

# **Fareham Borough Council Hearing Statement**

## **Matter 7 – Housing Land Supply**

Prepared on behalf of

**Metis Homes**

February 2022

# Document control

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## 1.0 INTRODUCTION

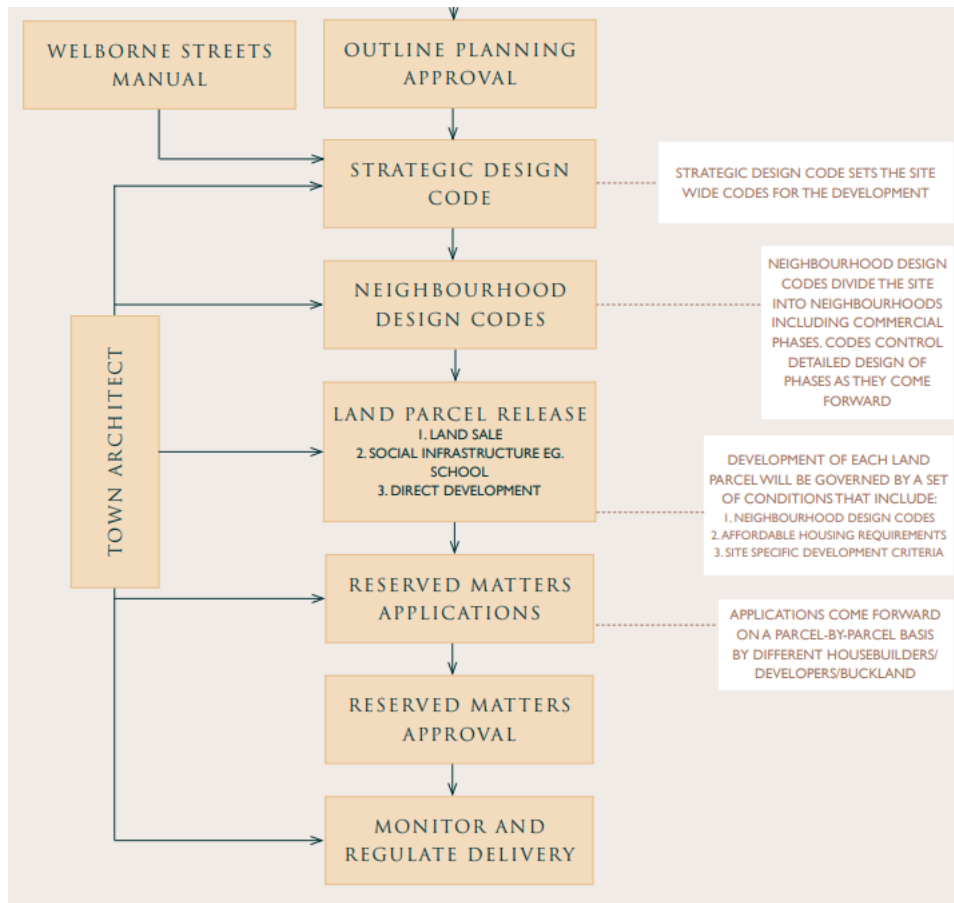
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- 1.1 Tetra Tech Planning have been instructed by Metis Homes to participate in the Examination of the Fareham Local Plan 2037.
- 1.2 Metis Homes have an opportunity to bring forward development at Land to the Rear of 35 Burridge Road, Burridge, as identified on the plan attached at **Appendix A**. Metis Homes have previously made representations in response to the Regulation 19 Fareham Revised Publication Local Plan 2037 consultation (July 2021).
- 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. Metis Homes' interest in this matter emanates from their interests in promoting for development Land to the Rear of 35 Burridge Road.
- 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 upon the points made during the Regulation 19 consultation in relation to housing supply and delivery. It will conclude that modifications should be made to make the plan sound, including avoiding reliance on a single, large strategic site at the expense of smaller sites, achieving the 10% of the housing requirement on sites of one hectare or less and by applying a greater contingency to ensure increased robustness and flexibility.
- 1.6 This Statement should be read alongside the Regulation 19 representation, as well as the separate Hearing Statements submitted in relation to Matter 2 (Development Strategy), Matter 3 (Housing Need and Supply), Matter 4 (Housing Policies) and Matter 5 (Gypsies, Travellers and Travelling Showpeople).

## 2.0 STEPPED HOUSING TRAJECTORY AND LEAD-IN TIMES

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- 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, massively reduced amounts 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 30<sup>th</sup> September 2021 with Buckland as Master Developer. According to the Welborne Delivery Strategy (FBC014) a design coding exercise is to be undertaken post granting of outline planning permission. An excerpt of the schematic diagram at page 68 of FBC014 is reproduced below which illustrates the significant interim steps required prior to the sale of parcels to developers. As parcels are sold, each developer will subsequently need to prepare and submit applications for reserved matters. All these steps will take significant lengths of time and are prone to significant delays.



- 2.5 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 design manual and housing strategy.
- 2.6 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 years<sup>1</sup>.
- 2.7 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. In response to question 7 of the MIQ's, 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 of any robust evidence to suggest a faster delivery than the 'average' identified in the 'Start to Finish' report.

<sup>1</sup> Page 6, Figure 4

- 2.8 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 land at Burr ridge.
- 2.9 As set out above and in response to question 1 of the MIQ's, the reliance on Welborne to deliver almost half the housing requirement is therefore not justified.
- 2.10 The PPG makes clear that: "*Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period<sup>2</sup>*", however as explained above, it is doubtful that the planned housing requirement will be achieved on time and delays are considered likely.

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<sup>2</sup> Paragraph 0.21, Reference ID: 68-021-20190722

### 3.0 RELIANCE ON STRATEGIC SITES AND INSUFFICIENT CONTINGENCY

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- 3.1 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 and based on regular engagement with relevant parties"*. However, we disagree with this statement. There are suitable and available, smaller, less complex sites that can come forward in the first five years of the Plan, including land at Burridge. The Council have not proactively explored delivery of these smaller sites which could cumulatively add up to a significant figure.
- 3.2 In response to question 9 of the MIQ's, smaller sites would contribute to a 5YHLS, and the position as it currently stands is highly fragile. In response to question 10 of the MIQ's, there is a clear need for additional sites which can contribute to the first five years' supply in case allocated sites stall. This can include land at Burridge.
- 3.3 Furthermore, paragraph 69a of the NPPF states that local planning authorities should *"identify, through the development plan...land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved"*. In response to question 3 of the MIQ's, FBC have not provided any strong justification for this target not being achieved. As explained above there are many suitable and available sites of less than one hectare that can come forwards for development which FBC have chosen to omit from Plan.
- 3.4 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**

- 3.5 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. A 1% contingency is not considered sufficient to ensure enough flexibility is allowed for in the Plan, particularly given FBC's recent track record of under-delivery of housing.
- 3.6 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 presumption is now applied. This drop in



performance in just one year shows a significant problem in the approach being undertaken by the Council.

- 3.7 The Plan is far too reliant upon strategic sites to supply much of its housing requirement. Delays in the delivery of such sites are not uncommon due to landowner disputes, infrastructure delivery delays, the large number of technical issues to be addressed and this overreliance on large sites has proven unsuccessful in Fareham historically.
- 3.8 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>3</sup>. Therefore, a greater buffer, consisting of small and medium site allocations, should be applied to provide increased certainty, 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 and the particular reliance on a single, very large strategic site that has been plagued by delays and overpromised delivery dates.

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<sup>3</sup> NPPF paragraph 69

## 4.0 SUMMARY

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- 4.1 This Statement demonstrates that in response to questions 1, 2, 3, 6, 7, 9 and 10 of the Inspector's MIQs, the Plan in its current form is not effective, justified or sound and should not be adopted as its currently stands.
- 4.2 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.
- 4.3 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 land at Burridge.
- 4.4 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 five years' supply in case allocated sites stall.
- 4.5 FBC have not provided any strong justification for not achieving the 10% of the housing requirement on sites of one hectare or less.
- 4.6 An 11% contingency is not sufficient to ensure the plan is flexible and robust enough to deliver the required amount of housing.
- 4.7 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. There are suitable, available and achievable smaller, less complex 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 land at Burridge.
- 4.8 In addition FBC should be achieving the 10% of the housing requirement on sites of one hectare or less, as well as applying a greater contingency of circa 20% to provide increased robustness and flexibility so that delays do not compromise the deliverability of the plan.

## **APPENDICES (Attached Separately)**

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Appendix A – site location plan