



Home Builders Federation

Matter 7

FAREHAM LOCAL PLAN EXAMINATION

Matter 7 – Housing land supply

Is the reliance on Welborne Garden Village to deliver half of the housing requirement for Fareham justified as the most appropriate way of achieving sustainable development, the supply of new homes and the growth of the borough? If not, what are the alternatives?

The HBF supports the allocation of large sites and recognises the vital contribution they make in addressing housing needs across the country. However, we are concerned that many local plans which allocate such sites fail to provide sufficient homes in the early years of the plan to support a more balanced supply across the plan period and provide the necessary contingency to take account of the risk of delays to larger schemes. The allocation of further sites that would deliver in the early part of the plan period would have enabled a more consistent supply across the plan period and provided the necessary buffer to ensure that any potential delays or slower delay on larger sites does not require the plan to be regularly updated.

Does the plan provide sufficient contingency should this site be delayed? Is the 11% additional supply set out in para 4.12 adequate?

The HBF welcomes the 11% contingency in overall supply but given the fact that over 50% of the requirement will be from just three large sites we are concerned that the contingency is insufficient. Whilst we accept that the Council is required to review its plan every five years, we would suggest that in order to be effective and deliverable over its plan period the supply of developable sites should be increased from the start rather than seek to address problems as they arise over the plan period.

The Framework in para 69a) requires that land to accommodate at least 10% of the housing requirement on sites of 1 hectare or less should be allocated unless there are strong reasons why this cannot be achieved. Paragraph 4.13 of the Plan demonstrates that for Fareham this figure is 9.4%. What is the justification for this target not being achieved?

The Government have recognised the importance of having small sites allocated in local plans in order to support smaller and medium sized house builders who face disproportionate costs and higher risks in bring forward sites. The Government's drive to support smaller developers recognises the contribution they make in ensuring that more homes can be delivered more quickly as well as ensuring a diversity of homes in



an area to meet consumer demands. We therefore recommend that as a minimum the Council ensures that 10% of its requirement comes forward on sites of 1 ha or less.

What compelling evidence is there in accordance with paragraph 71 of the Framework that windfall sites should be part of the anticipated supply? Are the windfall projections in Table 2 of the Housing Windfall Background Topic Paper. ie. 51 dwellings on both small and large sites over the plan period justified?

No comment.

Does the Council apply a lapse rate for sites with planning permission or with resolutions to grant subject to a s106 agreement which may be delayed or do not come forward?

It is inevitable that some sites with planning permission will not come forward within the first five years of the plan and as such the Council should apply a lapse rate on this aspect of their housing supply.

What assumptions have been made to inform the trajectory for the delivery of housing sites in terms of lead in times for grant of full planning permission, outline and reserved matters, and conditions discharge; site opening up and preparation; dwelling build out rates; and number of sales outlets? Are they appropriate and justified?

For Council.

What evidence is there to support the anticipated delivery rate of Welborne Garden Village? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?

It is important that the Council ensures that it estimates with regard to the delivery of this strategic site are cautious and do not seek to set an overly optimistic delivery trajectory. As we set out in our representations the Lichfield report Start to Finish indicates that on average schemes of over 2,000 units will take 2.3 years between the plan being approved and the first home being built. Whilst some schemes may come forward more quickly equally other will take longer for a variety of reasons. As such relatively short time periods between the granting of planning permission and the first homes being delivered must be treated with caution and thoroughly evidenced. The consequences of any delayed delivery should also be examined by the Council. For example, if Welbourne Village were to start delivering in 2025/26 rather than 2023/24, this could mean the Council having a marginal five-year land supply from 2025/26 if the surplus in previous years is proportioned across the remaining plan period (see appendix A). However, if the surplus is not treated in this manner and ignored, as was the case in appeal on Land South of Oakridge, Highnam, (APP/G1630/W/17/3184272), then there would be a shortfall in the five-year land supply from 2024/25. The hope is that this site will deliver as expected but it would be prudent, given the reliance on this site to meet housing needs, to allocate further land for housing development to ensure the five-year land supply is maintained.

Overall, does the Plan allocate sufficient land to ensure the housing requirement of the borough will be met over the plan period? Is the average delivery of 720 homes per annum in 2028-29 and 2036-37 achievable considering past delivery in the borough?

As set out in our representations the HBF would consider a 20% contingency is the necessary to provide the certainty that needs would be met over the plan period.

Five-year housing land supply

Would the Council be able to demonstrate a 5-year supply of deliverable housing sites on adoption of the Plan and a rolling 5-year supply throughout the plan period?

See above.

Is there a need for and are there any additional sites which could contribute to the first 5 years' supply post adoption should delivery of any of the allocated sites stall in the first 5 years?

On the basis of the Council's housing trajectory, we would agree that there is a five-year housing land supply on adoption. However, should the garden village site not come forward as expected we are concerned that the Council will not have a five year housing land supply for the majority of the plan period.

If I were to conclude that a 5-year supply of specific, deliverable housing sites would not exist on adoption, what would be the most appropriate way forward for the Plan?

If there was not considered to be a five-year land supply on adoption, we would suggest that further small sites would need to be allocated that would deliver homes in the first five years of the plan.

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Appendix A: Five-year land supply based on Welbourne Village commencing delivery in 2025/26

| | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 | 28/29 | 29/30 | 30/31 | 31/32 | 32/33 | 33/34 | 34/35 | 35/36 | 36/37 |
|--------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Requirement | 300 | 300 | 300 | 545 | 545 | 545 | 545 | 720 | 720 | 720 | 720 | 720 | 720 | 720 | 720 | 720 |
| Cumulative | 300 | 600 | 900 | 1,445 | 1,990 | 2,535 | 3,080 | 3,800 | 4,520 | 5,240 | 5,960 | 6,680 | 7,400 | 8,120 | 8,840 | 9,560 |
| Delivery | 244 | 501 | 763 | 556 | 399 | 789 | 695 | 577 | 584 | 591 | 801 | 752 | 752 | 652 | 666 | 672 |
| Cumulative | 244 | 745 | 1,508 | 2,064 | 2,463 | 3,252 | 3,947 | 4,524 | 5,108 | 5,699 | 6,500 | 7,252 | 8,004 | 8,656 | 9,322 | 9,994 |
| Surplus/ deficit | -56 | 145 | 608 | 619 | 473 | 717 | 867 | 724 | 588 | 459 | 540 | 572 | 604 | 536 | 482 | 434 |
| Five-year requirement | 1,990 | 2,235 | 2,480 | 2,900 | 3,075 | 3,250 | 3,425 | 3,600 | 3,600 | 3,600 | 3,600 | 3,600 | | | | |
| Add deficit/ surplus | 1,990 | 2,254 | 2,428 | 2,666 | 2,817 | 3,035 | 3,067 | 3,118 | 3,148 | 3,180 | 3,218 | 3,060 | | | | |
| Buffer | 398 | 113 | 121 | 133 | 141 | 152 | 153 | 156 | 157 | 159 | 161 | 153 | | | | |
| Total req | 2,388 | 2,366 | 2,550 | 2,799 | 2,958 | 3,187 | 3,220 | 3,274 | 3,305 | 3,339 | 3,378 | 3,213 | | | | |
| Five-year supply | 2,463 | 3,008 | 3,202 | 3,016 | 3,044 | 3,236 | 3,248 | 3,305 | 3,480 | 3,548 | 3,623 | 3,494 | | | | |
| Surplus/ deficit | 75 | 642 | 652 | 217 | 86 | 49 | 28 | 31 | 175 | 209 | 245 | 281 | | | | |
| 5YHLS | 5.16 | 6.36 | 6.28 | 5.39 | 5.15 | 5.08 | 5.04 | 5.05 | 5.26 | 5.31 | 5.36 | 5.44 | | | | |



