

Examination of the Fareham Local Plan 2037 - Hearing Statement – N John

Matter 3: Housing Requirement

1) Unintended Consequences of Inflated Housing Targets

The key point I want to make here is that, by producing a Plan for what I believe are highly inflated Housing numbers, the WRONG development will take place.

Even with the dubious NPPF algorithms, the calculated housing demand to meet our share of the government's objective is much lower than the numbers this plan is attempting to accommodate.

The consequence is that various highly inappropriate sites (for example degrading the Stubbington Strategic Gap) are thrown into the pot to make up the numbers. These are the juicy, easy, highly profitable ones that developers want but are most damaging to the environment. We are giving up green field sites which have been open countryside since the last ice-age.

But of course, these are the sites that will immediately get developed first (it's starting already).

In practice the basic NPPF target will probably be met but the 541 houses p.a. will not. Fareham has never delivered more than 300 p.a. I understand.

What will happen is, the easy green fields will get done quickly, the 3HDT will soon be met so that the 20% uplift is removed. With a 5YHLS defined, Fareham will again be able to use the full breadth of its housing policies to scrutinise planning applications rather than the reduced DSP040 threshold.

The Executive will instruct officers to dig in on the applications it does not favour.

At the end of the day some of the sites in the Original 403 houses p.a. Local Plan will not be delivered but the new 'last resort' proposals added to the Revised Plan will be.

The environment and local communities will be the losers and Property Developers will be the winners. Where will they be making their political donations next year I wonder?

Government Targets

This problem starts with Govt policy to deliver 300,000 new homes nationally. This is not particularly driven to 'house the homeless' or help first time buyers. The objective is to stimulate economic activity. Another stated policy is to 'level up' the economy across the country, but these policies are not working together. Post BREXIT, there should be less focus on the EU-facing South-East, and more business North and West. The **NPPF algorithm** appears to support a vicious circle of targeting more houses in the SE where there are jobs instead of boosting the economy elsewhere. South Hants is vastly over built but just getting worse.

Bad Science

The decision to use 2014 stats is indefensible. FBC should be claiming a mitigating factor that more recent ONS stats indicate a lower demand.

Counter-productive Uplift

The NPPF number is then inflated by 20% because HMG are sceptical about FBCs ability to deliver due to its recent failure to meet 3YHDT. This is largely due to Nitrates restrictions and HMG should take this into account. Rather than concoct 'too clever by half' mitigation schemes, HMG should

recognise the serious environmental 'algae' issue and look to REDUCING nitrates rather than 'net zero'.

HMG does not actually want FBC to deliver more houses than are needed (silly), the buffer is a safety margin. Why then does FBC add an additional 11% margin on top for the same reason?

Unmet Need

As neighbouring councils appear to be benefitting from the 2014 stats U-turn, while Fareham loses out, the 'Unmet need' adjustments should reflect this, i.e., neighbouring councils take some of Fareham's demand.

FBC is not generally delinquent on housing delivery. The Welborne project is finally coming together but the ramp up is slow. With a reasonable expectation of high housing delivery in later years, HMG should allow a slower start up. The desperation to grab low hanging fruit, meet 3YHDT and avoid the 20% buffer is driving FBC to make BAD proposals.

FBC do not seem to be pushing back much. The Inspector may see her role as squeezing as many houses out of apparently compliant councils and keep his (or her) powder dry for those that 'dig-in'. Hopefully, in the public interest, she will on inspection recommend that FBC lower the targets.