing Statement**

#### **Matter 3 – Housing Need and Supply**

Prepared on behalf of

**Vistry Group PLC**

February 2022

# Document control

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## 1.0 INTRODUCTION

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- 1.1 Tetra Tech Planning have been instructed by Vistry Group PLC (hereafter 'Vistry Group') to participate in the Examination of the Fareham Local Plan 2037.
- 1.2 Vistry Group have an opportunity to bring forward development at Land at Pinks Hill, Wallington, as identified on the plan attached at Appendix 1. We have previously made representations in response to the Regulation 19 Fareham Revised Publication Local Plan 2037 consultation (July 2021) in addition to representations made earlier on in the preparation of the Fareham Local Plan.
- 1.3 This Hearing Statement sets out our client's position in relation to Matter 3 of the Examination which relates to Housing Need and Supply. Vistry Group's interest in this matter emanates from their interest in promoting land at Pinks Hill for development.
- 1.4 Careful consideration has been given to the Inspector's Matters, Issues and Questions (INSP004) and the relevant published examination material available on Fareham Borough Council's (FBC) Examination webpage, all of which has informed the contents of this Statement.
- 1.5 This Statement will expand on the points made during the Regulation 19 consultation in relation to housing requirement and delivery, affordable housing and the duty to cooperate in terms of meeting unmet need. It will conclude that in order for the plan to be justified and sound, modifications should be made through increasing the buffer to the overall housing need to address the issues and shortcomings identified.
- 1.6 This Statement should be read alongside our Regulation 19 representation, as well as the separate Hearing Statements submitted in relation to Matter 2 (Development Strategy) and 7 (Housing Land Supply).

## 2.0 HOUSING REQUIREMENT AND AFFORDABLE HOUSING

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- 2.1 The plan states that the annual housing need is 541 per annum over the plan period (a total need of 8,656 over the 16-year plan period). Table 4.2 of the plan states that there is sufficient land to deliver 10,594 new dwellings over the plan period.
- 2.2 We are pleased to see and support, FBC's use of the adopted Standard Method for calculating housing need as the starting point for assessing the housing requirements of the Borough and are pleased that FBC is committed to meeting their objectively assessed need. However, there are a number of concerns in relation to the amount of housing planned for the Borough being insufficient and the strategy by which the housing is distributed.
- 2.3 The plan states that a minimum of 10% additional supply is suggested by the Planning Inspectorate but given the reliance on large sites within the supply, a precautionary 11% is proposed by the Council. We suggest a much larger buffer between the identified housing need and actual supply is needed to make sure the plan is flexible and robust enough to deliver the required amount of housing. A 1% contingency is not considered sufficient to ensure enough flexibility is allowed for in the plan, particularly given reliance on delivery rates of 290 units per annum at Welborne after 2025/26, reliance on other large-scale sites as well as FBC's recent track record of under-delivery.
- 2.4 In January 2021, the Government published the 2020 Housing Delivery Test (HDT) results which confirmed FBC's delivery to be 79% and as a consequence, the 20% buffer was applied. By January 2022, the Government published the updated 2021 HDT results which confirms a worsening performance, with a delivery rate of just 62%, meaning the NPPF's presumption is now applied.
- 2.5 FBC is reliant upon strategic sites to supply much of its housing requirement. Delays in the delivery of such sites are not uncommon, for example due to infrastructure delivery delays and this overreliance on large sites has proven unsuccessful in Fareham historically. The NPPF notes that *"small and medium sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly"*<sup>1</sup>. Therefore, additional smaller to medium sized sites should be identified to supplement the larger sites and a greater buffer should be applied to provide increased robustness and flexibility to the plan so that delays in delivery of strategic sites do not compromise the deliverability of the plan. A buffer of circa 20% would seem more appropriate given the risks to housing delivery in the borough, the current housing land supply position and the particular reliance on a single, very large strategic site.
- 2.6 To make the plan sound, FBC need to increase the housing need through an increased buffer and with a greater number of smaller sites that can deliver in the early part of the plan period. Due to

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<sup>1</sup> NPPF paragraph 69

such reliance upon strategic sites to supply much of its housing requirement, it is considered a greater buffer between the identified housing need and actual supply should be applied, to ensure that delays in delivery of strategic sites do not compromise the deliverability of the plan.

### **Affordable Housing**

- 2.7 The plan notes that the Planning Practice Guidance (PPG) makes clear one of the reasons a higher housing need figure could be adopted, is if the need for affordable housing is greater than that likely to be delivered. The plan goes on to state that the Council's affordable housing need will be met and so there is no further requirement for an adjustment of the need figures<sup>2</sup>. However, the PPG confirms that the standard method "*identifies a **minimum** annual housing need figure<sup>3</sup>*" and should not be taken as a ceiling figure. The plan should therefore be more aspirational in its plans for housing provision, as per paragraph 16 of the NPPF.
- 2.8 The Welborne Garden Village development originally proposed to provide a minimum of 30% affordable housing, however this has now been reduced to a minimum of just 10%, depending on the outcome of a viability review which is to be submitted prior to the submission of a reserved matters application. This anticipated reduction in affordable housing provision will have a disproportionate effect on the overall affordable housing delivery in the Borough and should therefore be met elsewhere. The Plan should increase the overall housing requirement to assist with AH provision.
- 2.9 The plan notes that "*there is an acknowledged housing need, and affordability is an issue for first time buyers and households on low incomes who cannot access home ownership<sup>4</sup>*". According to FBC's Affordable Housing Strategy (2019), the need for affordable homes in the Borough is in the region of 3,000 households and the waiting list currently stands at around 1,000 households. It also estimates that at least a further 1,000 households are privately renting or sharing parental homes, because young families are priced out of home ownership.
- 2.10 The plan should therefore take this into account when devising its housing need and adopt a higher figure and allocate more sites to allow for greater affordable housing provision across the Borough, particularly given the disproportionate effect even a slight reduction in affordable provision on Welborne would have on overall affordable housing delivery.
- 2.11 To make the plan sound, FBC must better improve affordability in the Borough.

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<sup>2</sup> Paragraph 4.3

<sup>3</sup> Paragraph 002, reference ID: 2a-002-20190220

<sup>4</sup> Paragraph 1.42

### 3.0 UNMET HOUSING NEEDS FROM OTHER LOCAL AUTHORITIES

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- 3.1 There is a significant unmet housing need across the South Hampshire region, particularly Portsmouth, which the plan states have written to FBC requesting a contribution of 1,000 dwellings to their unmet need. Havant Borough Council has confirmed it does not propose to meet any of Portsmouth's unmet need and the Push Spatial Position Statement (June 2016) states that *"there is a very constrained supply of land in Gosport, Havant and the Totton/Waterside area of New Forest and on the Isle of Wight, which limits the ability of these areas to meet their identified housing needs in full"*<sup>5</sup>
- 3.2 In addition, in the Gosport Statement of Common Ground (SOCG) (September 2021), Gosport Borough Council identifies an unmet requirement of approximately 2,000 dwellings. The majority of its proposed development in its emerging Local Plan will take place on brownfield land which have a number of challenges, including the need to provide enhanced flood defences, contaminated land issues and ensuring internationally important habitats are not harmed.
- 3.3 According to the latest SOCG published by the Partnership for South Hampshire (PfSH) in October 2021, there is a housing shortfall of 13,000 dwellings up to 2036, an increased shortfall of 2,250 from that of the September 2020 SOCG. In addition, Portsmouth City Council's unmet need has now risen from 669, as stated in paragraph 4.5 of FBC's Plan, to 800 dwellings and Portsmouth maintains its request to FBC to accommodate some of this unmet need.
- 3.4 The Fareham plan confirms that it is making provision for 900 homes to contribute towards the wider unmet need issue. PfSH has agreed that there is a need for its constituent authorities to work together and the NPPF makes clear that *"effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help determine...whether development needs that cannot be wholly met within a particular plan area can be met elsewhere"*<sup>6</sup>.
- 3.5 There are suitable, available and achievable development sites in the borough being promoted by housebuilders and FBC is relatively unconstrained by designations when compared with other PfSH authorities. It is therefore considered that FBC should be contributing further to this growing housing shortfall and wider unmet need across the South Hampshire region.

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<sup>5</sup> Paragraph 5.28

<sup>6</sup> NPPF paragraph 26

- 3.6 The Plan in its current form is not effective in its contribution towards the significant unmet housing need across the South Hampshire region and FBC should be contributing further to this wider unmet need for the above-mentioned reasons.



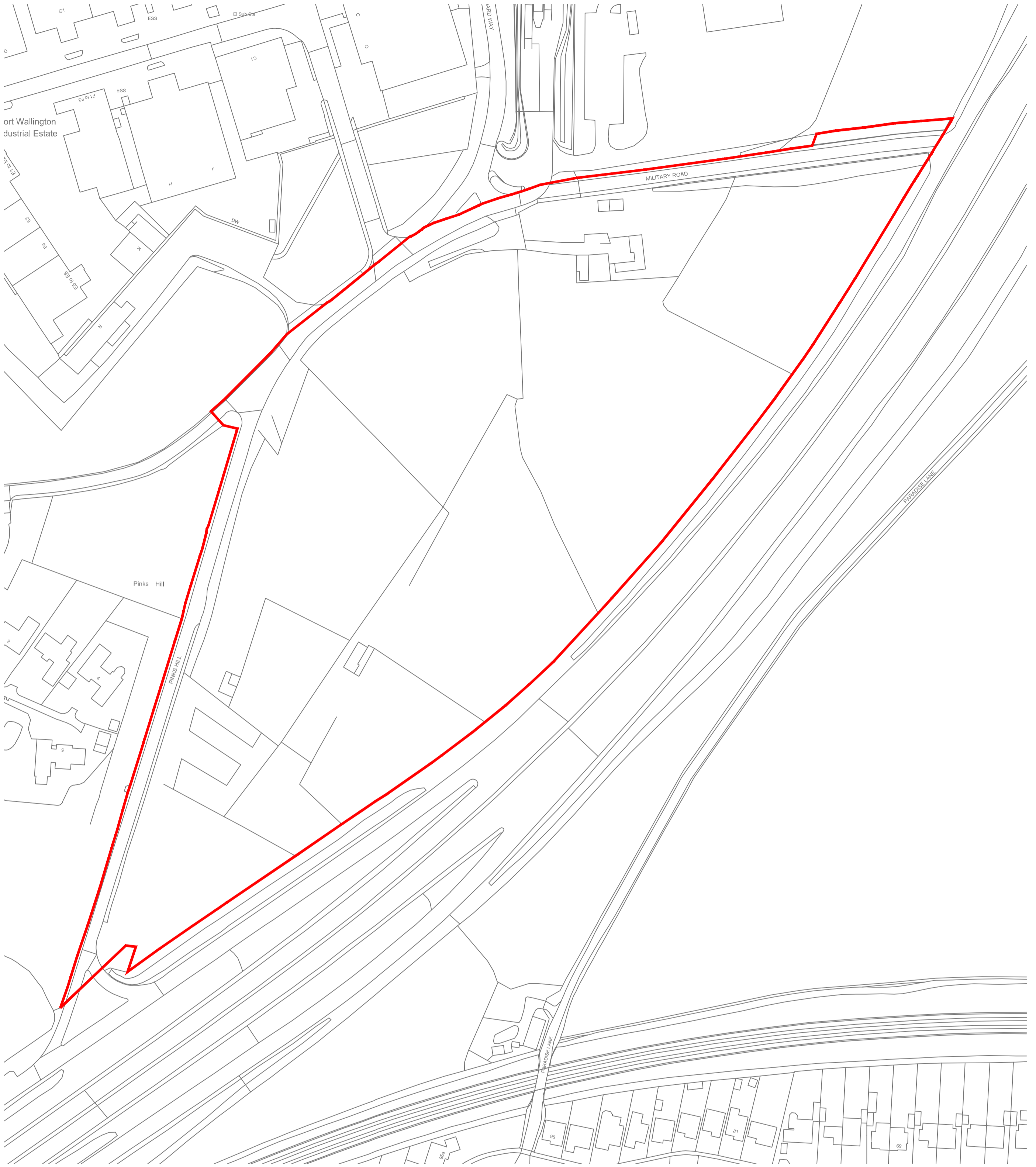
## 4.0 SUMMARY

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- 4.1 In overall response to questions 1-14 of the Inspector's MIQs, it is demonstrated in this Statement that the plan in its current form is not considered justified or sound and should not be adopted as it currently stands.
- 4.2 The housing strategy is not effective, particularly due to FBC's reliance on large scale strategic sites to supply much of its housing requirement, uncertainties over the delivery and rates of delivery of Welborne Garden Village and FBC's historic under-delivery. The PPG makes clear the standard method is a minimum and the Government is committed to supporting ambitious authorities who plan for growth.
- 4.3 Affordable housing provision at Welborne Garden Village is anticipated to drop to just 10%, which will have a disproportionate effect on the overall affordable housing delivery in the Borough. The affordability need short-fall caused as a result of this should therefore be planned for and met elsewhere.
- 4.4 The plan is neither positively prepared, nor effective in its contribution towards the significant and growing unmet housing need across the South Hampshire region. Given there are suitable, available and achievable development sites in the Borough, (including the site at Pinks Hill), which is relatively physically unconstrained when compared with PfSH authorities, it is considered that FBC should be contributing further to this wider unmet need.
- 4.5 To make the plan sound, FBC should increase the housing need through an increased buffer. Due to such reliance upon strategic sites to supply much of its housing requirement, it is considered a greater buffer between the identified housing need and actual supply should be applied, to ensure that delays in delivery and rates of delivery of strategic sites does not compromise the deliverability of the plan.
- 4.6 The plan should also allow for a higher housing requirement and the allocation of a larger number of small and medium sized sites over 10 units, as this would allow the Borough to better meet not only its overall housing need, but also its acute affordable housing requirements. In particular, the site at Pinks Hill will deliver affordable housing to help meet this potential reduced provision at Welborne Garden Village. Finally, a higher housing requirement should be adopted to take on the growing unmet housing need across the South Hampshire region.

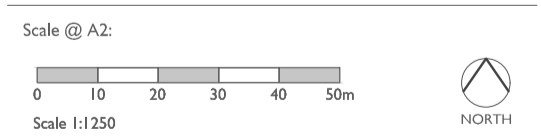
## APPENDIX 1 – PINKS HILL SITE LOCATION PLAN

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Application Boundary  
15.438ac / 6.247ha



Rev	Date	Drawn	Checked

Project:  
LAND AT PINKS HILL.  
FAREHAM

APPLICATION  
BOUNDARY

Client:  
**Vistry Group**

Date: FEBRUARY 2022  
Drawn by: MC      Checked by: BB  
Drg No: CB\_78\_214\_PARAM\_001      Rev:

