

Fareham Borough Council Local Plan

Examination in Public

Hearing Statement

Matter 7 – Housing Land Supply

Prepared on behalf of

Vistry Group PLC

February 2022

Document control

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1.0 INTRODUCTION

- 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 7 of the Examination which relates to Housing Land 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 supply and delivery and will conclude that in order for the plan to be sound, modifications should be made by avoiding such reliance on a single, very large strategic site at the expense of smaller sites and by applying a greater contingency to ensure increased robustness and flexibility.
- 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 Matter 3 (Housing Need and Supply).

2.0 HOUSING LAND SUPPLY

Housing Trajectory and Lead-in Times

- 2.1 The housing trajectory at Appendix B of the plan shows a minus figure and under-delivery of 56 dwellings below the cumulative housing requirement in 2021/2022, with this loss forecast to be made up in the latter years of the plan period.
- 2.2 The trajectory of Welborne Garden Village, which is anticipated to account for approximately 40% of the supply for the plan period, remains highly uncertain, with problems in the past relating to challenges over land ownership, lack of funding for proposed improvements to junction 10 of the M27, significant reductions to the amount of affordable housing and questions over viability, and subsequent delays moving through the planning system. The delivery timescales for Welborne have been consistently overstated and failed to materialize over the years.
- 2.3 The Housing Delivery Test Action Plan (June 2021) states: *“The housing trajectory set out in the adopted Local Plan Part 3 anticipated the site would commence in 2016/17, delivering 1,160 homes by April 2021. Delivery at Welborne has been affected by a number of factors including the resolution of land ownership issues, and the design and funding of the M27 motorway junction. To date the site has yet to commence building. These issues have led to the revision of the original delivery trajectory (see Table 2 below) with the first dwellings now anticipated to be completed in 2023/2024”.*
- 2.4 Outline permission was granted on 30th September 2021 and further approval of reserved matters will need to be sought for most of the development. In addition to reserved matters, there are many detailed pre-commencement conditions attached to the outline consent that will need to be discharged before development can commence on site, including, inter alia, a design code, street manual and housing strategy.
- 2.5 The Lichfields ‘Start to Finish’ Second Edition (February 2020) report looks at the evidence on the speed and rate of delivery of housing sites across England and Wales (outside London). It states that for sites of 2000 or more dwellings, the average planning approval period is 6.1 years, with the planning to delivery period taking on average 2.3 years¹.
- 2.6 The latest FBC 5 Year Housing Land Supply (5YHLS) Position report (January 2022) predicts that 30 units will be delivered in 2022, with a further 180 predicted for delivery in 2023. This timescale is considered overly ambitious and highly unlikely, given the scheme’s delayed position in the planning system, the technical complexities and risks associated with large strategic sites and in the absence

¹ Page 6, Figure 4

of any robust evidence to suggest a faster delivery than the 'average' identified in the 'Start to Finish' report.

Reliance on Strategic Sites at the Expense of Smaller Sites

- 2.7 A stepped housing trajectory is not considered appropriate or justified and is only serving to suppress housing delivery, particularly when there are suitable and available, smaller, less complex sites that can come forward earlier on in the plan period, including the site at Pinks Hill. The justification for a stepped trajectory is further weakened by the poor delivery rates over recent years and the Council's current HDT measurement. As set out above and in response to question 1, the reliance on Welborne to deliver almost half the housing requirement is therefore not justified.
- 2.8 In addition, the PPG makes clear that: "*Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period²*", however as explained above, it is doubtful that the planned housing requirement will be achieved on time and delays are considered likely.
- 2.9 In FBC's reply to the Planning Inspectorate (3 December 2021), FBC state: "*the total requirement and the stepped requirements reflect what can be delivered as evidenced in the SHELAA*". However, we disagree with this statement. There are suitable, available and achievable sites within this SHELAA that can come forward in the first five years of the plan, but have been discounted for illogical reasons, such as the site at Pinks Hill, which was proposed for allocation in a previous draft iterations of the plan, demonstrating that FBC considered it a suitable site for development. There is no clear evidence why sites that have been previously considered suitable have been suddenly excluded and this is not justified given the immediate housing need and historic poor delivery.
- 2.10 In response to question 10, there is indeed a need for additional sites which can contribute to the first 5 years' supply in case larger allocated sites stall. One such site is that at Pinks Hill. Not only was it once proposed for allocation, but it is still listed as a 'suitable site' with low landscape sensitivity within the current SA and SEA (CD003) dated May 2021 – see site 1998 'Pinks Hill, Wallington'.
- 2.11 FBC's proposed approach is contrary to the national objective to significantly boost the supply of housing and the plan in its current form omits and suppresses sustainable housing development sites from coming forward earlier on in the plan period.

Contingency

- 2.12 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. In response to question 2, we suggest a 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.

² Paragraph 0.21, Reference ID: 68-021-20190722

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.

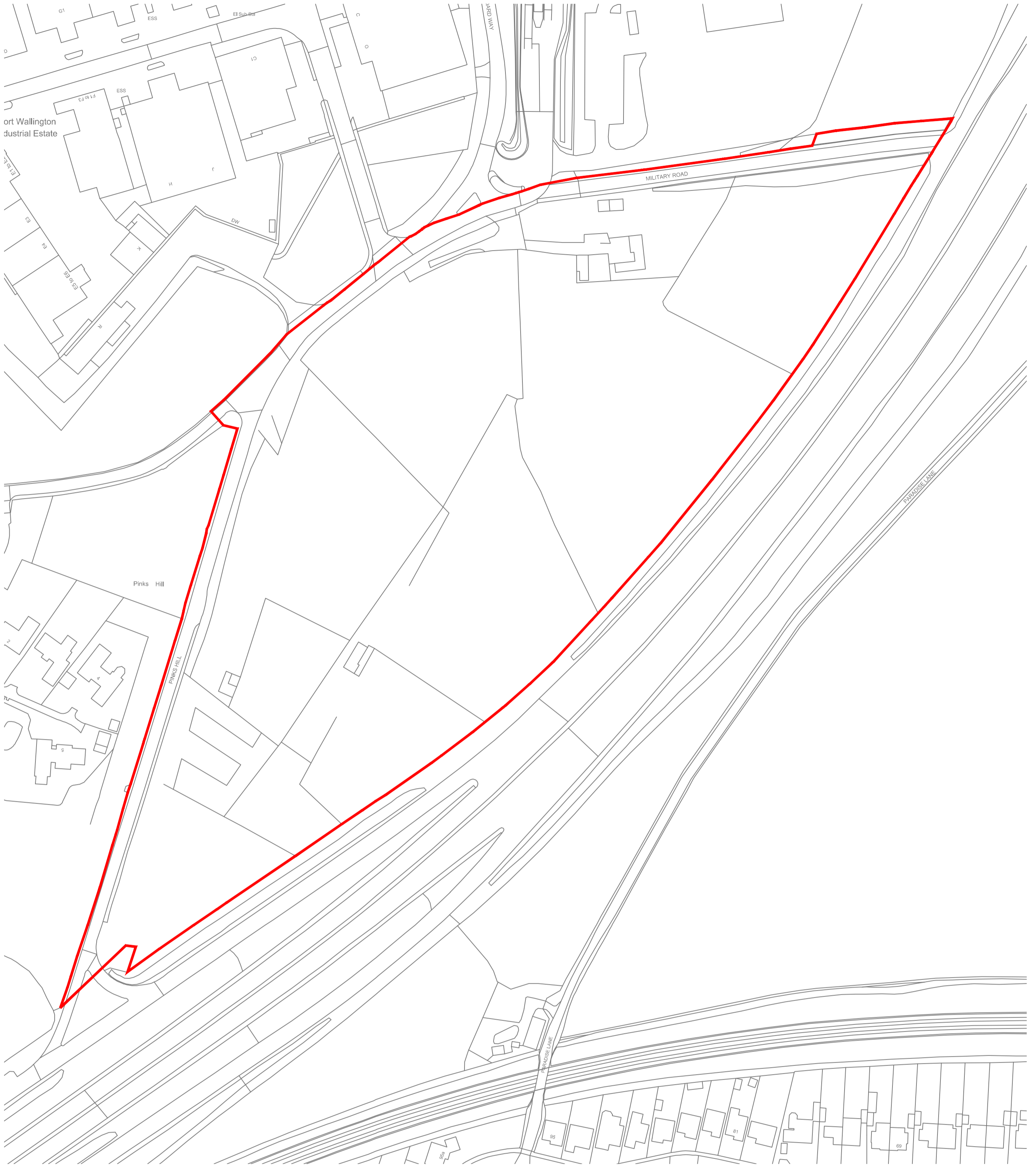
- 2.13 In January 2021, the Government published the 2020 Housing Delivery Test (HDT) results which confirmed FBC's delivery to be 79% and as a consequence, the 20% buffer was applied. By January 2022, the Government published the updated 2021 HDT results which confirms a worsening performance, with a delivery rate of just 62%, meaning the NPPF's presumption is now applied.
- 2.14 As explained above, 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. 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*"³. 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.

³ NPPF paragraph 69


3.0 SUMMARY

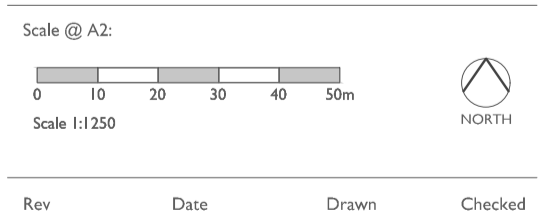
- 3.1 In response to questions 1, 2, 6, 7 and 10 of the Inspector's MIQs, it is demonstrated in this Statement that the plan in its current form is not effective, justified or sound and should not be adopted as it currently stands.
- 3.2 The timescales for the anticipated delivery rate of Welborne Garden Village are considered overly ambitious and highly unlikely, given the scheme's delayed position in the planning system, the technical complexities and risks associated with large strategic sites and in the absence of any robust evidence to suggest a faster delivery than the 'average' identified in the 'Start to Finish' report.
- 3.3 A stepped housing trajectory is not considered appropriate or justified and is only serving to suppress housing delivery, particularly when there are suitable and available smaller, less complex sites that can come forward earlier on in the plan period, including the site at Pinks Hill.
- 3.4 The reliance on Welborne to deliver almost half the housing requirement is neither justified, nor an appropriate way of achieving sustainable development and there is indeed a need for additional sites which can contribute to the first 5 years' supply in case allocated sites stall or deliver slower than anticipated.
- 3.5 Moreover, an 11% contingency is not sufficient to ensure the plan is flexible and robust enough to deliver the required amount of housing.
- 3.6 To make the plan sound, FBC should amend the trajectory so that it is not so backloaded and does not place as much reliance on a single, very large strategic site, which is likely to be subject to delays.
- 3.7 There are suitable, available and achievable sites that can and should be allowed for within the plan to come forward in the first five years of adoption of the plan, including the site at Pinks Hill.
- 3.8 In addition, a greater contingency of circa 20% should be applied to provide increased robustness and flexibility so that delays do not compromise the deliverability of the plan.

APPENDIX 1 – PINKS HILL SITE LOCATION PLAN



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 Application Boundary
15.438ac / 6.247ha



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:

